



# Replacement Local Development Plan 2018-2033

Initial Consultation Report:  
Preferred Strategy and Candidate Sites Register  
October 2024



monmouthshire  
sir fynwy

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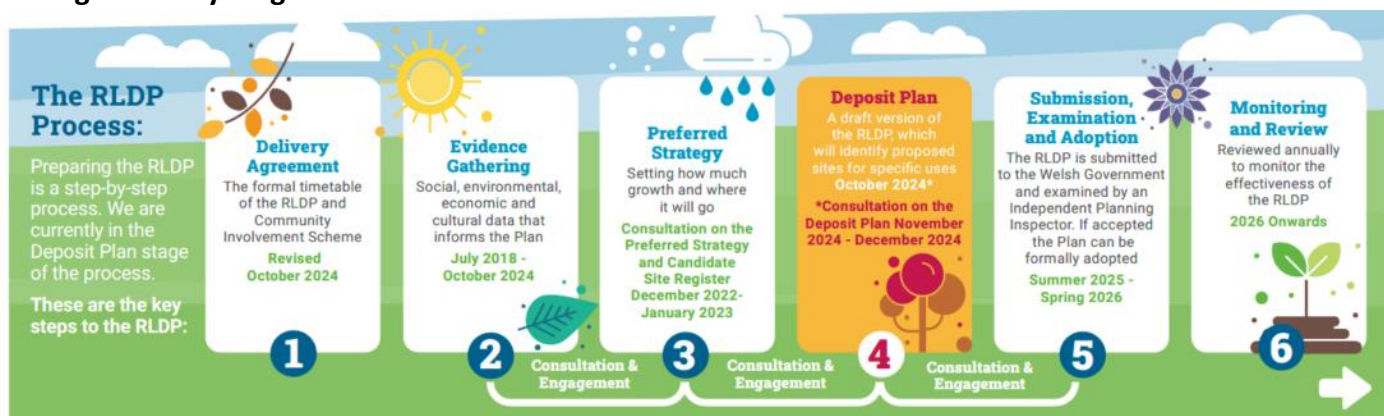
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## Initial Consultation Report: Preferred Strategy and Candidate Site Register

### 1. Introduction

- 1.1. The Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within Bannau Brycheiniog National Park), covering the period 2018 to 2033. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies against which future planning applications will be assessed. When adopted, the RLDP will replace the existing adopted LDP as the statutory land use development plan for the County
- 1.2. The preparation of the RLDP involves a number of key stages, see figure 1, which includes a Delivery Agreement (Revised October 2024) setting out the timetable for Plan preparation and the Community Involvement Scheme (CIS)<sup>1</sup>. The CIS sets out how the Council proposes to proactively involve the community and stakeholders in the preparation of the RLDP in order that a range of views can be considered as part of the process of building a wide consensus on the Plan's strategy and policies.
- 1.3. This Initial Consultation Report sets out how we engaged with the community and stakeholders as part of the consultation and engagement on the Preferred Strategy<sup>2</sup> (December 2022) and Candidate Sites Register (CSR), which took place between 5<sup>th</sup> December 2022 and 30<sup>th</sup> January 2023. The structure of this report is as follows:
- Section 2 sets out the methods of engagement utilised at the Preferred Strategy stage, in accordance with the CIS, to ensure effective and efficient consultation and engagement, including how and who we consulted. The documents that were available for public consultation at this stage are also provided.
  - Section 3 sets out the summaries of the key issues raised in relation to the Preferred Strategy consultation.
  - Section 4 sets out the summaries of the key issues raised in relation to the Candidate Site Register consultation, along with the Local Planning Authority (LPA) Response and LPA Recommendation.

**Figure 1: Key Stages of the RLDP Process**



<sup>1</sup> For further information see Delivery Agreement (Revised October 2024)

<sup>2</sup> As required by LDP Regulation 16a

## 2. Methods of Engagement

- 2.1. Consultation and engagement on the RLDP Preferred Strategy took place between 5<sup>th</sup> December 2022 and 30<sup>th</sup> January 2023. During this period we invited the views of communities and stakeholders on the following:
- The Plan’s key issues, challenges and opportunities for the County;
  - The Plan’s vision and objective that respond to the key issues, challenge and opportunities;
  - The Plan’s scale of future growth in homes and jobs and where this growth will be spatially located; and
  - The preferred strategic site allocations and strategic policies to deliver/implement the Plan.
- 2.2. Alongside consultation on the Preferred Strategy, consultation also took place on the RLDP Candidate Site Register (CSR), which provides the location and basic site information of the sites submitted during the Second Call for Candidate Sites. This consultation allowed communities and interested parties to comment on the candidate sites within the register.
- 2.3. It should be noted that at the time of the CSR consultation, sites had undergone a high level assessment and as part of this assessment sites which did not meet the initial filtering assessment criteria<sup>3</sup> were ‘filtered out’ of the process. Of note, sites were filtered out due to an environmental phosphate constraint identified at the time, whereby sites within the Upper River Wye catchment, including those within the Primary Settlement of Monmouth were filtered out due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Subsequently, however, Welsh Government’s response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW’s planned improvements at the Monmouth Wastewater Treatment Works by 31<sup>st</sup> March 2025.
- 2.4. Consequently, in October 2023 Council agreed to the identification of a strategic site allocation in Monmouth. In addition, candidate sites within the Upper River Wye Valley catchment area that were previously filtered out have been reassessed as part of the Candidate Site Assessment process. As a result, the Candidate Site Register has been updated to reflect this change.

### Consultation Documents

- 2.5. The consultation documents that were available for the Preferred Strategy and CSR Consultation are set out in Table 1. Paper copies of the Preferred Strategy, Preferred Strategy Summary, Preferred Strategy Easy Read, Candidate Sites Register, Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment of the Preferred Strategy were available for public inspection at County Hall Usk, the Council’s Community Hubs and public libraries. All documents in table 1 were available to view on the Planning Policy Website. The Preferred Strategy, including the Summary and Easy Read documents were available bilingually in Welsh.

**Table 1: Consultation Documents**

#### Consultation Documents

<sup>3</sup> Compatibility with the Preferred Strategy, site size, fundamental constraints and submission of site viability evidence.

<b>Key Stage</b>	
<b>Delivery Agreement</b>	Delivery Agreement (Revised December 2022)
<b>RLDP Evidence Base</b>	RLDP Issues, Vision and Objectives (Updated December 2022)
	RLDP Growth and Spatial Options (September 2022)
	Sustainable Settlement Appraisal (Updated December 2022)
	Self-Assessment of the Preferred Strategy against the Test of Soundness (December 2022)
<b>Preferred Strategy</b>	Preferred Strategy (December 2022)
	Preferred Strategy Summary (December 2022)
	Preferred Strategy Easy Read and Animation (December 2022)
	Initial Integrated Sustainability Appraisal (ISA) Report (November 2022)
	Habitats Regulations Assessment (HRA) of the Preferred Strategy (November 2022)
<b>Candidate Sites</b>	Candidate Site Register (December 2022)
	Candidate Site Assessment Methodology (December 2022)
	Candidate Site High- level Assessment (December 2022)
<b>Other Evidence</b>	
<b>Housing</b>	Local Housing Market Assessment 2020-2025 (2020)
	Housing Background Paper (December 2022)
	Demographic Evidence Report (Updated November 2021)
	Gypsy and Traveller Accommodation Assessment (May 2016)
<b>Natural Environment</b>	Landscape Sensitivity Study Update (October 2020)
<b>Economy</b>	Economies of the Future: Economic Baseline Report (March 2018)
	Monmouthshire 2040: Economic Growth and Ambition Statement (November 2019)
	Inward Investment Prospectus 2020: Growing your business in Monmouthshire (March 2020)
	Regional Employment Study (March 2020)
	Employment Land Review (November 2022)
	Employment Land Background Paper (May 2022)
<b>Renewable Energy</b>	Renewable and Low Carbon Energy Assessment (October 2020)
<b>Retail</b>	Retail Background Paper (August 2022)

<b>Minerals</b>	Minerals Regional Technical Statement (September 2020)
<b>Waste</b>	The South East Wales Waste Planning Report (April 2016)

## Consultation Engagement Methods

- 2.6. A number of engagement methods were utilised for the Preferred Strategy consultation to ensure a broad and effective reach out to different people within the community and that a range of views could be captured. The engagement methods that were undertaken are set out in table 2.

**Table 2: Consultation Engagement Methods**

Consultation Methods	
Members Workshops	Date
Members' Workshop (hosted by Place Scrutiny Committee) to brief Members of the RLDP process and allow for informal discussion.	2 <sup>nd</sup> November 2022
Press Release	
Press Release to inform the general public of the intention to report the Preferred Strategy to Council 1 <sup>st</sup> December 2022 and, if agreed, to consult on the Preferred Strategy between 5 <sup>th</sup> December 2022- 30 <sup>th</sup> January 2023. Emails were sent out to all on the RLDP database.	4 <sup>th</sup> November 2022
Place Scrutiny Committee	
Place Scrutiny Committee, to formally scrutinise the Preferred Strategy before being presented at Council on 1 <sup>st</sup> December	10 <sup>th</sup> November 2022
Council	
Council endorsed the Preferred Strategy for statutory consultation for an 8-week period from 5 <sup>th</sup> December 2022 – 30 <sup>th</sup> January 2023. Council also agreed to consult on the CSR, ISA and HRA alongside the Preferred Strategy. The Revised Delivery Agreement was agreed by Council on 1 <sup>st</sup> December 2022 and agreed with the Welsh Government on the 2 <sup>nd</sup> December 2022.	1 <sup>st</sup> December 2022
The Preferred Strategy, Easy Read Guide, Summary PS and animation, along with the Candidate Sites Register, Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment were issued for statutory public consultation for an eight-week period between 5 <sup>th</sup> December 2022 and 30 <sup>th</sup> January 2023.	
Notification of the consultation on the Preferred Strategy and CSR Email consultation	

<p>Notification of the consultation, inviting comments, was sent to the statutory and approx. 1,000 other consultees, agents, and individuals on the RLDP consultation data base. This includes statutory consultees, including the Welsh Government, Natural Resources Wales, all Town and Community Councils in Monmouthshire, and neighbouring Local Authorities..</p>	<p>Emails and letters sent 2<sup>nd</sup> December 2022</p>
<p><b>Public Information Exhibitions ('Drop-in' Sessions)</b></p>	
<p>Eight public information exhibitions ('drop-in' sessions) were held in various locations across the County. All exhibitions were held between 2pm to 7pm and were widely advertised via the easy read, posters, social media and the Planning Policy website.</p> <p>The exhibitions displayed information bilingually with large display boards, such as maps of the preferred strategic sites, together with and with paper copies of the Preferred Strategy and supporting evidence. Copies of the Easy Read were available to take away.. The exhibitions allowed the public and local residents to 'drop-in' within the advertised time to discuss the Preferred Strategy and any of the supporting information with a Planning Policy Officer. The Head of Planning and Planning Policy Manager attended each exhibition session and a minimum of two Planning Policy Officers were available at each of the eight exhibitions to explain the process and answer /clarify any queries.</p>	<ul style="list-style-type: none"> <li>• Abergavenny – Market Hall 12<sup>th</sup> December 2022</li> <li>• Monmouth, Shire Hall 15<sup>th</sup> December 2022</li> <li>• County Hall, Usk 19<sup>th</sup> December 2022</li> <li>• Magor Baptist Church 11<sup>th</sup> January 2023</li> <li>• Chepstow, Board School 12<sup>th</sup> January 2023</li> <li>• Portskewett, Church Hall 17<sup>th</sup> January 2023</li> <li>• Caldicot, Choir Hall 18<sup>th</sup> January 2023</li> <li>• Raglan Village Hall 19<sup>th</sup> January 2023</li> </ul>
<p><b>Virtual Consultation Sessions</b></p>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>A virtual event for Town and Community Councils was held. This event presented information on the RLDP process, the implications of the Preferred Strategy and details of the how to respond to the consultation. We also invited members of the Town and Community Councils to disseminate this information to their communities and to raise awareness of the consultation.</p>	<p>6<sup>th</sup> December 2022</p>
<p>Two virtual events were held which were open to all. This was compèred by MCC Communications Team and facilitated members of the public to submit questions for the Head of Planning and Planning Policy Officers to answer. A presentation of the RLDP Process and Preferred Strategy was given and the animation played. Both events were recorded and available to watch back on the Planning Policy website.</p>	<p>8<sup>th</sup> December 2022, 6pm -7.30pm 10<sup>th</sup> January 2023, 2 pm - 3.30pm</p>
<p><b>Social Media</b></p>	

<p>Information regarding the Preferred Strategy and CSR was posed on various Social Media platforms, including via MCC X (Twitter) and MCC facebook accounts.</p> <p>Engagement also took place via the following:</p> <ul style="list-style-type: none"> <li>• Developer Forum meeting</li> <li>• A MCC department-wide officer meeting</li> </ul>	<p>Various posts between 5<sup>th</sup> December 2022 – 30<sup>th</sup> January 2023</p>
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## Consultation Responses

- 2.7. Consultation responses to the Preferred Strategy and CSR were invited which could be submitted via Preferred Strategy and CSR representation forms. These were available as paper copies at the venues referenced in Table 2, and electronically. Electronic versions of the forms could be submitted directly via the Planning Policy website. The consultation questions for the Preferred Strategy were framed around specific questions designed to assist in ensuring that all key aspects of the Preferred Strategy were duly considered by respondents. The Preferred Strategy consultation questions and responses are set out in Section 3 below. The CSR form invited respondents to make comments in relation to specific candidate sites. The responses are grouped by the Candidate Site references, as set out in Section 4 below.
- 2.8. The consultation resulted in approximately 220 responses to the Preferred Strategy and 650 representations on the Candidate Sites register. The following sections of the report provide an overview of the main findings of the consultation exercise on the RLDP Preferred Strategy and CSR. This is not intended to be a comprehensive report on each comment received, rather a summary of the key issues raised in response to the specific questions in relation to the Preferred Strategy and specific sites in the CSR.



### 3. Preferred Strategy Summary of Representations

#### QUESTIONS ASKED DURING THE PREFERRED STRATEGY 2022 CONSULTATION

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## 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
<b>General support</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• Support the Vision and Objectives but believe a greater proportion of development should be directed towards the main rural settlements [Monmouthshire Housing Association].</li> <li>• Accept the Objectives are sufficiently aspirational yet achievable to varying degrees [Abergavenny &amp; District Civic Society].</li> <li>• Support and agree with statement in paragraph 3.2 [Natural Resources Wales].</li> <li>• 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].</li> <li>• 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].</li> <li>• Key objectives set out within the vision are supported [Hallam Land Management].</li> <li>• Consider the relevant core issues have been identified [Redrow Homes].</li> <li>• Suggest the vision, issues and objectives are fairly generic and uncontentious in nature [Barratt &amp; David Wilson Homes South Wales, Candleston Homes, Taylor Wimpey PLC &amp; Private individual x 1].</li> <li>• 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 an important part of evidencing that the RLDP is sound. Acknowledge and support the key issues, challenges and opportunities [Redrow Homes Limited].</li> <li>• Support the key issues, challenges &amp; opportunities and note the vision and objectives comply and integrate with the WBFGA [Edenstone Group, Barwood Development Securities Limited &amp; Edenstone].</li> <li>• Support the vision and objectives [Mathern Community Council &amp; Private individual x 1].</li> <li>• 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].</li> <li>• Agree with the high level vision and broadly agree with the objectives [Private individual x 1].</li> <li>• Comprehensive strategy, support all 17 objectives [Private individual x 1].</li> </ul>

<b>LPA Response</b>	Support for the Issues, Vision and Objectives is welcomed and noted.
<b>LPA Recommendation</b>	No change required.
<b>Key issues, challenges and opportunities</b>	<ul style="list-style-type: none"> <li>• 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 &amp; David Wilson Homes, Barratt &amp; David Wilson Homes South Wales, Richborough Estates, Candleston Homes &amp; Taylor Wimpey PLC].</li> <li>• Suggest a full carbon footprint of the County Is needed to inform where maximum carbon reductions should be focussed, refer to remaining within 1.5oC suggesting this is too vague [Abergavenny Transition Town].</li> <li>• Refer to the summary of key issues, suggest ‘appropriate growth sectors’ needs defining particularly given the climate emergency [Abergavenny Transition Town].</li> <li>• Question what ‘opportunities associated with growth from both the Cardiff Capital Region and Bristol Region’ are, suggest recent examples be provided [Abergavenny Transition Town].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Suggest the causes of phosphate pollution should be specified to allow policy to focus on the dominant causes [Abergavenny Transition Town].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Wider water network failures should be listed as well as phosphates to ensure proposed growth doesn’t exacerbate this problem [Natural Resources Wales].</li> <li>• Acknowledge changes to issues relating to biodiversity and also invasive non-native species [Natural Resources Wales].</li> <li>• Key opportunities should also include the Nature Recovery Plan [Natural Resources Wales].</li> <li>• 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 &amp; opportunities for growth from both the Cardiff Capital and Bristol regions [Richborough Estates].</li> <li>• 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].</li> </ul>

- 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].

<b>LPA Response</b>	Minor updates have been made to the Key Issues, Challenges and Opportunities where relevant in response to some of the comments noted above to provide further clarity and also to account for factual changes such as updated Census data, the Local Housing Market Assessment Refresh and the Tourism STEAM report.
<b>LPA Recommendation</b>	Minor updates have been made to the Key Issues, Challenges and Opportunities. A summary of the key issues, challenges and opportunities are included in the Deposit RLDP. The updated Issues are included in full as an Appendix to the RLDP and also are set out in the Issues, Vision and Objectives Paper (updated September 2024).
<b>RLDP Vision</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• State vision is acceptable but clear definition of net zero carbon ready is required [Abergavenny &amp; District Civic Society].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; David Wilson Homes South Wales].</li> <li>• 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].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; Taylor Wimpey PLC].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Amend the Vision as appropriate.
<b>LPA Recommendation</b>	Appropriate amendments to the Vision have been made as a result of some of the consultation responses. The vision has been streamlined to avoid duplication and repetition.
<b>Objective 1 (Economic Growth/ Employment)</b>	<ul style="list-style-type: none"> <li>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 &amp; Private individuals x 2].</li> <li>Objective 1 would benefit from an emphasis on the circular economy and 'green' and/or 'clean' growth [Abergavenny &amp; District Civic Society].</li> <li>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].</li> <li>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].</li> <li>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].</li> <li>Little indication on how this objective will be turned into a reality [Usk Civic Society].</li> <li>Support objective [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Objective 1 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor amendment to reflect comments above, to ensure there is no ambiguity 'appropriate growth sectors' has been removed from the objective. No other changes considered necessary. Further details relating to Economic Growth and Employment are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor update has been made to Objective 1; no other changes are considered necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 2 (Town and Local Centres)</b>	<ul style="list-style-type: none"> <li>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 &amp; Private individuals x 2].</li> <li>Agree with Objective [Abergavenny Transition Town].</li> <li>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 &amp; The Coldbrook Estate].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Objective 2 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor factual amendment to bring the objective in line with the updated references made in the Town, Local and Neighbourhood Centres Strategic Policy. No other changes considered necessary. Further details relating to Town, Local and Neighbourhood Centres are included within the wider RLDP and detailed policy

	framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor factual update has been made to Objective 2, with no further changes necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 3 (Green Infrastructure, Biodiversity and Landscape)</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Private individuals x 2].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 3 is considered appropriate and reflects the issues the Plan is seeking to address. However, there has been one minor factual update to account for the change of name to the Wye Valley National Landscape (AONB). No other changes considered necessary. Further details relating to Green Infrastructure, Biodiversity and Landscape are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor factual update has been made to Objective 3, with no further changes necessary. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 4 (Flood risk)</b>	<ul style="list-style-type: none"> <li>• Welcome inclusion of objective [Dwr Cymru/Welsh Water].</li> <li>• 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].</li> <li>• Acknowledge the reference to natural flood management within this objective [Natural Resources Wales].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 4 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Flood Risk are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 5 (Minerals and Waste)</b>	<ul style="list-style-type: none"> <li>• Suggest should discourage carbon intensive consumption generally and encourage re-use, repair, refill and recycle [Abergavenny Transition Town].</li> <li>• Reference to waste reduction in Objective 7 should be included in Objective 5 [Abergavenny Transition Town].</li> </ul>



<b>LPA Response</b>	Objective 5 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Minerals and Waste are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 6 (Land)</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Private individuals x 2].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; Edenstone].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• Support objective as it maximises the opportunities for redevelopment of brownfield sites [Private individual x 1].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 6 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Best and Most Versatile Land (including site search sequence), Allotments and Community Food Growing are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 7 (Natural resources)</b>	<ul style="list-style-type: none"> <li>• Welcome the sentiment of objective [Dwr Cymru/Welsh Water].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• 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].</li> </ul>

<b>LPA Response</b>	Objective 7 is considered appropriate and reflects the issues the Plan is seeking to address. The Council's approach to net zero carbon requirements is included within the wider RLDP and detailed policy framework of the Deposit Plan. The wording of this objective has been updated in line with the comments made and amended to 'ensure' to align with the SE Area Statement. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor update has been made to Objective 7 in line with comments made. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 8 (Health and Well-being)</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 8 is considered appropriate and reflects the issues the Plan is seeking to address. Support for and provision of recreation and open space facilities is included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 9 (Demography)</b>	<ul style="list-style-type: none"> <li>• State the reference to providing opportunities of housing and employment for young people is not evidenced and is largely aspirational [Abergavenny Town Council].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• Suggest adding 'through increasing considerably, state-led third sector public housing provision, rather than relying on market-led development' [Abergavenny Transition Town].</li> <li>• State the policies must create a more balanced demography and social and economically sustainable communities if the issues are to be addressed [Richborough Estates].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 9 is considered appropriate and reflects the issues the Plan is seeking to address. Addressing the core issues of housing affordability and rebalancing the demography of the County continue to be key priorities of the Deposit Plan, along with the climate and nature emergency and economic prosperity. This is appropriately reflected in the Deposit Plan's policy framework which includes a policy approach to ensure allocated residential sites provide 50% affordable housing and a housing mix policy to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.

<p><b>LPA Recommendation</b></p>	<p>No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.</p>
<p><b>Objective 10 (Housing)</b></p>	<ul style="list-style-type: none"> <li>• Question why there is no reference to meeting net zero carbon for all new developments [Abergavenny Town Council].</li> <li>• Objective 10 should include reference to the wider need for housing not just affordable [Home Builders Federation &amp; Abergavenny &amp; District Civic Society].</li> <li>• 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].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• Concern over viability of 50% affordable housing as has not been achieved previously [Abergavenny Transition Town].</li> <li>• 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 &amp; Redrow Homes].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<p><b>LPA Response</b></p>	<p>Objective 10 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to Housing are included within the wider RLDP and detailed policy framework of the Deposit Plan. Delivery of affordable housing continues to be a core priority of the RLDP. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.</p> <p>The delivery of exemplar places is a Council ambition. New housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This approach is reflected in a specific housing mix policy within the RLDP. The affordable housing requirements in S7 must, however, be adhered to.</p>

	<p>The core issues of housing affordability and rebalancing the demography of the County continue to be the focus of the Deposit Plan, along with the climate and nature emergency and economic prosperity. A housing mix policy is included in the plan to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County.</p> <p>All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.</p>
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 11 (Placemaking)</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Suggest this largely repeats Objective 10 [Abergavenny Transition Town].</li> <li>• Suggest this is very subjective with aims open to developer spin and influence. Suggest language is more focussed on measurable characteristics [Cllr Christopher Edwards &amp; Private individual x 1].</li> <li>• Support objective [Edenstone].</li> </ul>
<b>LPA Response</b>	Objective 11 is considered appropriate and reflects the issues the Plan is seeking to address. The delivery of exemplar places is a Council ambition. Further details relating to Placemaking are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 12 (Communities)</b>	<ul style="list-style-type: none"> <li>• Welcome and support objective 12 [Theatres Trust].</li> <li>• 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].</li> <li>• Note this will be reliant on delivering sufficient levels of growth capable of sustaining and enhancing the most sustainable settlements [Richborough Estates].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 12 is considered appropriate and reflects the issues the Plan is seeking to address. However, an update has been made to reflect the Community and Corporate Plan objectives which aims to ensure Monmouthshire is a connected place where people feel part of a community and are valued. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor changes made, as above. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 13 (Rural communities)</b>	<ul style="list-style-type: none"> <li>• Welcome growth being directed to a degree towards Secondary Settlements and Main Rural Settlements [Llanover Estates, Leathdunn Ltd., Johnsey Estates 2020 Ltd &amp; The Coldbrook Estate].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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 &amp; Private individuals x 2].</li> <li>• 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].</li> <li>• Agree with this objective, note 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 13 is considered appropriate and reflects the issues the Plan is seeking to address. The growth and spatial strategy focusses growth in the County’s most sustainable settlements, however some growth is directed to the most sustainable rural settlements to deliver much needed affordable homes and to address rural inequity and rural isolation in these areas, further details are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 14 (Infrastructure)</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; Private individuals x 3].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Objective 14 is considered appropriate and reflects the issues the Plan is seeking to address. Infrastructure requirements are included within the wider RLDP and detailed policy framework of the Deposit Plan. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites, a summary of which noting site specific considerations is included as an appendix to the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 15 (Accessibility)</b>	<ul style="list-style-type: none"> <li>• Support the use of private car as the last option for travelling [Abergavenny Transition Town].</li> <li>• Welcome objective recognising accessibility can be achieved via a variety of means [Richborough Estates].</li> <li>• 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 &amp; Private individual x 1].</li> </ul>

<b>LPA Response</b>	Objective 15 is considered appropriate and reflects the issues the Plan is seeking to address. Further details relating to the transport hierarchy, active travel and sustainable transport are included within the wider RLDP and detailed policy framework of the Deposit Plan. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 16 (Culture, Heritage and Welsh Language)</b>	<ul style="list-style-type: none"> <li>• Support Objective 16 in the context of the Welsh language but it is unclear how the Council intends to achieve this [Welsh Language Commissioner].</li> <li>• Suggest tourism shouldn't be included in this objective as many aspects demote the use of Welsh language [Abergavenny Transition Town].</li> <li>• Suggest this objective won't be achieved as traffic queues will prevent repeat tourism visits [Cllr Louise Brown].</li> </ul>
<b>LPA Response</b>	Objective 16 is considered appropriate and reflects the issues the Plan is seeking to address. Additional information relating to Welsh Language is considered further in the wider RLDP. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	No change required. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objective 17 (Climate and Nature Emergency)</b>	<ul style="list-style-type: none"> <li>• Disappointed Climate Crisis is the last objective, state would like this to be the principal objective overarching the RLDP [Abergavenny Town Council &amp; Abergavenny Transition Town].</li> <li>• 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].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• 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 &amp; Llanarth Estates].</li> <li>• Note there is no mention of lowering the carbon footprint of in-commuting [Abergavenny Transition Town].</li> <li>• 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].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> <li>• Suggest rewording 'To strive to limit the increase in global temperatures to 1.5oC' to 'To strive to pursue policies and action which contribute to the international goal of limiting the increase in global temperatures to 1.5oC' as it implies MCC policies could have this effect [Private individual x 1].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>• Suggest the zero carbon requirement for new homes may put off developers given the expense [Usk Civic Society].</li> <li>• Suggest building in the south of the County encourages out-commuting [Private individuals x 2].</li> <li>• 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].</li> <li>• Question the link between the Monmouthshire Public Service Board Well-being plan objective and the Welsh language in objective 16 [Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comments noted. The list of objectives is not ranked in any way. The Council's approach to climate change, nature recovery and net zero carbon requirements is included within the wider RLDP and detailed policy framework of the Deposit Plan. The wording of this objective has been updated in line with the Preferred Strategy Update in September 2023 to remove the word 'ready' (in relation to net zero carbon). All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>LPA Recommendation</b>	Minor change made following the Preferred Strategy Update in September 2023 to remove references to 'ready' in the context of net zero carbon. Wider update for all objectives to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives.
<b>Objectives general</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Barwood Development Securities Limited].</li> <li>• 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].</li> <li>• Suggest green tourism is missing from the objectives, suggest this can bring in younger visitors to the area [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Comments noted. The reference to objectives having increased emphasis in light of Covid-19 has been removed as this related to a fixed period of time and is no longer considered relevant. The Council's approach to tourism is included within the wider RLDP and detailed policy framework of the Deposit Plan.
<b>LPA Recommendation</b>	No change required.
<b>Missing challenges</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Private individuals x 2].</li> <li>• Refer to quality of existing housing in terms of insulation, carbon footprint, suggest this should be included as a challenge [Private individual x 1].</li> </ul>

<b>LPA Response</b>	Comments noted, while some of these challenges are not specifically addressed many are considered in the wider RLDP and policy framework. All objectives have been updated to include the relevant Gwent Public Service Board Well-being Plan Steps and the Community and Corporate Plan Objectives where some of these issues are also considered.
<b>LPA Recommendation</b>	No change required.
<b>Area specific – Chepstow</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• Refer to the national green belt stating the spread of Chepstow towards the boundary should be resisted [Cllr Christopher Edwards, Cllr Louise Brown &amp; Private individual x 1].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Council has worked/continues to work collaboratively with the Forest of Dean and South Gloucestershire councils on cross-boundary issues affecting Chepstow in relation to the A48.</p> <p>A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire’s transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. The STA considers the impact of highway travel and traffic pressure from the Forest of Dean and the surrounding area upon the highway network including Highbeech roundabout in the Chepstow locality. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the ‘Sustainable</p>



	<p>Transport Hierarchy'. An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for allocated sites.</p> <p>The RLDP aims to broadly align the spatial distribution of housing and employment growth through-out the County and provide a range and choice of sites. Employment site allocations are set out in the Employment and Economy section of the Plan - Policies EA1a-EA1m. This does not specify the exact use of employment sites but does note whether the sites are allocated for B1, B2 or B8 uses.</p> <p>It is not considered necessary to include settlement specific objectives in the RLDP. Details regarding the strategic site allocation in Chepstow are appropriately set out in the RLDP and relevant supporting background papers, please refer Questions 9 and 11 of the Report of Consultation in relation to the Chepstow Strategic Site allocation for further detail. No changes are proposed.</p>
<b>LPA Recommendation</b>	No change required.
<b>Area specific – Severnside</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.</p> <p>Policy HA2 relates to Land to the East of Caldicot, the proposal includes a substantial amount of public open space and recreation uses and brings more land into public use which is of benefit to the wider community. Part of the site in ownership by the David Broom Event Centre and has put forward as a development opportunity by the landowner.</p> <p>The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.</p> <p>It is not considered necessary to include settlement specific objectives in the RLDP. Details regarding the strategic site allocation at Caldicot East are appropriately set out in the RLDP and relevant supporting background papers. No changes are proposed.</p>

<b>LPA Recommendation</b>	No change required.
<b>Area specific – Abergavenny</b>	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].
<b>LPA Response</b>	Comments noted. A Green Belt is not proposed in Abergavenny in accordance with Future Wales (WG, 2021). The Green Wedge Assessment has informed the designation of green wedges throughout the County and has been considered as part of the site selection process. The RLDP seeks to support economic growth through the inclusion of an overarching strategy and potential jobs growth figure that could be supported by the population and housing growth planned over the Plan period. The RLDP will seek to achieve this through the allocation of a range of B use class employment sites and a supportive policy framework for jobs that will be delivered other sectors such as tourism, leisure food, retail and agriculture. It is recognised that the RLDP is only one mechanism for delivering on economic growth. The Economy, Employment and Skills Strategy (EESS) sets out the Council's direction of travel and action plan for achieving economic growth. It is not considered necessary to include settlement specific objectives in the RLDP. No changes are proposed.
<b>LPA Recommendation</b>	No change required.
<b>Area specific – Monmouth</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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 &amp; Private individual x 1].</li> </ul>
<b>LPA Response</b>	Comment noted, the Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
<b>LPA Recommendation</b>	No change required.
<b>Site specific - other</b>	<ul style="list-style-type: none"> <li>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].</li> <li>Refer to CS0113 Castle Oaks Site D, CS0039 Land at Little Castle Farm &amp; 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].</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.

<b>LPA Recommendation</b>	No change required.
<b>Promotion of sites</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Promote CS0111 Land adjacent Thistledown Barn, Shirenewton noting Objectives 10, 12 and 13 can all be met [Private individual x 1].</li> <li>• Promote CS0128 Land at Chapel Farm noting it can fully support the vision [Hallam Land Management].</li> <li>• 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 &amp; Development].</li> <li>• 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].</li> <li>• 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].</li> <li>• Promote CS0165 noting this aligns with the vision and will contribute to the achievement of the 17 RLDP objectives [Barwood Development Securities Limited].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>• Concerned over the emphasis on residential development with insufficient employment land allocation [Abergavenny Town Council].</li> <li>• Suggest the issues, vision and objectives are well meaning but vague with no mention of the need to react to climate change [Abergavenny &amp; Crickhowell Friends of the Earth].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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. &amp; Johnsey Estates 2020 Ltd].</li> <li>• 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 &amp; Richborough Estates].</li> <li>• State the RLDP should make specific allocations for older peoples housing including care provision [Grove Farm Estates &amp; Development].</li> <li>• Suggest the plan period should be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP housing requirement [Edenstone Group &amp; Edenstone].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comments noted, many of the comments raised above are considered in the wider RLDP and policy framework.
<b>LPA Recommendation</b>	No change required.

## Question 2 – Do you have any comments on the Preferred Strategy?

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:

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Growth level represents compromise and is supported.</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Growth level represents a compromise between the 2021 Preferred Strategy and Welsh Government prescribed level. [Abergavenny Town Council, Private Individual, Abergavenny &amp; District Civic Society]</li> <li>• 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]</li> </ul>

	<ul style="list-style-type: none"> <li>Recognised the revised PS responds to a number of challenges including WG's objection and water quality issues. [Hallam Land Management, Edenstone]</li> </ul>
<b>LPA Response</b>	<p>The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p> <p>The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.</p>
<b>LPA Recommendation</b>	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
<b>Growth Level is too low</b>	<ul style="list-style-type: none"> <li>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]</li> <li>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 &amp; David Wilson]</li> <li>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]</li> <li>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]</li> <li>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 &amp; 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]</li> <li>Increase in housing supply should be pursued to address affordability issues rather than a blanket 50% affordable housing requirement. [Edenstone]</li> </ul>
<b>LPA Response</b>	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed

	<p>in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p> <p>The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales.</p>
<b>LPA Recommendation</b>	<p>In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.</p>
<b>Growth level is too high</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p>

	<p>The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.</p>
<p><b>LPA Recommendation</b></p>	<p>In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.</p>
<p><b>Spatial Distribution</b></p>	<ul style="list-style-type: none"> <li>• Proportionate growth distribution is welcomed. [Dwr Cymru]</li> <li>• Support general approach, however, the Deposit Plan should place greater value on the Main Rural Settlements to accommodate growth. [Llanover Estates, Coldbrook Estate]</li> <li>• Support for focus on growth in the County's most sustainable primary settlements [BDW]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• Increase distribution and provision at lower tier settlements [MHA, BB3 Ltd, Manor Farm Partnership, Coldbrook Estate, Private Individuals x 6]</li> <li>• Greater proportion of growth should be apportioned to Chepstow. [Barwood Development Securities]</li> <li>• 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]</li> <li>• 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]</li> <li>• Not clear how the most sustainable rural sites are being identified - many are declining in terms of facilities. [Llangybi Fawr CC]</li> <li>• 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]</li> </ul>
<p><b>LPA Response</b></p>	<p>Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements.</p>

	<p>Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary. Monmouthshire’s primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this.</p> <p>Paragraph 3.53 of PPW12 states that due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales.</p> <p>The RLDP approach to rural housing is consistent with national policy.</p> <p>The Council is working collaboratively with NRW and Dwr Cymru Welsh Water in relation to phosphate issue and this will continue as the Plan progresses to inform site specific delivery and reflect improvement timescales.</p>
<b>LPA Recommendation</b>	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1 <sup>st</sup> April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
<b>Settlement Hierarchy</b>	<ul style="list-style-type: none"> <li>• Little Mill should be recategorized as a Tier 2 Settlement. [MHA]</li> </ul>
<b>LPA Response</b>	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Further information on the methodology can be found in the SSA.
<b>LPA Recommendation</b>	No change required.
<b>Strategic Sites/Delivery</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County.</p> <p>Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The</p>



	<p>change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing soon after the adoption of the plan to start addressing this current unmet affordable housing need.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>
<b>LPA Recommendation</b>	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
<b>Monmouth Growth</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government’s response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW’s planned improvements at the Monmouth Wastewater Treatment Works by 31 <sup>st</sup> March 2025. Following Welsh Government’s confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
<b>LPA Recommendation</b>	In accordance with the October 2023 Council, the Deposit Plan allows for growth in Monmouth.
<b>PS Priorities</b>	<ul style="list-style-type: none"> <li>• Prominence given to climate change and delivery of affordable housing is welcomed. [FoD]</li> <li>• 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]</li> </ul>

	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Affordable housing threshold should not apply to windfall site. [Private Individual]</li> <li>• 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].</li> <li>• Providing affordable housing in areas where there are no employment opportunities and rail connections makes no sense – blanket affordable housing requirement inappropriate for this reason. [Private Individual]</li> <li>• More effort/consideration should be given to remedial action to address phosphate and other water issues in the Wye. [Private Individual]</li> <li>• Reference to the role and opportunity presented by community led affordable housing would be beneficial. [Cwmpas]</li> <li>• Focus should be on making nice places to live, not building more houses. [Private Individual]</li> <li>• Not enough emphasis on transport issues. [Private Individual]</li> <li>• Stronger focus on energy efficient homes is needed. [Private Individual]</li> </ul>
<b>LPA Response</b>	Support for the Preferred Strategy priorities is welcomed, with the core issues of housing affordability, rebalancing our democracy, climate and nature emergency and economic prosperity continuing to be the key priorities of the Deposit Plan. Further details on how these will be achieved is set out in the detailed policy framework of the Deposit Plan.
<b>LPA Recommendation</b>	Refer to the detailed policies of the Deposit Plan for specific policy requirements.
<b>Potential failure to deliver core strategy components</b>	<ul style="list-style-type: none"> <li>• 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 &amp; District Civic Society, Private Individual]</li> <li>• 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]</li> <li>• RLDP should also cater for the older population. [Grove Farm Estates &amp; Development, Chepstow Society]</li> <li>• Ratio of affordable homes is unrealistic along with zero carbon aspirations. [Mathern CC, Private Individual]</li> <li>• Infrastructure and accessibility insufficient to deliver PS aims and objectives. [Private Individuals x 6, Cllr Louise Brown]</li> <li>• PS will fail to deliver its key aims and objectives and will therefore fail the Tests of Soundness. [Cllr Louise Brown]</li> <li>• More integrated approach needed to improving transport infrastructure and other infrastructure in and near Chepstow. [The Chepstow Society, Private Individuals x 4]</li> </ul>
<b>LPA Response</b>	The Deposit Plan is supported by a robust and comprehensive evidence base including the Infrastructure Delivery Plan, which provide further details on the points raised.
<b>LPA Recommendation</b>	No change required.
<b>Cross Boundary Issues</b>	<ul style="list-style-type: none"> <li>• The Forest of Dean District Council keen to work collaboratively to bring about sustainable solutions to cross boundary transport issues. [FoD]</li> </ul>

	<ul style="list-style-type: none"> <li>• Gloucestershire County Council 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]</li> <li>• 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]</li> <li>• Levels of growth for individual LPAs should be agreed at a strategic level through the preparation of an SDP. [Private Individual]</li> <li>• Has development across the border been considered? [Private Individual]</li> </ul>
<b>LPA Response</b>	The Council has worked/continues to work collaboratively with neighbouring local authorities, including the Forest of Dean and South Gloucestershire councils and authorities in South East Wales, on cross-boundary issues such as growth levels and transport.
<b>LPA Recommendation</b>	No change required.
<b>Flexibility Allowance</b>	<ul style="list-style-type: none"> <li>• Increase flexibility allowance to ensure the timely delivery of sites. [MHA, Private Individual]</li> <li>• Prudent to increase the flexibility allowance in light of the substantial reduction in growth that is now proposed [Hallam Land Management, Edenstone]</li> <li>• 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]</li> <li>• Flexibility allowance is not needed and is likely to be exploited by the developers [Private Individual, Cllr Christopher Edwards]</li> </ul>
<b>LPA Response</b>	In October 2023 a report of post-consultation updates to the Preferred Strategy was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing soon after the adoption of the plan to start addressing this current unmet affordable housing need.
<b>LPA Recommendation</b>	Incorporate a 15% flexibility allowance in the Deposit Plan as agreed by Council in October 2023.
<b>Windfall/Small Site Allowance</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Ban on windfall sites in the Wye Catchment is an overreaction to an issue caused primarily by agriculture. [Private Individual]</li> </ul>
<b>LPA Response</b>	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a

	conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
<b>LPA Recommendation</b>	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate.
<b>Jobs Growth</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Given the continued lack of clarity about the economic growth and how it will be achieved, an Economic Development Strategy is needed. [Private Individual]</li> <li>• Surprised to see the removal of SAE1h Land at Pill Row. [FI Real Estate Management Ltd]</li> <li>• No evidence to support and drives the jobs growth figure. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>The jobs figure contained in the RLPD is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County.</p> <p>The Council published its Economy, Employment and Skill Strategy in 2023 which sets out the Council's action plan for focussing on four key priority themes which have emerged from the Corporate and Community Plan.</p> <p>Adopted LDP allocation SAE1h – Land at Pill Row is within a flood risk area.</p>
<b>LPA Recommendation</b>	
<b>Lacking details/information</b>	<ul style="list-style-type: none"> <li>• Question what the Council understand by 'new homes are net zero ready' and how it will be assessed and by whom. [HBF, Private Individual]</li> <li>• PS contains well-meaning but vague statements – Deposit plan must correct this. [Abergavenny &amp; Crickhowell FoE]</li> <li>• 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].</li> <li>• There is no definition included of an 'Affordable Home'. [Private Individuals x 2]</li> <li>• Data and statistics feeding into the strategy must be examined in more detail to explain the level of growth. [Private Individuals x 2]</li> </ul>
<b>LPA Response</b>	The Deposit Plan is supported by a robust and comprehensive evidence base, which provide further details on the points raised.
<b>LPA Recommendation</b>	Refer to the RLDP evidence base for full details on the details requested.
<b>Site Promoted in response to Question 2</b>	<ul style="list-style-type: none"> <li>• Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd]</li> <li>• Johnsey Estates – CS0247 – Cooper III [Johnsey Estates Ltd]</li> <li>• Hallam Land management – CS0128 Chapel Farm [Hallam Land Management]</li> <li>• Grove Farm Estates – CS0269 – Grove Farm [Grove Farm Estates]</li> <li>• Johnsey Estates Ltd – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd]</li> </ul>

	<ul style="list-style-type: none"> <li>• Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd]</li> <li>• Barwood Development Securities – CS0165 Mounton Road [Barwood Development Securities]</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in Candidate Site Assessment Report.
<b>LPA Recommendation</b>	See Candidate Site Assessment Report for Candidate Site recommendations.

### Question 3 – Do you have any comments on Strategic Policy S1 – Growth Strategy?

99 organisations or members of the public submitted a response to question 3.

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 3 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
<b>Support/ appropriate Growth Level</b>	<ul style="list-style-type: none"> <li>• Level of growth will ensure Monmouthshire continues to grow in a sustainable manner based on locally appropriate levels of development, which is compatible with Policies 1, 7 and 33 of FW 2020. Whilst it is above the 2018 based projections and past build rates of the last 5 and 10 years, a higher level of housing is only justified by the severe need to deliver affordable housing. The strategy of concentrating new growth primarily in Caldicot and the Severnside (44%) should reduce the potential to negatively impact on environmental assets and avoid adverse consequences for climate and nature emergencies. [WG]</li> <li>• Support quantum of growth as being sufficiently ambitious when considered against the WG 2018-based principal household projection. Level recognises that whilst Monmouthshire is not within the national growth area identified in FW 2020, the RLDP evidence base shows that the proposed level of growth is essential to deliver MCC's local evidence-based issues and ensure the RLDP is sound. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Tompkins Thomas Planning, The Coldbrook Estate, Private Individual]</li> <li>• New housing target appears to be a reasonable compromise and is supported. [SOUL, The Chepstow Society]</li> </ul>
<b>LPA Response</b>	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and

	<p>phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p> <p>The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales.</p>
<p><b>LPA Recommendation</b></p>	<p>In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.</p>
<p><b>Growth level is too low</b></p>	<ul style="list-style-type: none"> <li>• Growth level represents a significant reduction in housing provision from that justified by evidence in the previous version of the PS. Appreciate PS has been strongly influenced by WG but the current PS does not fully align with the previous evidence base. [HBF, B&amp;DW, Vistry, Redrow Homes, B&amp;DW Homes, Richborough Estates, Llanarth Estates, Bellway Homes, Marston’s PLC, Candleston Homes, Taylor Wimpey PLC]</li> <li>• Approach to significantly reduce the number of homes and jobs will not address the key issues facing the County and is contrary to Soundness Tests 2 &amp; 3. Trends such as ageing demographic, affordability, out commuting, concentration along the M4 corridor will be exacerbated. Noted that the Council is stifled by WG. [Melin Homes, Edenstone Homes, Stantonbury Building and Development Company, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2]</li> <li>• Merit in a higher growth level to address issues. [MHA, Persimmon Homes East Wales, MHA, Edenstone, Private Individuals x 2]</li> <li>• Plan period should be rolled forward by three years to take account of delays and consider the need for a higher provision of housing to accommodate additional plan period. [Hallam Land Management, TW, Edenstone Homes, Marston’s PLC]</li> </ul>
<p><b>LPA Response</b></p>	<p>The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p>

	The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales.
<b>LPA Recommendation</b>	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
<b>Growth level is too high</b>	<ul style="list-style-type: none"> <li>• The level of growth is not in conformity with FW 2020 and the level of growth proposed is twice the amount for a County which has only 6% of the population of the SDP region. [Abergavenny Town Council, Abergavenny &amp; Crickhowell FoE, Abergavenny &amp; District Society, Cllr Christopher Edwards, Private Individuals x 7]</li> <li>• Growth is excessive, contrary to WG target and could lead to unsustainable and environmentally damaging levels of growth in settlement tiers. [Llanarth Fawr CC, Raglan CC, Raglan Village Action Group, Usk Civic Society, Private Individuals x 3]</li> <li>• Growth level is too high and cannot be accommodated within the existing infrastructure in the County. [Mathern CC, Cllr Louise Brown, Private Individuals x 6]</li> </ul>
<b>LPA Response</b>	The 2022 Preferred Strategy growth level of 5,400 homes housing requirement and enabling the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responded to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These include allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.
<b>LPA Recommendation</b>	In line with the October 2023 Council decision, the housing requirement remains at 5,400 homes based on a demographic-led scenario with added policy assumptions, however, the flexibility allowance is increased from 10% to 15% resulting in a housing provision figure of 6,210 homes.
<b>Jobs Growth Figure</b>	<ul style="list-style-type: none"> <li>• Significant concerns with ability of the RLDP to meet the aspirational targets. There is a lack of robust evidence that Monmouthshire has realistic prospects of attracting 6,240 jobs. [Abergavenny Town Council, Abergavenny &amp; Crickhowell FoE, Abergavenny &amp; District Society, Usk Civic Society, Cllr Christopher Edwards, Private Individuals x 5]</li> <li>• HBF question why the level of housing proposed has been reduced by 2,966 yet the provision of new jobs has only been reduced by 975. Uncertain there will be enough homes to deliver the jobs given 50% are to be affordable. [HBF]</li> <li>• Generally, support the provision of 6,240 jobs, however it is vital that sufficient housing growth underpins the economic growth strategy. [Barwood Dev Securities Ltd]</li> <li>• Lowered jobs growth target is regrettable representing a 15% reduction. This will diminish the potential of the plan to deliver its growth objectives, including to reduce commuting. [F1 Real Est Management]</li> </ul>

	<ul style="list-style-type: none"> <li>Working from home trend not guaranteed. [Private Individual]</li> <li>Growth strategy misses the importance of agriculture in growing Monmouthshire's economy. [Our Food 1200]</li> </ul>
<b>LPA Response</b>	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County.</p> <p>The RLDP recognises the importance of the agricultural sector in Monmouthshire and provides a supportive policy framework to assess rural diversification and enterprise proposals that come forward. However, many agricultural processes do not require planning permission and are therefore beyond the scope of the RLDP.</p>
<b>LPA Recommendation</b>	No change required.
<b>Assumptions/Evidence</b>	<ul style="list-style-type: none"> <li>Lack of evidence relating to a number of assumptions including migration, household membership rates and commuting ratio. No evidence to support assumptions will happen, for example young people will move into the new houses. [Abergavenny Town Council, Abergavenny &amp; Crickhowell FoE, Private Individuals x 5]</li> <li>Support the requirement for net zero ready homes and associated infrastructure to ensure the development is sustainable and well-connected. Definitions required on these terms and how they will be measured. [Abergavenny &amp; Crickhowell FoE, Vistry, Usk Civic Society, Private Individuals]</li> <li>Clear housing trajectory needed identifying the phasing and timings of sites. Selected strategic growth options should be progressed further with greater clarity including schematic diagrams and the key issues. [WG]</li> <li>Higher variant of the WG 2018-based Household Projection should be used as the starting point. [Candleston Homes, Taylor Wimpey PLC]</li> <li>Net zero ready requirement does not go far enough. [Cllr Christopher Edwards]</li> <li>Support the 20-minute neighbourhood principle. [Private Individual]</li> </ul>
<b>LPA Response</b>	The Deposit Plan sets out a more detailed policy framework and is supported by a robust and comprehensive evidence base. Relevant supporting evidence and background papers should be referred to for further information.
<b>LPA Recommendation</b>	Refer to the supporting evidence base for further information.
<b>Affordable Housing</b>	<ul style="list-style-type: none"> <li>Fully endorse the proposal for 50% affordable homes but question deliverability. [Abergavenny Town Council]</li> <li>Commitment to ensure new site allocations provide 50% affordable homes is ambitious. Positive that the PS recognises that WG funding may be required to achieve target. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Vistry Group, The Coldbrook Estate, Private Individual]</li> <li>What is the definition of affordable homes. [Abergavenny &amp; Crickhowell FoE, Private Individuals x 2]</li> <li>Unlikely affordable housing targets will be fulfilled based on past experience. [Private Individual, Llangybi Fawr CC, Cllr Louise Brown]</li> <li>Agree with focus on delivering affordable homes. [Abergavenny Transition Town]</li> <li>Viability assessments required to take account of all required costs including building regs and net zero ready requirements to demonstrate 50% is achievable. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3]</li> </ul>



	<ul style="list-style-type: none"> <li>• Should make policy provision for 100% larger affordable sites outside the settlement boundaries, but adjacent to main and secondary settlements. [BB3, Manor Farm Partnership, Private Individuals x 3]</li> <li>• Commitment of WG to change its policy position on the use of Social Housing Grant funding is required to achieve affordable housing targets. [Private Individual, Cllr Louise Brown, Cllr Christopher Edwards]</li> </ul>
<b>LPA Response</b>	<p>Comments noted, delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council and provides the evidence for 50% affordable housing provision on all new site allocations. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7. A definition of affordable housing is included in the Deposit RLDP.</p> <p>Policy H9 relates to affordable housing exception sites and lists different thresholds for proposals based on the settlement tiers identified in S2, this in turn allows for larger affordable housing exception sites adjacent to Primary Settlements than a site located adjacent a Minor Rural Settlement. Refer to Policy H9 for further detail.</p> <p>Issues in the way Social Housing Grant funding can be used to achieve affordable housing targets have been raised with Welsh Government, however this sits with Welsh Government and is not something within Monmouthshire's control. As noted above viability assessments have been undertaken for all allocated sites and they can achieve the 50% affordable housing figure without additional funding.</p>
<b>LPA Recommendation</b>	<p>Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.</p>
<b>Flexibility Allowance</b>	<ul style="list-style-type: none"> <li>• Higher percentage of flexibility should be included. [HBF, Private Individuals x 2]</li> <li>• Support the inclusion of a flexibility allowance, but 10% should be viewed as a starting point. [Llanover Estates, Leathdunn Ltd, Johnsey Estates, Stantonbury Building &amp; Development Company, Barwood Dev Securities Ltd, Vistry Group, Private Individual]</li> <li>• If growth level remains, the flexibility allowance should be increased to 25% to facilitate consumer choice and allow for allocations not being delivered, S106 agreements not being signed, and windfall and small site allowances not being achieved. [B&amp;DW]</li> <li>• 20% flexibility allowance should be included to provide a contingency should some housing sites fail to deliver as per the trajectory. [Hallam Land Management, TW, Edenstone Homes, Persimmon Homes East Wales, Bellway Homes, Marston's PLC, Edenstone]</li> <li>• 25% flexibility allowance should be considered to address shortfall in LDP shortfall and other constraints affecting delivery. [B&amp;DW Homes, Candlestone Homes, Taylor Wimpey PLC]</li> <li>• Flexibility allowance is not needed and is likely to be exploited by developers. [Private Individual, Cllr Christopher Edwards]</li> </ul>
<b>LPA Response</b>	<p>In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.</p>

<b>LPA Recommendation</b>	Incorporate a 15% flexibility allowance in the Deposit Plan as agreed by Council in October 2023.
<b>Existing Commitments</b>	<ul style="list-style-type: none"> <li>• Removal of previous allocations which have either stalled or are not supported by sufficient evidence to demonstrate delivery is a prudent approach. [WG]</li> <li>• Viability of existing commitments and likelihood of delivery during the next plan period is questioned. [BB3 Ltd, Manor Farm Partnership, Tirion Homes, Sero Homes, Private Individuals x 3]</li> <li>• Impact on deliverability has not been adequately considered. Suggest applying a non-delivery allowance. [Persimmon Homes, Grove Farm Estates]</li> <li>• Welcome the decision to not rollover historic housing allocations. [Grove Farm Estates]</li> </ul>
<b>LPA Response</b>	In line with the Development Plans Manual (DPM) a non-delivery allowance has been applied to the existing commitments element of the housing supply components. The DPM allows for two approaches to this; either as a percentage across the overall land bank or sites can be discounted individually. Given the relatively small number of sites involved and based on Officer knowledge of sites, it has been decided to discount 4 sites which it is considered that there is insufficient information to demonstrate that they will come forward during the Plan period. Further details can be found in the Housing Background Paper.
<b>LPA Recommendation</b>	No change required.
<b>Windfall/ Small Sites Allowance</b>	<ul style="list-style-type: none"> <li>• Windfall allowance is unrealistic and contrary to the AMR which argues a reduction in forecasted windfall sites completions. Suggest re-evaluating the windfall allowance. [Persimmon Homes East Wales]</li> <li>• Concerned by the windfall and small site allowance. Appreciate it is based on past trends, but this should be reviewed given phosphates and the current economic climate. [Grove Farm Estates]</li> <li>• Whilst it is reasonable to expect windfall sites to continue to contribute to supply, there is a risk that relying too heavily on past trends could lead to an overestimation of their contribution over the new plan period. Significant shift in national planning policy, placing stronger emphasis on the plan led approach making it more difficult to bring forward sites that are not existing allocations. [Richborough Estates]</li> </ul>
<b>LPA Response</b>	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
<b>LPA Recommendation</b>	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate (15% reduction).
<b>Strategic Sites</b>	<ul style="list-style-type: none"> <li>• There should be less resilience on strategic sites and more smaller sites allocated throughout the County. [Private Individual]</li> <li>• PS does not provide a strategy that will increase the delivery of market and affordable housing due to its suppressed housing requirement and over reliance on a single large strategic site. [Vistry]</li> <li>• Provision should be made specifically for the older population. [Grove Farm Estates, Private Individual]</li> </ul>

<b>LPA Response</b>	<p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County.</p> <p>Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>The level of growth set out in the Preferred Strategy (2022) was informed by a wide range of evidence and responded to a number of challenges that had arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. The Deposit Plan is considered to represent a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales.</p> <p>The Deposit Plan provides the policy framework to allow for the consideration of specialist housing to come forward throughout the Plan period (Policy H7 – Specialist Housing), which includes the housing requirements of older people.</p>
<b>LPA Recommendation</b>	No change required.
<b>Phosphates</b>	<ul style="list-style-type: none"> <li>• Uncertainty surrounding the timescales of resolving phosphate constraints which will have impacts on the allocation of candidate sites. [Abergavenny Town Council]</li> </ul>
<b>LPA Response</b>	<p>Since the phosphate guidance was introduced by NRW, Monmouthshire County Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers, farmers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers.</p>
<b>LPA Recommendation</b>	Continue to liaise with the relevant organisations on phosphate matters.
<b>Monmouth</b>	<ul style="list-style-type: none"> <li>• An early review of the Plan should be scheduled to take account of the potentially changing circumstances with the phosphate issue in Monmouth. [BB3, Richard Willett, Manor Farm Partnership, Private Individuals x 2]</li> <li>• Agree land should be safeguarded in Monmouth and treated as windfall sites. This would allow for development in Monmouth should the phosphates situation change. [BB3, Manor Farm Partnership, Private Individuals x 3]</li> <li>• Lack of housing in the north of the County results in the RLDP being unsound. [Hallam Land Management, TW, Edenstone Homes, Bellway Homes]</li> </ul>

<b>LPA Response</b>	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
<b>LPA Recommendation</b>	In accordance with the October 2023 Council, the Deposit Plan allows for growth in Monmouth.
<b>General</b>	<ul style="list-style-type: none"> <li>• Reference should be made to Objective 5 – Minerals and Waste and Objective 14 – Infrastructure in relation to Policy S1. [MPA]</li> <li>• Statements regarding net-zero ready homes do not go far enough. [Private Individual]</li> <li>• Working from home assumptions should not be relied upon. [Private Individual, Usk Civic Society]</li> <li>• Focus is on house building rather than creating places. [Private Individual]</li> <li>• Preservation of green belt sites should be top priority of the Council. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy.</p> <p>Further clarification on the policy approach to net zero homes is set out in the Deposit Plan in Policy NZ1 – Monmouthshire Net Zero Carbon Homes and associated the supporting evidence.</p> <p>Working from home assumptions are not relied upon, but the Plan does recognise the change in working patterns.</p> <p>A key focus of the Deposit Plan is establishing placemaking principles to be implemented through development on the ground. There is an extensive policy framework setting out the Council's policy approach including policies Strategic S3 – Sustainable Placemaking &amp; High Quality Design, PM1 – Creating Well Designed Places, Strategic Policy S8 – Site Allocation Placemaking Principles and site specific allocation policies.</p> <p>The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this.</p>
<b>LPA Recommendation</b>	No change required.
<b>Cross Boundary Issues</b>	<ul style="list-style-type: none"> <li>• Torfaen CBC interested in continued collaboration in developing work. [Torfaen CBC]</li> <li>• PS does not reference any dialogue with other authorities regarding strategic housing sites, as required by FW2020. [Abergavenny &amp; Crickhowell FoE]</li> <li>• While the PS is considered to be in general conformity with FW 2020, further technical work is required to demonstrate the plan has met the tests of soundness in terms of collaboration with neighbouring authorities and growth in terms of jobs and homes. [WG]</li> </ul>

<b>LPA Response</b>	The Council has, and continues to work collaboratively with our neighbouring authorities and the wider South East Eales region and English border authorities in preparing our respective LDPs which enables consideration of cross border issues, including levels of growth and the spatial distribution of development. At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Through SEWSPG the LPAs work collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP.
<b>LPA Recommendation</b>	No change required.
<b>Sites promoted in response to question 3</b>	<ul style="list-style-type: none"> <li>• BB3 Ltd – CS0278 – West of Raglan [BB3 Ltd]</li> <li>• Leathdunn Ltd – CS0036 – West of B4293, Devauden [Leathdunn Ltd]</li> <li>• Johnsey Estates – CS0247 – Cooper III [Johnsey Estates]</li> <li>• Manor Farm Partnership - CS0278 – West of Raglan [Manor Farm Partnership]</li> <li>• Johnsey Estates Ltd – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd]</li> <li>• Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd]</li> <li>• Edenstone – CS0205 – Land at Usk Road, Raglan [Edenstone]</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in Candidate Site Assessment Report.
<b>LPA Recommendation</b>	See the Candidate Site Assessment Report for Candidate Site recommendations.

#### **Question 4 – Do you have any comments on Strategic Policy S2 Spatial Distribution of Development – Settlement Hierarchy?**

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

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.

Comments relating to specific candidate sites have not been included here and are dealt with via the candidate site assessment process.

Key themes raised in relation to Question 4 on the Preferred Strategy are set out below:

Key Theme	Summary of Points Raised
<b>Primary Settlements</b>	<ul style="list-style-type: none"> <li>• Support proportionate distribution of growth and advise that larger infrastructure is generally located in the more urbanised Primary Settlements, and it is these locations where there tends to be fewer capacity restrictions. [Dwr Cymru]</li> <li>• Support settlement hierarchy and focus of growth on the Primary settlements of either Abergavenny, Caldicot or Chepstow. [B&amp;DW, Abergavenny &amp; Crickhowell FoE, Johnsey Estates, Edenstone Homes, Grove Farm Estates &amp; Development, Redrow Homes, Richborough Estates, Bellway Homes, Candleston Homes, Taylor Wimpey PLC, Private Individual]</li> <li>• WG does not object to the settlement hierarchy and distribution of housing growth. [WG]</li> <li>• Do not support growth of more than 20% for Abergavenny [SOUL, Private Individual]</li> </ul>
<b>LPA Response</b>	<p>Support for the distribution of growth is welcomed. The Deposit Plan identifies 22% of housing growth is to be accommodated in Abergavenny. As one of Monmouthshire’s Primary Settlements this is considered to be an acceptable proportion of growth.</p>
<b>LPA Recommendation</b>	<p>No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.</p>
<b>South of County</b>	<ul style="list-style-type: none"> <li>• Recommend that a higher level of development is achievable in the south of the County. [Abergavenny Town Council]</li> <li>• South is more likely to achieve balance of homes and jobs, with limited phosphate impacts. [Abergavenny &amp; District Civic Society]</li> <li>• Concerned that 44% of growth is focussed on the south of the County. More balanced and evenly distribution of new homes should be considered. [Melin Homes, MHA, Persimmon Homes, Frances Taylor, Llanarth Estates, Stantonbury Building and Development Company, Cllr Louise Brown, Tirion Homes, Sero Homes, Sero, Private Individuals x 12]</li> <li>• Growth in Severnside – potential implications for not increasing proportionately private car trips or best and most versatile land will need to be demonstrated by deposit stage. [WG]</li> <li>• Needs to be an integrated approach to the environment, the scale of development and the provision of infrastructure in Chepstow. Over development of Chepstow will destroy the “green” surroundings of Chepstow. Infrastructure is at capacity. [The Chepstow Society, Private Individuals x 13]</li> <li>• Support further growth in Chepstow. Despite being identified as a primary settlement it has significantly less growth than Abergavenny and Severnside. [Barwood Development Securities Limited]</li> <li>• Given 44% of housing growth in Caldicot there is a case to support employment growth commensurate to the housing growth in Caldicot. [F1 Real Estate]</li> <li>• Support further proportionate growth in Magor. [Edenstone]</li> <li>• Proposed level of growth around Portskewett will overwhelm the village. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements.</p> <p>Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny</p>

	<p>and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>
<b>LPA Recommendation</b>	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date; to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>• Dwr Cymru serve each of the Tier 1 – 4 settlements listed with a clean water supply, and all settlements listed aside from Llanvair Discoed and Penallt with a public sewerage system. Combination of reinforcement works through the Capital Investment Programme and developer contributions will ensure growth can be delivered. Further developments in Goytre and Usk and Dingestow, Little Mill, Tintern, Trellech and Pansy may need to be delayed until such time that there has been a future capital investment AMP scheme, or is developer funded. [Dwr Cymru]</li> <li>• Spatial distribution strategy is speculation without more information on viability and capacity for settlements’ infrastructure to absorb growth. [Abergavenny Town Council]</li> </ul>
<b>LPA Response</b>	Dwr Cymru Welsh Water comments are reflected in the site allocation policies and delivery trajectories. We welcome ongoing dialogue with Dwr Cymru as the plan progresses. Further details on infrastructure delivery arrangements are set out in the Infrastructure Delivery Plan.
<b>LPA Recommendation</b>	No change required.
<b>Phosphates</b>	<ul style="list-style-type: none"> <li>• From a river quality perspective, only Raglan WwTW has phosphorous removal. Schemes to introduce phosphorus removal at Llanfoist and Monmouth WwTWs have been announced and are expected to be delivered before the end of 2025. Llanarth WwTW will also see a phosphate permit introduced by the end of AMP7. NRW are in the process of undertaking a review of existing WwTW permits, and once completed we will work with NRW to determine whether any further WwTWs require phosphorous removal to be introduced. [Dwr Cymru]</li> <li>• Question the proposed timescale for addressing the issues of phosphate treatment for Abergavenny and the impact it will have on delaying the delivery of the RLDP. [Abergavenny Town Council, Abergavenny &amp; Crickhowell FoE]</li> <li>• On the basis that improvement to both the Monmouth and Llanfoist treatment works to remove phosphates are planned it is appropriate to identify new affordable housing led allocations in both Monmouth and Abergavenny. [WG]</li> <li>• Concerns over the lack of certainty regarding the improvement works at Llanfoist WwTW. Satisfied that the approach for the Upper River Wye catchment is sufficiently precautionary. [NRW]</li> </ul>
<b>LPA Response</b>	The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers, farmers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to Dwr Cymru’s planned improvements to waste water treatment works and NRW’s review of permits. There is commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW’s review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.

<b>LPA Recommendation</b>	Continue to liaise with the relevant organisations in relation to phosphate issues.
<b>Cross Boundary Issues</b>	<ul style="list-style-type: none"> <li>Impact on PS on transport carbon emissions and capacity of development allocated at Chepstow to identify, fund, and mitigate development impacts on transport demand will need to be assessed in detail. Need to take account of the proposed development within the FoD Local Plan where it closely juxtaposes with Monmouthshire. [Gloucestershire CC, The Chepstow Society]</li> <li>Need to understand the regional picture and context in relation to housing growth [Torfaen CBC]</li> <li>No account appears to have been taken of the development and traffic from the continuing expansion of Gloucestershire. [Private Individual]</li> </ul>
<b>LPA Response</b>	The Council has, and continues to work collaboratively with our neighbouring authorities and the wider South East Eales region and English border authorities in preparing our respective LDPs which enables consideration of cross border issues, including levels of growth and the spatial distribution of development. At the regional level, collaboration between the 10 LPAs in South East Wales takes place via various regional groups including South East Wales Strategic Planning Group (SEWSPG), South East Wales Planning Officer Society (SEWPOS) and South Wales Regional Aggregates Working Party (SWRARWP). Through SEWSPG the LPAs work collaboratively on the preparation of a joint evidence base to inform RLDPs and the emerging SDP.
<b>LPA Recommendation</b>	No change required.
<b>Infill</b>	<ul style="list-style-type: none"> <li>S2 should be reworded from 'minor infilling between existing buildings' to 'filling in a small gap between existing dwellings. [Llanarth CC, Raglan CC, Private Individual]</li> </ul>
<b>LPA Response</b>	There may instances where infilling between existing buildings that are not dwellings will be acceptable.
<b>LPA Recommendation</b>	No change required.
<b>Secondary Settlements</b>	<ul style="list-style-type: none"> <li>Objection to the RSS figure being indicative with potential to accommodate growth from each of the settlements in either Raglan Penperlleni and Usk. [Raglan CC, Raglan Village Action Group, Usk Civic Society]</li> <li>There should be no significant expansion of RSS. [Private Individuals x 3]</li> <li>RLDP should look to maximise development at Raglan. [BB3 Ltd, Manor Farm Partnership, Richborough Estates, Edenstone, Private Individuals x 3]</li> <li>Usk is ranked 5th out of all the settlements in Monmouthshire and its proportion of growth should recognise this. [Private Individual, Johnsey Estates]</li> <li>Penperlleni can accommodate growth. [B&amp;DW]</li> </ul>
<b>LPA Response</b>	The Deposit Plan sets out the level of growth to be accommodated in the Secondary Settlements (Tier 2). Collectively the settlements of Penperlleni, Raglan and Usk will contribute 6% of housing growth and 8% employment growth. This is considered to be an acceptable and proportionate level of growth given the settlements position in the settlement hierarchy as tier 2 settlements, reflecting the findings of the Sustainable Settlement Appraisal (SSA). Further details of the methodology can be found in the Sustainable Settlement Appraisal.
<b>LPA Recommendation</b>	No change required.
<b>SSA</b>	<ul style="list-style-type: none"> <li>Population figure given for Gwehelog appears implausible. [Raglan CC]</li> <li>SSA is flawed in its methodology as only says if infrastructure exists, not if there is capacity in the infrastructure. [Private Individuals x 3]</li> </ul>



	<ul style="list-style-type: none"> <li>• Question whether Caldicot and Severnside be grouped as a cluster. Term Severnside should not be used. [Private Individuals x 3]</li> <li>• SSA makes no reference to how proposed infrastructure could potentially enhance the sustainability of settlements. [Edenstone]</li> <li>• SSA is flawed in its assessment of Chepstow. [Cllr Christopher Edwards]</li> </ul>
<b>LPA Response</b>	<p>The methodology used for the Sustainable Settlement Appraisal (SSA) is based on the approach set out in the draft South East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal Paper, with some amendments for local considerations. The methodology has regard to the Development Plans Manual and provides a basis for regional consistency and is therefore considered to be an acceptable basis for the RLDP settlement hierarchy. In accordance with Planning Policy Wales 12, the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for most new development including housing and employment provision. The criteria used for identifying clusters is set out in section 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary Settlement). The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot. This approach is consistent with the methodology and PPW12.</p> <p>Infrastructure enhancements details are set out in the Infrastructure Delivery Plan.</p> <p>The population figures contained within the SSA are taken from the 2021 Census. Up to date official population figures for each settlement are not available at the lower geographical scale. For the purposes of the appraisal, population figures for the smaller settlements are derived from best possible estimates using counts of dwellings which fall within the development boundary of a settlement, as defined in the Adopted LDP, where this exists, or counts of dwellings which make up a nucleus of a settlement. The average household size figure from the 2021 Census for the output area in which the settlement is located has then been applied to the dwelling count.</p>
<b>LPA Recommendation</b>	No change required.
<b>Monmouth</b>	<ul style="list-style-type: none"> <li>• HBF concerned at the approach taken to Monmouth and believe a solution will be available within the Plan period. [HBF]</li> <li>• Highly likely a phosphate solution will be provided to allow the release of development in Monmouth in the short term. Therefore, development should be allocated in Monmouth. Plan is unsound otherwise. [Hallam Land Management, Taylor Wimpey, Redrow Homes, Richborough Estates, SOUL, Cllr Louise Brown, Vistry Group, Edenstone]</li> <li>• Concerned if Monmouth ‘bonus sites’ come forward that will increase the overall housing provision. [Private Individual]</li> <li>• Approach to treat Monmouth sites as ‘bonus sites’ is sensible. [Taylor Wimpey, Private Individual]</li> </ul>
<b>LPA Response</b>	<p>The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government’s response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW’s planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government’s confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.</p>
<b>LPA Recommendation</b>	In accordance with the October 2023 Council Report, the Deposit Plan allows for growth in Monmouth.

<b>Main Rural Settlements</b>	<ul style="list-style-type: none"> <li>• Question the level of growth attributed to Tier 3 settlements. Previous plan took a similar approach and failed to deliver. Requirement to deliver 50% affordable homes on these sites is likely to make delivery of these smaller sites less likely. [HBF, B&amp;DW]</li> <li>• Support distribution of growth according to the settlement hierarchy, however greater value should be placed on the Main Rural Settlements to accommodate growth. [Llanover Estates, Leathdunn Ltd, Marston’s PLC, The Coldbrook Estate]</li> <li>• Little Mill should be higher placed in the hierarchy recognising its functional link to larger settlements and underscoring as part of the SSA. [MHA]</li> <li>• There should be no significant expansion of the rural settlements. [Private Individuals x 2]</li> <li>• Deposit plan should identify the number of new homes proposed in Tier 3. [WG]</li> <li>• Trellech – until or unless the WwTW is upgraded and capacity adequately increased, do not consider the area has the infrastructure necessary to accommodate further development. [NRW]</li> <li>• RLDP should maximise site allocations in Main Rural Settlements. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3]</li> <li>• Scale of growth in Main and Minor Rural Settlements conflicts with net-zero aims. [Llangybi Fawr CC, Private Individual]</li> <li>• Growth is focussed in the wrong locations and should be dispersed across a wider area to address affordability. [Private Individual]</li> <li>• Llangybi should not be categorised as a suitable rural settlement for future growth. [Private Individual, Llangybi Fawr CC]</li> <li>• Object to Llanvair Discoed being identified as a Main Village as the infrastructure and services are not sufficient to cope with new development. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Collectively, Tier 3 (Main Rural Settlements) and Tier 4 (Minor Rural Settlements) account for 9% of the County’s housing growth including new allocations, windfall and infill allowances and completions between 2018 – 2024. New allocations are only proposed in Tier 3 settlements (Main Rural) reflecting their position in the settlement hierarchy and account for 113 homes over six new allocations and 15 homes within an LDP Rollover site. Any growth in Tier 4 settlements (Minor Rural Settlements) is from any completions that have taken place between 2018 – 2024 and estimated contribution to infill developments based on past trends. This is considered to be an acceptable level of growth in our most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Site specific allocations and the tier they are situated in is set out in policies HA1 – HA18, along with a summary of the spatial distribution of housing provision in Table 2 of the Deposit Plan. Further details on the housing figures are also set out in the Housing Background Paper.</p> <p>There are no new allocations proposed in Trellech and any infill/windfall proposals that come forward would be subject to consideration of the RLDP policy framework and standard Development Management consultations.</p>
<b>LPA Recommendation</b>	<p>No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date, changes to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.</p>
<b>Minor Rural Settlements</b>	<ul style="list-style-type: none"> <li>• Question the level of growth attributed to Tier 4 settlements. Previous plan took a similar approach and failed to deliver. Requirement to deliver 50% affordable homes on these sites is likely to make delivery of these smaller sites less likely. [HBF, B&amp;DW]</li> <li>• There should be no significant expansion of the rural settlements. [Private Individuals x 2].</li> <li>• Deposit plan should identify the number of new homes proposed in Tier 4. [WG]</li> <li>• RLDP should maximise site allocations in Minor Rural Settlements. [BB3 Ltd, Manor Farm Partnership, Private Individuals x 3]</li> </ul>

<b>LPA Response</b>	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Collectively, Tier 3 (Main Rural Settlements) and Tier 4 (Minor Rural Settlements) account for 9% of the County's housing growth including new allocations, windfall and infill allowances and completions between 2018 – 2024. New allocations are only proposed in Tier 3 settlements (Main Rural) reflecting their position in the settlement hierarchy and account for 113 homes over six new allocations and 15 homes within an LDP Rollover site. Any growth in Tier 4 settlements (Minor Rural Settlements) is from any completions that have taken place between 2018 – 2024 and estimated contribution to infill developments based on past trends. There are no new allocations proposed for Tier 4 settlements. This is considered to be an acceptable level of growth in our most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Site specific allocations and the tier they are situated in is set out in policies HA1 – HA18, along with a summary of the spatial distribution of housing provision in Table 2 of the Deposit Plan. Further details on the housing figures are also set out in the Housing Background Paper.
<b>LPA Recommendation</b>	No changes to the Settlement Hierarchy required, however, update Policy S2 to include housing and employment monitoring data up to the 1st April 2024 base date, changes to reflect growth will now be allowed in the River Wye Catchment area following Dwr Cymru Welsh Water investment and Welsh Government advice and increases in the flexibility rate from 10% to 15%.
<b>Uncertainties</b>	<ul style="list-style-type: none"> <li>Decisions yet to be made on viability and need for candidate sites. Difficult to comment on spatial distribution without knowing where the sites will be and if they are suitable. [Abergavenny Transition Town]</li> </ul>
<b>LPA Response</b>	The level of information contained in the Preferred Strategy was appropriate for that stage in the Plan process. The Deposit Plan sets out the detailed policies and site allocations.
<b>LPA Recommendation</b>	No change required.
<b>Windfalls/Infill sites</b>	<ul style="list-style-type: none"> <li>Too much reliance on windfall sites. This should be redistributed. [Llanover Estates, Richborough Estates, Vistry Group, The Coldbrook Estate]</li> <li>Support the HPS approach to windfalls, however, this should be further reduced by 50%. [B&amp;DW]</li> <li>Rural small site reduction of 20% should be applied to the whole of the small site allowance. [B&amp;DW, Candleston Homes]</li> <li>Important to draw settlement boundaries to allow for flexible growth. [Tompkins Thomas Planning]</li> </ul>
<b>LPA Response</b>	The Housing Background Paper sets out the approach taken to windfall allowances in the preparation of the Deposit Plan. As with the Preferred Strategy, the Deposit Plan includes a windfall allowance based on the findings of the Housing Potential Study. This contributes approximately 230 units to the housing figures, less than an allowance based on past trends, which would contribute 366 homes to the housing figures. In this respect, a conservative approach to windfall provision has been taken. Similarly, a reduced contribution has been factored in for infill developments. The past trend rate of infill developments has been reduced by 15% to reflect the plan-led system and infill opportunities reducing.
<b>LPA Recommendation</b>	In accordance with details set out in the Housing Background Paper, base windfall allowances on the findings of the Housing Potential Study and the infill allowance on a reduced past trend rate.
<b>Existing Commitments</b>	<ul style="list-style-type: none"> <li>Sites that cannot demonstrate deliverability should be removed from the process. [Melin Homes, Vistry, Llanarth Estates, Candleston Homes, Sero Homes, Sero, Private Individuals x 2]</li> <li>Non-delivery allowance of 20% should be applied to existing commitments. [Redrow Homes, B&amp;DW, Candleston Homes, Taylor Wimpey]</li> </ul>

<b>LPA Response</b>	The ability to demonstrate deliverability and viability has formed an integral part of the candidate site assessment process, with sites removed from the process where insufficient evidence has been provided. In line with the Development Plans Manual (DPM) a non-delivery allowance has been applied to the existing commitments element of the housing supply components. The DPM allows for two approaches to this; either as a percentage across the overall land bank or sites can be discounted individually. Given the relatively small number of sites involved and based on Officer knowledge of sites, it has been decided to discount 4 sites which it is considered that there is insufficient information to demonstrate that they will come forward during the Plan period. Further details can be found in the Housing Background Paper.
<b>LPA Recommendation</b>	No change required.
<b>Strategic Sites</b>	<ul style="list-style-type: none"> <li>• Delivery of Caldicot East site is ambitious within the remaining plan period. Additional allocations elsewhere would de-risk the plan. [Llanover Estates, Vistry, The Coldbrook Estate]</li> <li>• Concerns regarding the size and provision of Abergavenny East. Advise further consideration is given to allocating a smaller allocation to provide range and choice and deliverable allocations. [Edenstone Homes, Bellway Homes, Tompkins Thomas Planning]</li> <li>• Concentration of strategic sites is a high-risk strategy. Range of smaller sites to help mitigate against any delay associated with larger more complex strategic sites should be considered. [Redrow Homes, Private Individuals x 2]</li> </ul>
<b>LPA Response</b>	<p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County.</p> <p>Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>
<b>LPA Recommendation</b>	No change required.
<b>New Settlement</b>	<ul style="list-style-type: none"> <li>• Disappointed that a new settlement solution has been deferred for consideration through the SDP. [Melin Homes, Redrow Homes, Llanarth Estates, Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individuals x 2]</li> </ul>
<b>LPA Response</b>	Paragraph 3.53 of PPW12 states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.”
<b>LPA Recommendation</b>	No change required.

<b>General</b>	<ul style="list-style-type: none"> <li>• Specifically allowing Gypsy and Traveller sites outside of tiers 1 to 4 is illegal discrimination. All locations should be available. [Private Individual]</li> <li>• Provision of affordable housing should be influenced by the availability of local employment. [Private Individual]</li> <li>• How will Council ensure that the employment land allocated brings forward suitable jobs? [Private Individual]</li> <li>• Green wedge designations should be considered early in the process. [Private Individual]</li> <li>• FW2040 notes large scale projects should consider District Heat Networks. [Private Individual]</li> <li>• Need to recognise brownfield sites in non-rural isolated locations concerning rural economies. [Private Individual]</li> <li>• Sewerage infrastructure is inadequate and needs upgrading before more houses are built to avoid further deterioration of water quality in rivers. [Private Individual]</li> <li>• Providing a commensurate amount of employment land to housing does not ensure the creation/relocation of businesses. [Private Individual]</li> <li>• Too much focus on house building rather than creating nice places to live. [Private Individual]</li> <li>• Spatial relationship between settlements outside of Tier 4 and their purpose to food production should be discussed. [Our Food 1200]</li> </ul>
<b>LPA Response</b>	<p>All locations included Tiers 1 – 4 and outside of the Settlement Tiers are available for consideration for Gypsy and Traveller sites subject to satisfying the detailed policy framework of the RLDP.</p> <p>In accordance with national guidance the provision of affordable housing is linked to the evidence base set out in the Local Housing Market Assessment. The RLDP does, however, seek to achieve a balance between the provision of homes and employment opportunities.</p> <p>The Green Wedge Assessment has informed the designation of green wedges throughout the County and has been considered as part of the site selection process.</p> <p>Consideration for District Heat Network opportunities has been undertaken as part of the Monmouthshire Renewable and Low Carbon Energy Assessment (October 2020), which identified limited potential for district heat networks. However, the Council has introduced policy requirements for dwellings to be built to net zero carbon standards, including the incorporation of renewable energy generation technologies and a specific requirement to not connect to the gas network (NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S8 – Site Allocation Placemaking Principles).</p> <p>The RLDP seeks to support economic growth through the inclusion of an overarching strategy and potential jobs growth figure that could be supported by the population and housing growth planned over the Plan period. The RLDP will seek to achieve this through the allocation of a range of B use class employment sites and a supportive policy framework for jobs that will be delivered other sectors such as tourism, leisure food, retail and agriculture. It is recognised that the RLDP is only one mechanism for delivering on economic growth. The Economy, Employment and Skills Strategy (EESS) sets out the Council’s direction of travel and action plan for achieving economic growth.</p> <p>In accordance with national guidance, the RLDP allows for consideration of rural enterprise dwellings outside of Tier 1 – 4 settlements. Similarly, brownfield development opportunities outside of defined settlement boundaries would be considered on their merits and assessed against the RLDP policy framework.</p> <p>The RLDP has been prepared in consultation with Dwr Cymru Welsh Water, NRW and other relevant organisations to follow the relevant guidance and delivery programme to the phosphates issue.</p>
<b>LPA Recommendation</b>	No change required.
<b>Sites Promoted in response to question 4</b>	<ul style="list-style-type: none"> <li>• Llanover Estates – CS0139 – Former petrol station, Llanover [Llanover Estates]</li> <li>• Llanover Estates – CS0140 - Land of Rhyd-y-Meirch [Llanover Estates]</li> <li>• MHA – CS0215 – Land at Llanellen [MHA]</li> <li>• MHA – CS0214 – Land at Churchfields, Devauden [MHA]</li> </ul>

	<ul style="list-style-type: none"> <li>• MHA – CS0101 – Land at Parklands, Llandogo [MHA]</li> <li>• BB3 Ltd – CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre [BB3 Ltd]</li> <li>• Leathdunn Ltd – CS0036 – West of B4293, Devauden [ Leathdunn Ltd]</li> <li>• Taylor Wimpey – CS0078 – Land adj Croft Y Bwla [Taylor Wimpey]</li> <li>• CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual]</li> <li>• Manor Farm Partnership - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Manor Farm Partnership]</li> <li>• Johnsey Estates Ltd – CS0113 – CS0113 – Castle Oaks (Site D) [Johnsey Estates Ltd]</li> <li>• Johnsey Estates Ltd – CS0282 – NW Burrium Gate [Johnsey Estates Ltd]</li> <li>• Vistry Group – CS0277 – Drewen Farm [Vistry Group]</li> <li>• Marston’s Plc – CS0077 – Piercefield Public House, St Arvans [Marston’s Plc]</li> <li>• Taylor Wimpey PLC – CS0253 - Ifton Manor (Site A) [Taylor Wimpey]</li> <li>• Private Individual - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual]</li> <li>• Edenstone – CS0205 - Land at Usk Road, Raglan [Edenstone]</li> <li>• Private Individual – CS0027 &amp; CS0028 Llanellen Court Farm [Private Individual]</li> <li>• Private Individual - CS0232 – Land west of Red Llandes, Shirenewton, CS0016 – Land East of Little Mill, CS0278 – Land west of Raglan, CS0168 – Land adj Merlin Close, Rogiet, CS0229 – Land opposite Chepstow Garden Centre. [Private Individual]</li> <li>• Private Individual – CS0151 – Former Troy Rail Yard [Private Individual]</li> <li>• Edenstone – CS0189 – Land at Tudor Road [Edenstone]</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
<b>LPA Recommendation</b>	See the Candidate Site Assessment Report for Candidate Site recommendations.

### 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
<b>Support policy</b>	<ul style="list-style-type: none"> <li>• The Canal &amp; River Trust fully support policy noting it is in line with their own guidance [Canal &amp; River Trust].</li> </ul>

	<ul style="list-style-type: none"> <li>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].</li> <li>Support the principle of the policy and recognise the importance of placemaking in good design [Redrow Homes].</li> <li>Support policy in principle and consider site promoted could be carried out with full regard to the aspiration of the policy [Grove Farm Estates &amp; Development].</li> <li>Support policy, particularly criterion iv) [Cllr Louise Brown].</li> <li>Agree high quality design is essential [Tompkins Thomas Planning]</li> <li>Broadly agree with the wording and thrust of policy, consider site promoted will achieve the aspirations of this policy [Marston's PLC].</li> <li>Site promoter prides itself on design excellence and providing high quality homes that would align with this policy [Edenstone].</li> </ul>
<b>LPA Response</b>	Support for Strategic Policy S3 is welcomed.
<b>LPA Recommendation</b>	Minor updates have been made to Strategic Policy S3 one relates to update of some wording for consistency in relation to mix of uses, sustainable travel and the other to further emphasise priorities of the Deposit Plan with regard to responding to climate change, however none of the changes are considered to be significant.
<b>Changes suggested to policy wording</b>	<ul style="list-style-type: none"> <li>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 &amp; David Wilson Homes].</li> <li>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].</li> <li>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]</li> <li>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]</li> </ul>
<b>LPA Response</b>	Comments noted. It is recognised that an appropriate mix of uses would not be applicable to all sites and scenarios.
<b>LPA Recommendation</b>	Minor updates have been made to the wording of Strategic Policy S3. With respect of criterion ii) specifically it is recognised that an appropriate mix of uses would not be applicable to all sites and scenarios and therefore an element of flexibility has been added to account for this. Additional minor updates to wording have been made for consistency in relation to sustainable travel and to further emphasise priorities of the Deposit Plan with regard to responding to climate change, however none of the changes are considered to be significant.
<b>Support prominence given to GI.</b>	<ul style="list-style-type: none"> <li>Welcome proposals for placemaking and the prominence given to Green Infrastructure in design considerations [Abergavenny Town Council].</li> </ul>
<b>LPA Response</b>	Support noted.
<b>LPA Recommendation</b>	No change required.

<b>Development to be built to net zero carbon</b>	<ul style="list-style-type: none"> <li>Disappointed there is no commitment for future development to build to net zero carbon to meet the declared climate crisis objectives [Abergavenny Town Council].</li> </ul>
<b>LPA Response</b>	Comment noted. One of the core purposes of the Council is to become a zero-carbon County. Policy NZ1 Monmouthshire Net Zero Carbon Homes has been included within the Deposit Plan to reflect this aspiration. Further detail of how this will be achieved is set out in the detailed policy framework of the Deposit Plan.
<b>LPA Recommendation</b>	Additional wording has been added to S3 to emphasise the need to respond to climate change.
<b>Question whether approach to design should be led by GI</b>	<ul style="list-style-type: none"> <li>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 &amp; District Civic Society and Abergavenny Transition Town].</li> <li>Note S3 is supplemented by S17 relating to GI, suggest a further strategic policy is equally needed covering the built environment and heritage [Abergavenny &amp; District Civic Society].</li> </ul>
<b>LPA Response</b>	Comments noted, policy S3 allows for flexibility, while a GI-led approach will be appropriate for most sites and proposals it is recognised in certain contexts it would not be relevant. With regard to the suggested need for an additional Strategic Policy for the built environment and heritage it is considered criterion iv) along with the detailed supporting policies are sufficient.
<b>LPA Recommendation</b>	No change required.
<b>Terms used</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>
<b>LPA Response</b>	Comments noted. The Design Commission for Wales have been and continue to be involved in helping to shape the Strategic Sites progression. It would not be practical, nor would there be resource available to insist that they review and approve all development in any given area.
<b>LPA Recommendation</b>	No change required.
<b>Impact on viability</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. Strategic S3 provides an overarching framework for sustainable placemaking and high quality design, agree that the deliverability and viability of sites is of importance.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>Comment noting new housing developments are being approved with inadequate road systems [Private individual x 1].</li> </ul>



	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Question relating to whether CADW, National Trust etc are consulted on applications [Private individual x 1].</li> <li>• 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].</li> <li>• Note development of greenfield sites is not sustainable, reference given to the Bayfield site [Private individual x 1].</li> <li>• Suggestion the policy is a marketing ploy to gain agreement [Private individual x 1].</li> <li>• Sustainable development cannot acceptably replace mature and biodiverse ecosystems [Private individuals x 2].</li> <li>• Focus on building houses not actually making areas a nice place to live [Private individual x 1].</li> </ul>
<p><b>LPA Response</b></p>	<p>Infrastructure requirements are dealt with individually for each of the site allocations and are also included in an Infrastructure Delivery Plan. A specific Strategic Policy in relation to Infrastructure is also included, along with other detailed policies within the framework of the Deposit Plan in relation to sustainable transport.</p> <p>Ecology matters are dealt with both strategically from the outset of determining site allocations and at the site specific planning application stage. This approach ensures any sites included within the plan do not have any major constraints that could prevent development coming forward at a later date.</p> <p>A Housing Mix policy is included in the Deposit RLDP the supporting text of which recognises that homes should be designed so that they are flexible and responsive to the changing needs of the occupants over their lifetime.</p> <p>The Plan recognises that there are limited opportunities within Monmouthshire for brownfield development. The Bayfield site specifically referred to is no longer included as an allocation within the Plan.</p> <p>This strategic policy provides an overarching framework for sustainable placemaking and high quality design and will ensure development proposals reflect this aim.</p> <p>The Deposit RLDP reflects National Guidance set out in PPW ensuring that development does not cause any significant loss of habitats and populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.</p> <p>The aim of this strategic policy is to ensure new development incorporates the principles of sustainable placemaking and good design which will in turn deliver a wide range of social, economic, environmental and health and well-being benefits for local communities and the County as a whole.</p>
<p><b>LPA Recommendation</b></p>	<p>No change required.</p>

**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
<b>Welcome Climate Change aims</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Welcome the promotion of water efficiency measures and minimising the impact on water resources and quality. [Dwr Cymru]</li> <li>• 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]</li> <li>• Welcome policy but reference to public transport via electric buses and protection of GI and open space should be added. [Cllr Louise Brown]</li> </ul>
<b>LPA Response</b>	Support welcomed. Detailed viability assessments that take account of the Council's climate change aspirations have been undertaken on the proposed site allocations. The policy refers to maximising opportunities for public transport use and ensuring the provision of electric vehicle charger infrastructure. Strategic Policy S9 – Sustainable Transport also covers the promotion of all forms of sustainable transport methods. Criterion viii) of S4 sets out strategic requirements for the inclusion of green infrastructure.
<b>LPA Recommendation</b>	No significant changes required to the overarching policy principles; however, minor wording changes have been made.
<b>Definition/viability</b>	<ul style="list-style-type: none"> <li>• Further guidance required on the definition of net zero developments and how they will be measured. [B&amp;DW, Vistry, Bellway Homes]</li> <li>• Further guidance regarding the targets and measures is 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 &amp; Developments, Redrow Homes, Richborough Estates, Barwood Development Securities Ltd, Edenstone, Private Individuals x 2,]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	Policy NZ1 – Monmouthshire Net Zero Carbon Homes of the Deposit RLDP and the associated evidence base set out the details of the Council's net zero requirements and how it will be measured. Detailed viability assessments that take account of the Council's climate change aspirations have been undertaken on the proposed site allocations.
<b>LPA Recommendation</b>	Refer to Policy NZ1 – Monmouthshire Net Zero Carbon Homes for further details.
<b>Further details/evidence needed</b>	<ul style="list-style-type: none"> <li>• More rigorous policy on the energy efficiency of buildings and construction required. [Abergavenny &amp; District Society, Private Individuals x 4]</li> <li>• Little reference to building design or recommendations for low energy solutions to facilitate the reduction in emissions for residential developments. [Abergavenny Town Council]</li> <li>• New development can only play a part in not adding to the causes of climate change. [HBF, B&amp;DW]</li> <li>• Should include policies elsewhere aimed at reducing car use and commuting. [Private Individual]</li> <li>• Undertake further work on the contribution renewable energy can make to assist with climate change and decarbonisation. [WG]</li> <li>• Policy could go further and seek to improve, where possible, flood risk to existing communities. The SFCA could consider opportunities for these to be assessed at a local/site level. [NRW]</li> </ul>

<b>LPA Response</b>	<p>The Deposit Plan introduces a policy NZ1 – Monmouthshire Net Zero Carbon Homes, which sets out details of the energy efficiency requirements of new homes.</p> <p>In addition, there are multiple policies seeking to reduce car usage including Policies HA1 – HA18 site allocation policies setting out site specific active travel requirements, Strategic Policy S3 Sustainable Placemaking &amp; High Quality Design, Strategic Policy S13 – Sustainable Transport and ST1 – Sustainable Transport Proposals.</p> <p>Section 10 of the Deposit Plan sets out details of the contribution Monmouthshire can make to assist with climate change and decarbonisation including established renewable energy generation targets. This has been informed by the background evidence undertaken by the Carbon Trust on the Monmouthshire Renewable Energy and Low Carbon Assessment (October 2020) and Stakeholder Interviews and Workshops undertaken in 2024. The findings of this are set out in the Renewable Energy Background Paper and have been used to inform the policy approach taken in the Deposit Plan. Flood risk considerations are considered to be adequately covered by S4 and national policy.</p>
<b>LPA Recommendation</b>	No significant changes required to the overarching policy principles, however, minor wording changes have been made.
<b>Site Specific</b>	<ul style="list-style-type: none"> <li>• Ensure all development is compliant with TAN15. [WG]</li> <li>• To achieve climate change requires sustainable communities that do not require residents to have to travel excessively to access facilities. [Llangybi Fawr Community Council]</li> <li>• County Farms to the south of the County should be considered for solar farms. [SOUL]</li> <li>• Sifting out of candidate sites based on TAN 15 must be less didactical and more flexible. [F1 Real Estate Management Ltd]</li> <li>• 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]</li> <li>• SABs and SUDs need to be considered. [Private Individual]</li> <li>• Development in the south must take account of flood risk and the environmental impact of traffic. [Private Individual]</li> <li>• Increased traffic particularly the Hardwick Hill will affect health and the climate. [Private Individuals x 2]</li> <li>• Candidate sites need to be tested against policy principles. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>The site selection process has had full regard to the current TAN15 and flood management. All allocations will be required to approved by the SuDs Approving Body. Traffic levels and active travel links have been considered in relation to the site allocations and within the Strategic Transport Assessment. The County’s potential solar resource has been considered as part of the Renewable and Low Carbon Energy Assessment. This concludes that while the County has a significant potential solar resource, this is dispersed throughout the County in small parcels of land. Therefore, a criteria-based policy has been included in the Deposit Plan to allow the consideration of solar farm applications on a site-by-site basis. A solar allocation has, however, been made in Raglan at Raglan Enterprise Park (Policy CC2 – Renewable Energy Allocation).</p>
<b>LPA Recommendation</b>	No significant changes required to the overarching policy principles; however, minor wording changes have been made.
<b>RLDP contrary to policy</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• Building on greenfield sites goes against the policy to limit climate change and will increase the carbon footprint. [Private Individuals x 3]</li> <li>• Recent planning permissions, (e.g., Mabey Bridge) make no sense environmentally. [Private Individual]</li> </ul>

<b>LPA Response</b>	Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements. Cumulative impact of development throughout the County, including the Gwent Levels is considered as part of the Integrated Sustainability Assessment. In addition, there is a suite of policies in the Deposit Plan seeking to protect international designations in the County such as the Gwent Levels SSSI. The Mabey Bridge planning permission made use of a brownfield site in close proximity to Chepstow town centre and good public transport links via the train station.
<b>LPA Recommendation</b>	No change required.
<b>General</b>	<ul style="list-style-type: none"> <li>• Include reference to Objective 5 – Minerals and Waste in relation to Policy S4 Climate Change. [MPA]</li> <li>• Climate Change policy should be upfront. [Abergavenny Transition Town]</li> </ul>
<b>LPA Response</b>	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy. Similarly, the Plan should be read as a whole with policies being applied as necessary and not ordered in terms of priority.
<b>LPA Recommendation</b>	No change required.

## 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.

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Support policy</b>	<ul style="list-style-type: none"> <li>• Applaud provisions of policy – particularly the inclusion of ‘strategic utilities including; water and sewerage infrastructure’ [Dwr Cymru/Welsh Water].</li> <li>• Fully supportive of policy [The Canal &amp; 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.</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Support for S5 welcomed.

<b>LPA Recommendation</b>	With regard to comments relating to wastewater treatment works, an additional section has been included in the Key Issues, Challenges and Opportunities section in relation to water quality in Riverine Special Areas of Conservation. It is also recognised and noted in the Infrastructure Delivery Plan in relation to specific sites.
<b>Suggested changes to wording</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Suggest a change to wording in paragraph 5.21 replacing 'should' with 'must', noting this surely should be an obligation [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Minor updates have been made to the wording in response to the comments made. These include the deletion of 'to remedy deficiencies' and addition of 'to mitigate any likely adverse impacts' to the first sentence. Additional wording has been added to the third para to note this refers to planning 'agreements and' obligations. After it is acceptable in planning terms 'Such obligations may include' has been replaced with 'The requirements for such agreements/obligations will include consideration and appropriate provision of:'.
<b>LPA Recommendation</b>	No significant changes are required to the overarching policy principles, however, minor wording changes have been made as a result of comments submitted.
<b>Broadband and strategic utilities</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comment noted, there is no reference to broadband connections within the strategic policy. Detailed policy considerations for telecommunications, broadband and other digital infrastructure are set out in Policy IN1. Reference in the supporting text is made to Future Wales which notes new developments should include the provision of high-speed broadband infrastructure from the outset.
<b>LPA Recommendation</b>	No change required.
<b>Cultural facilities and strategic utilities</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comments noted. The infrastructure requirements of sites will be determined on a case-by-case basis. The strategic policy provides an overview of the types of infrastructure, facilities, services and related works that are necessary to make development acceptable.
<b>LPA Recommendation</b>	No change required.
<b>Road infrastructure</b>	<ul style="list-style-type: none"> <li>• State there is no mention of road infrastructure in policy [Cllr Louise Brown].</li> </ul>

	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. Transport infrastructure is included within the strategic policy. There are also other detailed policies within the Deposit Plan relating to sustainable transport and transport schemes. Policy ST5 identifies numerous transport schemes identified in the Local Transport Strategy the will be supported, including active travel, public transport improvements and road schemes.
<b>LPA Recommendation</b>	No change required.
<b>Health infrastructure</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The list of requirements is not ranked in any way.
<b>LPA Recommendation</b>	No change required.
<b>Education</b>	<ul style="list-style-type: none"> <li>Additional capacity in schools must be confidently delivered before or with any major new developments [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Comment noted. The use of trigger points for education contributions within S106 agreements will be considered with colleagues in the MCC Education Department.
<b>LPA Recommendation</b>	No change required.
<b>Infrastructure Plan</b>	<ul style="list-style-type: none"> <li>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 &amp; Private individuals x 2].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. An Infrastructure Delivery Plan has been produced and is included as an appendix to the Deposit Plan.
<b>LPA Recommendation</b>	No change required.
<b>Management companies</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted, it is considered that in some circumstances the use of management companies may be appropriate and therefore additional wording should be included. It should however be noted that it is the Councils preference for GI and open space to be adopted by MCC.

<b>LPA Recommendation</b>	Additional wording added to strategic policy to note this includes the use of management companies where appropriate.
<b>Adoption of infrastructure</b>	<ul style="list-style-type: none"> <li>Question whether wording in policy means that in no circumstance will the Council adopt any new infrastructure [Home Builders Federation].</li> </ul>
<b>LPA Response</b>	Comment noted. This doesn't appear to be evident in the wording of the strategic policy. Council departments will liaise with site promoters at the relevant time in relation to adopting any new infrastructure.
<b>LPA Recommendation</b>	No change required.
<b>Affordable Housing</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The delivery of affordable housing is a core priority of the Council and the RLDP, as such it is pertinent to ensure that affordable housing is brought forward at the appropriate percentage set out Strategic Policy S7. This should not be as a compromise to the overall site, other policies set out within the Plan and placemaking principles will still apply.
<b>LPA Recommendation</b>	No change required.
<b>Viability</b>	<ul style="list-style-type: none"> <li>Welcomes the commitment that due regard will be given to overall development viability and clarification that priority will be given to affordable housing [Vistry].</li> <li>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].</li> <li>Suggest if developers make so much money they can contribute more to the necessary infrastructure [Private individual x 1].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. Viability appraisals may also be requested for other proposals, detail is set out in the supporting text of the strategic policy.
<b>LPA Recommendation</b>	No change required.
<b>Infrastructure should come first</b>	<ul style="list-style-type: none"> <li>Infrastructure should always come first, suggest without it settlements will fail to thrive or fail completely [Llangybi Fawr Community Council].</li> <li>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].</li> </ul>

	<ul style="list-style-type: none"> <li>• Policy fails to mention the need to prevent any further development without the road and public transport infrastructure being in place [Cllr Louise Brown].</li> <li>• No infrastructure in place currently/infrastructure is inadequate, additional housing will exacerbate these issues[Private individuals x 3].</li> </ul>
<b>LPA Response</b>	Comments noted. An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
<b>LPA Recommendation</b>	No change required.
<b>Area specific</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Refer to Usk noting there is insufficient infrastructure, suggest improvements need to be made to the town before housing [Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.
<b>LPA Recommendation</b>	No change required.



<b>Other</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; District Civic Society].</li> <li>• 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].</li> <li>• Questions what is the provision/expectation for the developer to provide or support the cost of new infrastructure [Private individual x 1].</li> <li>• Note there are terrible links to Bristol via rail and bus with infrequent services [Private individual x 1]</li> <li>• Suggest there is no evidence or planning for the obligations listed under the policy [Private individual x 1].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Planning agreements and obligations are not usually needed specifically to contribute to the supply of aggregates and minerals. Detailed policy considerations in relation to aggregates and minerals are considered elsewhere in the Deposit Plan in S16 along with supporting Development Management policies.</p> <p>Reference is given within the strategic policy to strategic utilities including water and sewerage infrastructure.</p> <p>Reference is given to community and cultural facilities within the strategic policy and will be considered on a site-by-site basis.</p> <p>Reference is given to sustainable transport measures in Strategic Policy S6 – Infrastructure which would include contributions to public transport as necessary.</p> <p>Proximity to level crossings and safety measures is of importance and will be assessed on a site-by-site basis.</p> <p>The provision of infrastructure should not be as a compromise to the overall site, other policies set out within the plan and placemaking principles will still apply.</p>

	An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. The list of infrastructure requirements is not exhaustive nor ranked in any way.
<b>LPA Recommendation</b>	No change required.

## 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
<b>Support policy</b>	<ul style="list-style-type: none"> <li>• Welcome commitment to provide up to 1850 affordable homes by 2033 [Abergavenny Town Council].</li> <li>• 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 &amp; Private individuals x 2].</li> <li>• Strongly supports affordable housing-led sites [Welsh Government].</li> <li>• Welcome the target and the commitment, await further details [Abergavenny &amp; District Civic Society].</li> <li>• 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 &amp; Private Individual x 1].</li> <li>• 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].</li> <li>• Aspiration is supported in principle subject to the ongoing viability process [Richborough Estates].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Support policy as makes sense given the significant increase in local house prices recently [Private individual x 1].</li> <li>• Support policy noting if homes are to be built they should be affordable [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Support for the Strategic Policy S6 (now S7) is welcomed. Delivery of affordable housing continues to be a core priority of the RLDP. Additional detail has been added to the policy setting out how affordable housing will be delivered including the appropriate thresholds to account for different scales of development.
<b>LPA Recommendation</b>	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.
<b>Provision of 50% Affordable Homes</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; David Wilson Homes and Barratt and David Wilson Homes South Wales].</li> <li>• Monmouthshire Housing Association promoted the sites previously as 50/50 so position has not altered [Monmouthshire Housing Association].</li> <li>• Suggest 50% affordable housing risks creating social ghettos 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].</li> <li>• Suggest there should be over-provision of affordable housing to account for historic under-provision [Disability Advice Project].</li> <li>• 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].</li> <li>• 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 &amp; Bellway Homes]</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Need for flexibility in considering brownfield sites which typically have higher cost associated with demolition and site clearance [Private individual x 1].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>• Questions how the Council will deliver, measure and guarantee the number of affordable homes [Private individual x 1].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comments noted. The delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.
<b>LPA Recommendation</b>	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Council's approach to the delivery of affordable housing.
<b>Housing requirement</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comment noted, the housing requirement is considered in relation to Policy S1 in the Initial Report of Consultation.
<b>LPA Recommendation</b>	No change required.
<b>Local Housing Market Assessment (LHMA)</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	The LHMA Refresh 2022 – 2037 has been undertaken by officers in the Housing team using the approved methodology and included a number of informal meetings with officers in the Welsh Government Housing team to ensure the correct approach was being undertaken over the last few years. Monmouthshire County Council's Cabinet approved the LHMA Refresh 2022 – 2037 prior to submission to Welsh Government in May 2024. A response was received from Welsh Government in August 2024 noting some additional actions needed to be undertaken to the LHMA before it can be signed off by Welsh Government. This work is on-going.
<b>LPA Recommendation</b>	No change required.
<b>Land values and viability</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; David Wilson Homes].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Note affordable housing targets for open market schemes should not render those sites unviable, should be more flexibility in the final policy wording [Edenstone].</li> </ul>
<b>LPA Response</b>	Comments noted, delivery of affordable housing continues to be a core priority of the RLDP and furthermore is a corporate priority. Viability testing has been undertaken on all of the site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.
<b>LPA Recommendation</b>	Additional detail has been added to Strategic Policy S7 (formally S6) to provide clarity on the Councils approach to the delivery of affordable housing.
<b>Tenure neutral approach</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comment noted. It is recognised that homes for Social Rent and Low Cost Home Ownership provide for differing needs. The delivery option preferred by Monmouthshire County Council is not determined in the RLDP and will instead be set out in the Affordable Housing SPG.
<b>LPA Recommendation</b>	No change required.
<b>Lack of site in Monmouth/north of the County</b>	<ul style="list-style-type: none"> <li>• 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 &amp; 3 and creates significant concern for affordability in the future [Hallam Land Management &amp; Taylor Wimpey].</li> <li>• 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].</li> </ul>

<b>LPA Response</b>	Comments noted. The spatial constraint in the Monmouth area relating to phosphates has been removed since consultation on the Preferred Strategy and as a consequence there are now proposed site allocations in Monmouth which will provide affordable homes in the town.
<b>LPA Recommendation</b>	No change required.
<b>Site specific</b>	<ul style="list-style-type: none"> <li>Note sites being promoted CS0114 &amp; CS0115 can make an appropriate contribution to the affordable housing need [Johnsey Estates 2020 Ltd].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
<b>LPA Recommendation</b>	No change required.
<b>Bungalows</b>	<ul style="list-style-type: none"> <li>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]</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. The mix and tenure of affordable homes will be agreed with the Council's Housing team at the planning application stage, this will include bungalows where there is an evidenced need.
<b>LPA Recommendation</b>	No change required, the supporting text sets out information in relation to mix and tenure of affordable homes.
<b>Definition of affordable housing</b>	<ul style="list-style-type: none"> <li>No definition is provided on what an affordable home is [Private individuals x 2].</li> <li>Question what affordable housing is noting what is affordable to one, won't be for another [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Definitions of affordable housing are provided in the supporting text to Strategic Policy S7 (formally S6).
<b>LPA Recommendation</b>	No change required, the supporting text provides detail on definitions of affordable housing.
<b>Other</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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 &amp; District Civic Society].</li> <li>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 &amp; District Civic Society].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• No land allocations for self-build market and/or affordable housing in the Preferred Strategy [Cllr Louise Brown]</li> <li>• 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].</li> <li>• 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].</li> <li>• Should insist social housing is built first to see how fast developers step forward [Private individual x 1].</li> <li>• Suggest affordable houses are only being built for people on benefits or those moving over from Bristol [Private individual x 1].</li> <li>• 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].</li> </ul>
<p><b>LPA Response</b></p>	<p>Detailed policy considerations in relation to aggregates and minerals are considered elsewhere in the Deposit Plan in S16 along with supporting Development Management policies.</p> <p>It is not considered appropriate or necessary to refer to net zero carbon homes in the affordable housing policy. A specific policy relating to Net Zero Carbon Homes (NZ1) is included elsewhere in the Deposit Plan as a Development Management.</p> <p>Affordable homes are available to different households with differing needs including older households. A specific Specialist Housing Policy (H7) is also included in the Deposit Plan as a detailed Development Management Policy.</p> <p>The CPO of brownfield sites is considered to be outside of the remit of the RLDP process. The Affordable Housing Policy framework however provides support for affordable housing in appropriate locations and any development proposals for affordable homes on brownfield sites would therefore be considered on a site-by-site basis.</p> <p>The Affordable Housing Policy framework however provides support for affordable housing in appropriate locations and any development proposals for self-build affordable homes would therefore be considered on a site-by-site basis. Self-build market homes would need to be considered against the Housing policy framework set out within the RLDP.</p> <p>Viability testing has been undertaken on all of the proposed site allocations in the Deposit RLDP. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council. This assessment has been undertaken independently by a viability consultant on behalf of Monmouthshire County Council, viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. Different affordable housing thresholds are provided for other types of development and are set out in Strategic Policy S7.</p> <p>Viability appraisals may also be requested for other proposals, detail is set out in the supporting text of Strategic Policy S6 relating to Infrastructure. The viability testing of allocated sites includes consideration of the Council's net zero carbon requirements along with other necessary contributions and site-specific considerations. While these types of development may cost more from the outset developers can expect higher sale values.</p> <p>Details of the phasing of allocations including the timing of delivery of affordable housing to be agreed through trigger points in S106 agreements</p>

	<p>Affordable homes can be for Social Rent or Low Cost Home Ownership and provide for differing needs. Affordable Housing in Monmouthshire will only be allocated to people with a local connection to Monmouthshire. It should be noted that this is a policy approach outside of the remit of the RLDP which sits with Monmouthshire County Council's Housing team.</p> <p>New housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This approach is reflected in a specific housing mix policy within the RLDP. The affordable housing requirements in S7 must, however, be adhered to.</p>
<b>LPA Recommendation</b>	No change required.

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

A range of comments have been made on the preferred 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 allocations: Question 10 (Abergavenny East), Question 11 (Bayfield Chepstow) and Questions 12 (Caldicot East), as well as comments on these sites as part of the Candidate Sites 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. It was also suggested that 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
<b>Abergavenny East</b>	<ul style="list-style-type: none"> <li>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].</li> <li>Timescale for delivery 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].</li> <li>The Preferred Strategic site for Abergavenny would breach the existing defined Railway line and A465. The precise numbers that the strategic sites need to provide should be considered in relation to the number of homes 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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a



	<p>significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally.</p> <p>The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail details of which will be set out in a Statement of Common Ground between the Council and relevant parties.</p> <p>To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period.</p>
<p><b>LPA Recommendation</b></p>	<p>Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.</p>
<p><b>Caldicot East</b></p>	<ul style="list-style-type: none"> <li>• We note that the site in Caldicot is partially within areas of risk for flooding [NRW].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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 &amp; David Wilson Homes].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<p><b>LPA Response</b></p>	<p>Comments noted. At the time of the Preferred Strategy consultation Land to the east of Caldicot site (previously known as Caldicot East) was proposed for 925 homes within the plan period. This number has been reduced in the Deposit Plan to approximately 770 homes. Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community serving both the new development and nearby homes in both Caldicot and Portskewett.</p> <p>Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p> <p>The consideration of any designations (including ecological and heritage designations) and other constraints have been considered through the masterplanning process to date and referred to in the site allocation policy wording and supporting text.</p>
<p><b>LPA Recommendation</b></p>	<p>Retain Land to the East of Caldicot as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 - Land to the east of Caldicot.</p>

<p><b>Bayfield /Chepstow</b></p>	<ul style="list-style-type: none"> <li>• Chepstow will have enhanced pressure from Forest of Dean developments [ Cllr Louise Brown].</li> <li>• 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].</li> <li>• 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].</li> <li>• Traffic congestion in Chepstow will affect the viability of developments in SE Wales. Chepstow requires significant improvement to road infrastructure [Private Individual x1].</li> <li>• 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].</li> <li>• Land south of Mounton Road is Preferred Site [Private Individual x1].</li> <li>• 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 its views from the public vantage points are retained [Private Individual x1].</li> </ul>
<p><b>LPA Response</b></p>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes were agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed use had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p> <p>A Green Wedge Assessment has been undertaken which includes an assessment of the appropriateness of existing Green Wedges, including that at Chepstow. The review concluded that on the land for Mounton Road the tree belt along St Lawrence Lane forms a strong boundary to land to the south-west, and the A48 forms a boundary to the south-east, limiting the impact that development at Mounton Road would have on adjacent land and on the remaining gap between Chepstow and Pwllmeyric.</p> <p>A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire’s transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the ‘Sustainable Transport Hierarchy’. An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for the site.</p> <p>To ensure the Mounton Road site delivers on key priorities such as preservation of its grade II listed setting parkland and transport and traffic mitigation solutions, placemaking requirements will be set out in Strategic Policy S8 and Policy HA3.</p>
<p><b>LPA Recommendation</b></p>	<p>A strategic site in Chepstow is considered necessary to the Council’s growth and spatial strategy - Chepstow is one of Monmouthshire’s Primary settlements and our spatial strategy is to direct growth towards Monmouthshire’s most sustainable settlements. New housing will deliver the Council’s objectives of providing affordable net zero carbon homes in the locality. Policy HA3 – Land at Mounton Road – of the Deposit Plan sets out placemaking and infrastructure requirements associated with this site. The Infrastructure Delivery Plan (IDP) will set out how this will be delivered.</p>
<p><b>Over reliance on Strategic sites</b></p>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• A greater diversity of sites should be put forward across a range of main settlements and sustainable rural settlements 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</li> </ul>

	growth, rural communities, and the rural economy as well as ensure ambitious affordable housing and net zero objectives are achieved [Marstons PLC].
<b>LPA Response</b>	<p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County.</p> <p>Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>
<b>LPA Recommendation</b>	No change required.
<b>Deliverability</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; David Wilson Homes].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County.</p> <p>Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). The change seeks to ensure that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a handful of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. An increased flexibility will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery</p>

	<p>of larger strategic sites which are more complicated to develop. A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>
<b>LPA Recommendation</b>	No change required.
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>• 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 [ Matherm Community Council, Cllr Louise Brown], Private Individual x1].</li> <li>• 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].</li> <li>• Train worker strikes and unreliable Bus services make commuting by car much more likely [ Cllr Louise Brown].</li> <li>• Development should be largely in the North of the County as the Heads of the Valleys Road infrastructure has been improved [ Cllr Louise Brown].</li> </ul>
<b>LPA Response</b>	<p>An Infrastructure Delivery Plan has been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the proposed allocated sites. Site specific considerations are included as an appendix to the Deposit Plan. Strategic Policy S6 sets out the Councils approach to Infrastructure requirements for development proposals. There are also other detailed policies within the Deposit Plan relating to sustainable transport and transport schemes. Policy ST5 identifies numerous transport schemes identified in the Local Transport Strategy that will be supported, including active travel, public transport improvements and road schemes.</p>
<b>LPA Recommendation</b>	No change required.
<b>Overdevelopment/growth too high</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Spatially, the Plan's growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot (including the Severnside area) account for 48% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies".</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.</p>

<b>LPA Recommendation</b>	No change required.
<b>Spatial Distribution</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Sites closed to existing shops and amenities should be supported [Private Individual x1].</li> <li>• Growth is focussed on the wrong location to tackle the affordability crisis [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Support for spatial distribution of growth is welcomed. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 85% of the level of housing growth proposed in these settlements.</p> <p>Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>
<b>LPA Recommendation</b>	No change required.
<b>Urban Sprawl</b>	<ul style="list-style-type: none"> <li>• Candidate Sites are grouped too closely together so current outlying villages identities and sense of community lost [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>The grouping of the Candidate Site submissions as shown in the Candidate Site Register is a record of where candidate sites have been received by the Council for consideration for allocation in the RLDP. The Council received over 150 candidate site submissions as part of the Second Call for Candidate Sites during July and August 2021, most of which have not been allocated in the Deposit Plan. Details of the recommendation for each candidate site are set out in the Candidate Site Assessment Report.</p>
<b>LPA Recommendation</b>	No change required. Refer to the Candidate Site Assessment Report for site specific candidate site recommendations.
<b>Limited Information</b>	<p>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].</p>
<b>LPA Response</b>	<p>The information set out in the Preferred Strategy was appropriate for that stage in the development plan process. Preferred Strategic Site Allocations were identified for the Primary Settlements, informed by a high-level assessment. The level and detail of evidence has increased as the Plan has progressed, with the Deposit Plan being supported by a robust and comprehensive evidence base including viability assessments.</p>
<b>LPA Recommendation</b>	No change required. Reader is directed to the RLDP evidence base for further details.
<b>Monmouth</b>	<ul style="list-style-type: none"> <li>• Object to the failure to provide for a strategic allocation within Monmouth [Redrow Homes, Hallam Land Management Ltd].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.
<b>LPA Recommendation</b>	In accordance with the October 2023 Council decision, the Deposit Plan allows for growth in Monmouth.
<b>Brownfield Sites</b>	<ul style="list-style-type: none"> <li>Role of brownfield sites in non-isolated rural locations should play an important role in the delivery of the growth strategy [Private Individual x1].</li> <li>Seems no real attempt has been made to identify brownfield sites in the area. Caldicot East is currently farmland or showground [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.
<b>LPA Recommendation</b>	No change required.
<b>Phosphates</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	<p>Welsh Government's response letter to the Preferred Strategy (2022) advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. The Welsh Government's confidence in the removal of this spatial and environmental constraint means the RLDP now allocates new affordable housing-led development within Monmouth.</p> <p>Since the phosphate guidance was introduced by NRW, Monmouthshire County Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to try to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. Planning applications are required to satisfy NRW's requirements to receive a favourable decision. However, some agricultural activities such as fertiliser spreading and muck spreading fall outside of the Council's control and are in part regulated by Natural Resources Wales (or the Environment Agency in England) and are in part unregulated. The Welsh Government is currently considering the introduction of additional controls over such activities.</p>
<b>LPA Recommendation</b>	In accordance with the October 2023 Council decision, the Deposit Plan allows for growth in Monmouth. More generally, the Council will continue to work collaboratively with NRW, Dwr Cymru and other relevant organisations to ensure the RLDP satisfies the relevant water quality requirements.

<b>Green Infrastructure</b>	<ul style="list-style-type: none"> <li>Essential that site selection and development design are informed by GI considerations [NRW].</li> </ul>
<b>LPA Response</b>	Agreed. GI considerations have played an important part in site selection and design with GI masterplan/GI assets and opportunities plan required as part of the ongoing site allocation masterplans. Furthermore, the Deposit Plan includes Policy GI1 – Green Infrastructure which requires development proposals to maintain, protect and enhance the integrity and connectivity of Monmouthshire GI network, as well as site specific GI requirements set out in Policies HA1 – HA18.
<b>LPA Recommendation</b>	Continue to make GI considerations a critical element of the ongoing site masterplanning process.
<b>Landscape</b>	<ul style="list-style-type: none"> <li>Given the high quality of Monmouthshire’s landscapes, detailed landscape assessment should be included in site assessments [NRW].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. Landscape assessments have informed the site selection process.
<b>LPA Recommendation</b>	Agree that landscape assessments should be included in site assessments and regard is given to NRW’s Ancient Woodland Guidance Note, where relevant.
<b>Protected Species/Sites</b>	<ul style="list-style-type: none"> <li>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]</li> <li>Proposals disruptive to local wildlife [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Site allocations have been made in consultation with our Ecologist and an Ecological Assessment is a requirement of the candidate site submission process. A Habitats Regulations Assessment has been undertaken on the Deposit Plan.
<b>LPA Recommendation</b>	Continue to liaise with MCC’s Ecologist and NRW.
<b>SPZs</b>	<ul style="list-style-type: none"> <li>Any development sites in SPZs need to connect to the public sewer network [Usk Civic Society].</li> </ul>
<b>LPA Response</b>	Comments noted. The Deposit Plan notes this at paragraph 11.13.8 and 11.13.9.
<b>LPA Recommendation</b>	No change required.
<b>Foul Drainage</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The areas for growth and site allocations have been prepared with regard to Dwr Cymru’s planned improvements to waste water treatment works and NRW’s review of permits.

	Commitment from DCWW to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.
<b>LPA Recommendation</b>	The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements. The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements.
<b>Health &amp; Wellbeing</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	The Deposit Plan and its allocations have been subject to Habitats Regulations Assessment which involved high-level traffic modelling to assess atmospheric pressures on the environmental designations in the County. This process did not raise any concerns in relation to the strategic sites in the south and in impacts of air pollution on the environmental designations in the south of the County. In addition, site specific air quality assessments will be required as part of the planning application process. Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities have had to be considered to meet the housing and employment requirements.
<b>LPA Recommendation</b>	No change required.
<b>Minerals &amp; Waste</b>	<ul style="list-style-type: none"> <li>• Delivery of strategic sites is reliant on the supply of aggregates and mineral products [Mineral Products Association].</li> <li>• Is imperative that new sites do not impact upon Mineral Safeguarding Areas [Mineral Products Association].</li> </ul>
<b>LPA Response</b>	Comments noted. Given the extensive mineral reserves identified in the County, it is extremely challenging to identify edge of settlement locations that do not correspond with either Category 1 or Category 2 reserves. In this respect, allocations have been made within Mineral Safeguarding Areas. However, in doing so the following factors have been balanced: the overriding need for the development meet housing and employment needs, edge of settlement location, within 200m of sensitive development or the site has an extant planning permission or forms part of an existing Adopted LDP allocation.
<b>LPA Recommendation</b>	No change required.
<b>National Grid Capacity</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Grid capacity will restrict renewable energy developments [Manor Farm Partnership, [Private Individual x2].</li> </ul>
<b>LPA Response</b>	Comments noted. We recognise the grid capacity challenges and have liaised with National Grid in preparing the Plan and alongside site promoters consulting National Grid directly with regards to site specific requirements.
<b>LPA Recommendation</b>	Continue to liaise with National Grid.



<b>Net Zero Carbon Ready</b>	<ul style="list-style-type: none"> <li>Should be built to the highest environmental standards and not the minimum standards to achieve 'net carbon ready' [Private Individual x1].</li> </ul>
<b>LPA Response</b>	In October 2023 a report of post consultation Preferred Strategy changes agreed to enhance the sustainability credentials and energy efficiency of the homes that are to be constructed to be net zero carbon homes rather than net zero ready homes. Further details are set out in Policy NZ1 – Monmouthshire Net Zero Carbon Homes and the associated supporting evidence.
<b>LPA Recommendation</b>	As agreed by Council in October 2023, incorporate a policy requirement for new homes to be net zero carbon homes.
<b>Collaborative working</b>	<ul style="list-style-type: none"> <li>Welcome collaboration that considers the cumulative impact of development [Torfaen Council].</li> </ul>
<b>LPA Response</b>	Comments welcomed.
<b>LPA Recommendation</b>	Continue to work collaboratively with Torfaen County Council.
<b>General /other</b>	<ul style="list-style-type: none"> <li>Land at St Lawrence Lane should be included within the RLDP as a strategic site allocation [Vistry].</li> <li>South west of Llanfoist is 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].</li> <li>Strongly consider that the RLDP should include sites that cater specifically for the older population [Grove Farm Estates].</li> <li>Notwithstanding Strategic allocation it is contended that the employment land provision would appear secondary to these allocations and might likely be incapable of making significant contribution to the target of 6240 additional jobs in Monmouthshire [Private Individual x1].</li> <li>Usk is not on this register [Private Individual x1].</li> <li>Magor/Undy has constant development. New settlement at St Brides absurd [Private Individual x1].</li> <li>Comments in relation to Land west of Rockfield Road being filtered out at this stage [Hallam Land Management Ltd].</li> </ul>
<b>LPA Response</b>	<p>Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.</p> <p>The Deposit Plan provides the policy framework to allow for the consideration of specialist housing to come forward throughout the Plan period (Policy H7 – Specialist Housing), which includes the housing requirements of older people.</p> <p>The level of employment land (B Use Class) allocated is based on the findings of the Employment Land Review which recommended that a minimum of 38ha of B Use Class employment land is identified in the Deposit Plan, based on past take up rates rather than the projected job figure.</p> <p>The Preferred Strategy only identified Preferred Strategic Site Allocations. Allocations in the lower tier settlements such as Usk were not included at that stage. The Deposit Plan includes details of the site-specific allocations at all levels of the settlement hierarchy, with policy HA11 – Land East of Burrium Gate allocated in Usk.</p> <p>There are no new allocations identified for the Magor/Undy area, however, the developments at Vinegar Hill and Rockfield Farm, Undy to contribute to the existing commitments element of the housing supply.</p> <p>The RLDP does not propose a new settlement at St Brides as paragraph 3.53 of PPW12 states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.”</p>

<b>LPA Recommendation</b>	No change required.
<b>Question 10 – Do you have any comments on Strategic Policy S7 Preferred Strategic Site Allocation: a) Abergavenny East?</b>	
<p>34 organisations or members of the public submitted a response to question 10 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.</p>	
<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Supportive Comments</b>	<ul style="list-style-type: none"> <li>• Accept site has potential to provide a mixed development subject to guarantees that the considerable infrastructure challenges are fully costed and delivered and site is integrated with the rest of the town. [Abergavenny Town Council, SOUL, Abergavenny &amp; District Civic Society]</li> <li>• 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]</li> <li>• Site can play a significant role in contributing to affordable housing targets, particularly given the site promoter is MHA. [MHA]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>Support for the Abergavenny East Strategic Site Allocation welcomed. The allocation offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally.</p> <p>To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East.</p>
<b>LPA Recommendation</b>	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.
<b>Objection Comments</b>	<ul style="list-style-type: none"> <li>• No certainty that the site will be able to deliver the quantum of homes that the RDLDP 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 &amp; DW, Hallam Land Management Ltd, Taylor Wimpey, Edenstone Homes, Edenstone Group, Bellway Homes, Tompkins Thomas Planning, Candleston Homes, Edenstone]</li> <li>• Delayed delivery of Abergavenny East would impact on the delivery of affordable homes. [Hallam Land Management Ltd]</li> <li>• 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]</li> <li>• Alternative Abergavenny strategic site options perform better in the ISA than Abergavenny East. [Hallam Land Management Ltd]</li> </ul>

	<ul style="list-style-type: none"> <li>Site has not been correctly assessed from a landscape perspective. Site would impact on the landscape setting. [Tompkins Thomas Planning, Private Individuals x 3]</li> </ul>
<b>LPA Response</b>	<p>The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally.</p> <p>The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail, details of which will be set out in a Statement of Common Ground between the Council and relevant parties.</p> <p>To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p> <p>Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period.</p> <p>Landscape assessments have informed the site allocation process.</p>
<b>LPA Recommendation</b>	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>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]</li> <li>Site would impact on highway capacity and flood risk. [Private Individuals x 2]</li> </ul>
<b>LPA Response</b>	<p>The site promoters are aware of the need to undertake a Hydraulic Modelling Assessment as part of the planning application process.</p> <p>The site is not within a flood risk area as identified by Welsh Government's Development Advice Maps or the Flood Map for Planning.</p> <p>A Strategic Transport Assessment has been undertaken to inform the RLDP, and site specific Transport Assessments will be required to identify localised issues and set out specific mitigation and highway improvements.</p>
<b>LPA Recommendation</b>	Continue to liaise with the site promoters and infrastructure providers.
<b>Foot bridge/A465 crossing</b>	<ul style="list-style-type: none"> <li>Firm commitment to the early provision of a suitable active travel crossing of the A465 is required to ensure support for the proposal. [Abergavenny &amp; District Civic Society, Abergavenny Transition Town]</li> <li>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]</li> </ul>

	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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 &amp; 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]</li> </ul>
<b>LPA Response</b>	<p>The allocation on Land to the East of Abergavenny offers a significant opportunity for the future growth of Abergavenny through the provision of approximately 500 net zero carbon homes, 50% of which will be affordable, open space and community and commercial development. It also offers a significant opportunity for a park and ride facility to provide much needed parking provision for Abergavenny Railway Station as well as potential to open up opportunities to enhance the area around the railway station more generally.</p> <p>The integration of the site with the existing settlement is a key principle of the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus of the site. A multi-agency approach has been taken to addressing this issue with in-principle support given from the key stakeholders including Welsh Government Highways Department, Transport for Wales and Network Rail details of which will be set out in a Statement of Common Ground between the Council and relevant parties.</p> <p>To ensure the site delivers on the key priorities of the RLDP, site specific policy requirements are set out in Policy HA1 – Land East of Abergavenny East. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p>
<b>LPA Recommendation</b>	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny. Continue to liaise with the relevant agencies to progress the connection links across the A465 and the railway line.
<b>Masterplanning/ Assessments</b>	<ul style="list-style-type: none"> <li>• 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 &amp; District Civic Society, SOUL, Tompkins Thomas Planning, Private Individuals x 2]</li> <li>• NRW set out detailed assessments and factors that may need to be considered as part of the allocation including landscape, biodiversity, and drainage. [NRW]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>Land to the East of Abergavenny offers an excellent opportunity to create a sustainable, vibrant mixed-use neighbourhood destination. A masterplan, establishing a design code and land use parameters is key to the progression of the site. In this respect, input from the Design Commission for Wales has helped shaped the site's progression to date and we will continue to liaise with DCfW as the site progresses through the development plan process and planning application process. A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application.</p> <p>As noted by Monmouthshire Housing Association (the site promoters) significant site evidence assessments have been undertaken and are ongoing as dialogue continues with the relevant agencies as part of the development plan preparation process.</p>
<b>LPA Recommendation</b>	Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny. Continue to liaise with the relevant agencies to progress the masterplanning and evidence base for the site.
<b>Sites promoted in response to question 20</b>	<ul style="list-style-type: none"> <li>• Edenstone Homes – consider CS0094 Penlanlas Farm would be more appropriate [Edenstone].</li> <li>• Bellway Homes – CS0250 – Evesham Nurseries – [Bellway]</li> <li>• Tompkins Thomas Planning – CS00056 – South of Brecon Road [Tompkins Thomas Planning]</li> </ul>

<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
<b>LPA Recommendation</b>	See the Candidate Sites Assessment Report for candidate site recommendations.

### **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 are needed in relation to improvements of services, such as GP, schools and community services, as well as improvements to highway infrastructure. Many responses indicated that Chepstow already experiences problems with congestion and traffic, particularly at Highbeech Roundabout and there is also the concern and consideration of cumulative impact with proposed development of circa 1,000 homes at Severnside (CS0087& CS0251), as well as proposed new development in bordering English counties, such as 2,460 homes 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, there was an overarching concern in relation to impact the proposal would have upon the setting of the adjacent Wye Valley National Landscape (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 the 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 the placemaking and master-planning process to be undertaken prior to allocation. However, comments have challenged whether this will be viable, and 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:

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Housing delivery</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.

	In terms of delivering the affordable housing, the sites have been through viability assessments prior to the allocation process. A statement of common ground and Site Placemaking Policy HA3 will also tie the developers of the Chepstow site to delivering the 50% affordable housing requirement. Similarly, infrastructure requirements have been considered as part of demonstrating viability for proposed allocations and the Infrastructure Delivery Plan (IDP) will set out how this Infrastructure will be delivered.
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounon Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounon Road Chepstow.</p> <p>Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounon Road.</p>
<b>Housing growth</b>	<ul style="list-style-type: none"> <li>• Growth is justified in the town in order to address current shortfall [ Barwood].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The level of growth set out in the Preferred Strategy (2022) was informed by a wide range of evidence and responded to a number of challenges that had arisen throughout the plan making process. It is considered that the level of growth proposed in Chepstow is sustainable and proportionate to address local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales. In the Preferred Strategy (2022) consultation Welsh Government did not object to our level of growth in that it reflects the urgent need to increase the supply of affordable housing in Monmouthshire. Welsh Government agreed the Strategy’s conformity with Future Wales.</p> <p>In October 2023, a number of post-consultation updates to the Preferred Strategy (2022) were endorsed by Council forming the basis for the level of growth set out in the Deposit Plan. These included allowing for growth in Monmouth which was previously avoided due to no phosphates solution being identified for the River Wye Catchment area and an increase in the flexibility rate from 10% to 15%. This has resulted in the housing provision figure increasing from 5,940 homes (10% flexibility) to 6,210 homes (15% flexibility). In relation to housing growth in Chepstow it was also agreed to amend the site from Bayfield to Mounon Road on the basis that a mixed-use development that had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p>
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounon Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounon Road Chepstow.

<b>Commitments</b>	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].
<b>LPA Response</b>	Comments noted. This was one of the considerations in relation to allocations and part of the reason why Chepstow has a smaller % of new allocation growth compared to the other Primary Settlements of Abergavenny, Monmouth and Caldicot. See the Housing Background Paper for further explanation.
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
<b>Place-making</b>	<ul style="list-style-type: none"> <li>• Well integrated with the existing community and has strong placemaking credentials to contribute towards the vibrancy of Chepstow. It will deliver:</li> <li>• 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].</li> <li>• 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:</li> <li>• 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.</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p> <p>GI, landscape and Nature Recovery considerations have played an important part in site selection and design with landscape assessments and GI assessments as part of the Candidate Site assessment process. GI assets and opportunities plans are required as part of the ongoing site allocation masterplans. Furthermore, the Deposit Plan includes Policy S5 – Green Infrastructure which requires development proposals to maintain, protect and enhance these resources, as well as other detailed Development Management policies for protecting Monmouthshire’s natural environment and the site specific placemaking policy HA3 relating to the Chepstow allocation. Statements of Common Ground will be agreed with developers to ensure these promises to deliver GI and nature recovery requirements are delivered.</p>
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.

<b>Highway safety /Active Travel</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• There isn't a footpath or cycle path that safely connects this area with key amenities and transport [Private Individual x1].</li> <li>• High speed vehicles along the B4235 Usk Road would significantly reduce safety at the entrance to the site [Private Individual x1], [Cllr Christopher Edwards].</li> <li>• If Bayfield is developed further there will need to be traffic control measures at the High Beech Roundabout [Private Individual x1].</li> <li>• 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].</li> <li>• Only one access road off the development which will further exacerbate the difficulties of the site [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p> <p>The integration of an edge of settlement site with Chepstow's existing settlement is a key principle of the site's development and identifying connection links that provide safe pedestrian crossings and footpaths across the A466 is a key focus of the site. The site will be masterplanned in accordance with Sustainable Transport Policy S13 and Development Management policy ST1. There will also be a site specific placemaking policy HA3 for our Chepstow allocation which will set out expectations for Active Travel and the Transport Assessment for the site. The Infrastructure Delivery Plan sets out further detail on how the required highway infrastructure is to be delivered.</p> <p>It is acknowledged that Chepstow is hilly, however the site search sequence identifies the most sustainable sites in terms of walking distances to key services.</p>
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p>
<b>Public water supply and sewerage network / treatment works</b>	<ul style="list-style-type: none"> <li>• There are no issues 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].</li> <li>• Chepstow does not have a wastewater treatment works, but that combined sewer overflows discharge to the River Wye [NRW].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. Further detail on water supply /sewerage arrangements for the site will be set out in the Infrastructure Delivery Plan (IDP).</p>
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p>
<b>'Net Zero Carbon Ready Homes'</b>	<ul style="list-style-type: none"> <li>• Request that further guidance is issued to assist developers in this regard [BDW].</li> <li>• 'Net Zero Carbon Ready Homes' should be properly defined to reduce uncertainty for developers and to ensure delivery [BDW].</li> <li>• No reason why home can't be built with top rate insulation to passive house standards [Private Individual x1].</li> </ul>



<b>LPA Response</b>	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included a change to the policy requirement for the environmental credentials of the new homes to be 'net zero carbon' rather than 'net zero carbon ready'. This would result in the new homes achieving a balance between the carbon emitted into the atmosphere, and the carbon removed from it. The objective is to ensure that the new homes constructed within Monmouthshire do not increase carbon emissions in the long term. The Deposit Plan includes policy NZ1 which sets out the definition and standards for 'Net Zero Carbon Homes'
<b>LPA Recommendation</b>	Refer to Policy NZ1 – Monmouthshire Net Zero Carbon Homes for further details.
<b>50% affordable homes</b>	<ul style="list-style-type: none"> <li>• Challenging due to development viability and delivery concerns and should be thoroughly evaluated. Social Housing Grant is very uncertain at this stage [BDW].</li> <li>• Positive proposals in the application in particular addressing the need for affordable housing and rentals [Private Individual x1].</li> <li>• 50% affordable housing will help attract younger families, if only a little, to Chepstow [Private Individual x1].</li> <li>• Concern affordable housing won't be delivered – Mabey Bridge only 22 houses affordable [Private Individual x1].</li> <li>• Most houses will not be what I would consider truly affordable [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Viability assessments have demonstrated that the proposed site allocations are viable based on the provision of 50% affordable housing. The level of growth proposed in Chepstow is sustainable and proportionate to address local issues and objectives including the delivery of affordable homes and rebalancing our demography.
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
<b>Infrastructure (Services)</b>	<ul style="list-style-type: none"> <li>• Development of any site in Chepstow would cause detriment to town without significant investment in supporting infrastructure [Cllr Christopher Edwards, [Private Individual x7]</li> <li>• Examples of families who have moved to Chepstow who cannot find a dentist [Private Individual x2].</li> <li>• 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].</li> <li>• Chepstow has lack of funding for improvement to Schools/leisure/community facilities/ wellbeing &amp; cultural activities [Private Individual x5].</li> <li>• 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].</li> <li>• Public transport services in Chepstow are not fit for purpose. Lack frequency to key commuter destinations [Private Individual x1].</li> <li>• Requires a realistic public transport action plan [Private Individual x1].</li> <li>• If Bayfield is built Chepstow will require at least one more primary school [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.

	An Infrastructure Delivery Plan (IDP) has been prepared to assess the key issues and constraints and what the infrastructure requirements for each of the residential allocations within the RLDP. Site placemaking masterplanning policies have also been set out within the Plan to set out clearly the key placemaking requirements for each site. See Policies S8 and HA3 for Land at Mounton Road Chepstow.
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p> <p>Refer to the Infrastructure Delivery Plan –for further details on the infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.</p>
<b>Infrastructure (Highways)</b>	<ul style="list-style-type: none"> <li>• Transport Infrastructure improvements required before housing is built [ Cllr Christopher Edwards, Private Individual x9].</li> <li>• Current transport infrastructure cannot cope with current demands and there is significant traffic in Chepstow [Cllr Christopher Edwards, Private Individual x12].</li> <li>• Highbeech roundabout already under severe congestion and pressure with traffic [Private Individual x4].</li> <li>• Congestion at M48 Severn Bridge and Newhouse Roundabout [Private Individual x1].</li> <li>• Road conditions are appalling. We cannot look after the roads we have now [Private Individual x1].</li> <li>• One accident or roadworks and the whole town goes into gridlock [Private Individual x1].</li> <li>• 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].</li> <li>• There does not appear to be any hope for a Chepstow bypass [Private Individual x1].</li> <li>• A bypass for traffic between Beechly and the M48 is needed urgently to address the well documented traffic and pollution problem [Private Individual x4].</li> <li>• Increase of traffic also from the Forest of Dean [Private Individual x1.]</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Site Assessment for further information.</p> <p>A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the proposed housing growth will have on Monmouthshire’s transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the ‘Sustainable Transport Hierarchy’. This is also set out in Policies S13 and ST1 ‘Sustainable Transport Proposals’ and Place-making Policies S8 and HA3.</p>
<b>LPA Recommendation</b>	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.

<b>Cumulative impact</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	<p>An Infrastructure Delivery Plan (IDP) has been prepared to assess the key issues and constraints and what the infrastructure requirements for each of the residential allocations within the RLDP.</p> <p>The cumulative impacts of site allocations are considered as part of the Integrated Sustainability Assessment (ISA) and the Habitats Regulations Assessment (HRA).</p>
<b>LPA Recommendation</b>	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocations in the south of the county. See also the IDP and HRA which looks at the cumulative impact of the proposed development
<b>Air Quality/ Pollution</b>	<ul style="list-style-type: none"> <li>With the additional traffic comes increased vehicle emissions and pollution [Hallam Land Management Ltd, Cllr Christopher Edwards, Private Individual x10].</li> <li>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].</li> <li>No solution or even progress towards a solution is being advanced by either the Welsh Government or the Council [Cllr Christopher Edwards, Private Individual x2].</li> </ul>
<b>LPA Response</b>	<p>Although it is acknowledged there is a localised problem within Chepstow with regard to air pollution and there is an existing AQMA within Chepstow, latest evidence is indicating that air quality is improving within the area. The latest Air Quality Management Progress Report 2023 on the Council's website indicates that there have been improvements to air quality in the area since 2017. The Council also has an Air Quality Action Plan which is continuously reviewed. Additional impact, including cumulative of proposed development will be appropriately assessed with localised air quality assessments and reviewed by MCC Environmental Health Officers.</p> <p>The impact of development upon air quality is also set out placemaking Policies S8 and site specific HA3 – Land at Mounton Road Chepstow. The cumulative impacts of site allocations upon air quality are also considered as part of the Integrated Sustainability Assessment (ISA) and the Habitats Regulations Assessment (HRA).</p>
<b>LPA Recommendation</b>	Refer to ISA and HRA and Policies S8 and HA3. Continue to liaise with MCC Environmental Health Officers.
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP. While the County's main towns are situated outside of Future Wales' indicative green belt, in assessing candidate sites and their relationship to Policy 34 of Future Wales, consideration has been given to PPW12 which states that when

	<p>considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South East Wales Region.</p>
<b>LPA Recommendation</b>	<p>A strategic site is to be identified in Chepstow. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p>
<b>Agricultural land</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023 with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government.</p> <p>Brownfield opportunities have been considered through the site selection and candidate site process however, given the limited brownfield opportunities in a Monmouthshire context, greenfield opportunities, including BMV land, have had to be considered to meet the housing and employment requirements. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy: all four of our primary settlements including Chepstow, are surrounded by BMV agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy. The site allocation process has gone through a ‘Site Search Sequence’ which has sequentially assessed sites in relation to the proportion of BMV land.</p>
<b>LPA Recommendation</b>	<p>No changes to the level of growth and spatial strategy area required (a housing providing figure of 6,210 homes was agreed in the October 2023 Council decision).</p>
<b>Landscape /AONB</b>	<ul style="list-style-type: none"> <li>• Within close proximity to Wye Valley National Landscape (AONB). A Landscape Sensitivity Assessment (LSA) would help inform your Authority’s decision on whether to progress this site. If progressed please consider informing the decision with Landscape Visual Impact Assessments (LVIAs) [NRW].</li> <li>• Site has the potential to significantly impact the surrounding landscape and heritage where part of the site falls within the Wye Valley National Landscape (AONB) [Hallam Land Management Ltd, [Taylor Wimpey, Edenstone Homes, [ Bellway Homes, [ Cllr Christopher Edwards, Private Individual x10].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• The reappraisal of the LSA was done by the developer promoting the site to serve its own ends [Cllr Christopher Edwards, Private Individual x1].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• More development close to the AONB boundary will have a detrimental impact on dark night skies within the AONB [Private Individual x1].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p> <p>All site proposals will be required to accord with landscape Policies within the RLDP, LC1-LC5 to ensure development would not have an unacceptable adverse effect on the special quality of Monmouthshire’s landscape.</p>
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p> <p>All site proposals will be required to accord with landscape Policies within the RLDP, LC1-LC5 to ensure development would not have an unacceptable adverse effect on the special quality of Monmouthshire’s landscape</p>
<b>Heritage</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.</p>

<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow.
<b>Ecology</b>	<ul style="list-style-type: none"> <li>• Development on greenfield sites will damage the habitat of birds, bats, badgers, butterflies [Private Individual x5].</li> <li>• 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].</li> <li>• A significant buffer of at least 15m to the adjacent woodland will be needed and a sensitive lighting scheme necessary [NRW].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See and Candidate Sites Assessment Report for further information.</p> <p>All site proposals will be required to meet GI, landscape and Nature Recovery considerations. National Policy PPW chapter 6 as well as our Policies within the RLDP, S5, GI1, LC1-LC5, NR1-NR3 ensure all biodiversity is maintained and enhanced and ecosystem resilience will be improved as a result of proposed development.</p>
<b>LPA Recommendation</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.</p> <p>All site proposals will be required to meet GI, landscape and Nature Recovery considerations. National Policy PPW chapter 6 as well as our Policies within the RLDP, S5, GI1, LC1-LC5, NR1-NR3 ensure all biodiversity is maintained and enhanced and ecosystem resilience will be improved as a result of proposed development.</p>
<b>Self – containment /commuting</b>	<ul style="list-style-type: none"> <li>• Chepstow has a poor level of self- containment [Melin Homes, [ Llanarth Estates, [ Tirion Homes, Candleston Homes, Sero Homes, Sero, Private Individual x1].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. Supporting a mixed use site in Chepstow could reduce the need to travel to work as gives the opportunity to work and live together and gives the opportunity to increase the level of self containment within Chepstow.</p> <p>Proposed development will be required to accord with the Sustainable Transport Hierarchy as set out in National Policy and the RLDP Policy S13 and ST1 which requires new development to reduce the need to travel and promote active travel and public transport connections above the private car.</p>
<b>LPA Recommendation</b>	In accordance with the October 2023 Council decision, a mixed use residential and employment allocation with opportunities for self containment and reduced commuting is to be allocated at Land at Mounton Road, Chepstow.

<b>Forest of Dean (FOD) /South Gloucester</b>	<ul style="list-style-type: none"> <li>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].</li> <li>Over 5000 new houses have already been approved to built in nearby towns and villages e.g. Lydney, Sedbury, Beachley, Tutshill [Private Individual x1].</li> <li>Demand from nearby settlements in England ignored in the Council's assessment of the capacity for Chepstow to grow [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Comments noted, the Council are working collaboratively with the Forest of Dean and South Gloucestershire on issues affecting Chepstow in relation to the A48.</p> <p>A Strategic Transport Assessment (STA) has been undertaken by TfW in order to understand the cumulative impact the propose housing growth will have on Monmouthshire's transport network. The STA concludes a slight increase in traffic flows with the proposed Chepstow/ Severnside developments. Transport Assessments will be required to identify localised issues, set out specific mitigation and highway improvements to ensure traffic safety and capacity on the roads and that proposed development accords with the 'Sustainable Transport Hierarchy'. This is also set out in Policies S13 and ST1 'Sustainable Transport Proposals' and Place-making Policies S8 and HA3.</p> <p>An infrastructure Delivery Plan (IDP) has also been prepared which sets out the highway infrastructure requirements for the proposed site in Chepstow.</p>
<b>LPA Recommendation</b>	<p>Continue to liaise with Forest of Dean Council, South Gloucestershire Council and other neighbouring authorities in England on issues that affect the Chepstow area in particular.</p>
<b>Public consultation</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	<p>Prior to formal public consultation of the Preferred Strategy 2022 several public consultation events had taken place in relation the RLDP 2018-2033. This included non statutory growth and spatial options public consultation 8<sup>th</sup> July 2019- 5<sup>th</sup> August 2019 and 4<sup>th</sup> January 2021- 1<sup>ST</sup> February 2021. Statutory public consultation for the Preferred Strategy 2021 (which included an event in Chepstow Drill Hall) and the current Preferred Strategy 2022 December 2022- January 2023 (in person event in Chepstow Board School). The feedback from the growth and spatial options consultations helped to form the decisions and strategic site selection for the 2022 Preferred Strategy Consultation.</p> <p>As such, as a result of the feedback from the Preferred Strategy 2022 consultation, the Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use had associated job creation and tourism benefits.</p> <p>For further information on the Plan's consultation process see our Delivery Agreement and in particular section 3 Community Involvement Scheme which sets out how the Council has proactively involved the community and stakeholders in the preparation on the RLDP.</p>
<b>LPA Recommendation</b>	<p>Continue to carry out necessary public consultations as set out in the Delivery Agreement and Community Involvement Scheme.</p>
<b>Mounton Road (CS0165)</b>	<ul style="list-style-type: none"> <li>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].</li> <li>CS0165 does not impact on the Wye Valley National Landscape (AONB) in the way that CS0098 does [Cllr Christopher Edwards, Private Individual x1].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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)].</li> <li>• 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].</li> <li>• Based on the ISA Option E is the most suitable, viable and sustainable location for the town’s strategic allocation [ Barwood].</li> </ul>
<b>LPA Response</b>	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development had associated job creation and tourism benefits. See Candidate Site Assessment Report for further information.
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
<b>Planning History</b>	<ul style="list-style-type: none"> <li>• Given the history of site CS0098 with previous refusals for development on account of the detriment caused to the Wye Valley National Landscape (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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use proposal had associated job creation and tourism benefits. See Candidate Sites Assessment Report for further information.
<b>LPA Recommendation</b>	The Bayfield Site has not progressed to the Deposit Plan. In accordance with the October 2023 Council decision, a mixed use residential and employment allocation of approximately 146 homes is to be allocated at Land at Mounton Road, Chepstow. Site specific policy requirements are set out in Policy HA3 – Land at Mounton Road Chepstow.
<b>Insufficient Information</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Expected more information showing results of transport assessment with due diligence to active travel and air quality [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The Infrastructure Delivery Plan (IDP) will set out the level of Infrastructure required for the proposed allocation in Chepstow and how this will be delivered. Policies S8 and HA3 – Land at Mounton Road – also sets out key master planning parameters for the proposed site allocation in Chestow. Prior to progressing with a planning application a Transport Assessment and air quality assessment will be required.



<b>LPA Recommendation</b>	Refer to the Infrastructure Delivery Plan –for further details on the Infrastructure requirements as a result of the proposed allocation at Land at Mounton Road. Policies S8 and HA3 also sets out key master planning parameters.
<b>General/ Other</b>	<ul style="list-style-type: none"> <li>• Flooding impact [Private Individual x1].</li> <li>• 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].</li> <li>• 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 subsidised council tax payment [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>High level Candidate Site Assessment sifted out sites on flood plains. Furthermore National Flooding policies (TAN15) and policies within the RLDP will ensure there is no flood risk to development.</p> <p>Usk has a proposed housing allocation. See site allocation Policy HA11 of the Deposit RLDP.</p> <p>Affordable housing in Monmouthshire will only be allocated to people with a local connection to Monmouthshire. It should be noted that this is a policy approach outside of the remit of the RLDP which sits with Monmouthshire County Council’s Housing team. It is beyond scope of RLDP to control market homes occupation, however the Plan does contain Policy H8 – Housing Mix to ensure that development proposals contain a range and mix of house types, tenure and size.</p>
<b>LPA Recommendation</b>	

## 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
<b>Support policy/site</b>	<ul style="list-style-type: none"> <li>• Strongly support the allocation of Caldicot East and the contribution it can make to the RLDP. Provided 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].</li> </ul>
<b>LPA Response</b>	Support noted.
<b>LPA Recommendation</b>	No change required.
<b>Object to policy/site</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Bellway Homes].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• A number of private individuals object to the 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<p><b>LPA Response</b></p>	<p>Comments noted. At the time of the Preferred Strategy consultation Land to the east of Caldicot site (previously known as Caldicot East) was proposed for 925 homes within the plan period. This has been reduced in the Deposit Plan to approximately 770 homes.</p> <p>Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community serving both the new development and nearby homes in both Caldicot and Portskewett.</p> <p>Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p> <p>The consideration of any designations (including ecological and heritage designations) and other constraints have been considered through the masterplanning process to date and referred to in the site allocation policy wording and supporting text.</p>
<p><b>LPA Recommendation</b></p>	<p>No change required.</p>
<p><b>Number of dwellings proposed/deliverability</b></p>	<ul style="list-style-type: none"> <li>• No certainty the site will be able to deliver the quantum of homes over the plan period as neither site has developer interest [Barratt &amp; David Wilson Homes].</li> <li>• 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 [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes &amp; Bellway Homes].</li> <li>• Consider the Preferred Strategy is overly reliant on this strategic site presenting significant risk to the delivery of housing over the plan period [Vistry].</li> <li>• 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].</li> </ul>

	<ul style="list-style-type: none"> <li>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 &amp; Edenstone].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. At the time of the Preferred Strategy consultation the Land to the east of Caldicot site was proposed for 925 homes within the plan period. This has been reduced in the Deposit Plan to approximately 770 homes.</p> <p>Anticipated delivery rates have been set out in the Housing Trajectory contained in Appendix 9 of the Deposit Plan. This demonstrates that the site can be delivered within the Plan period.</p>
<b>LPA Recommendation</b>	No change required.
<b>Strategic Infrastructure</b>	<ul style="list-style-type: none"> <li>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].</li> <li>Significant infrastructure costs associated with bringing this site forward which could impact on delivery rates and timescales [Barratt &amp; David Wilson Homes].</li> <li>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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. Infrastructure requirements are set out within the site allocation policy. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p>
<b>LPA Recommendation</b>	No change required.
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>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 &amp; Private individuals x 2].</li> </ul>
<b>LPA Response</b>	<p>The boundary of the Green Belt will be informed by the SDP. The indicative Green Belt (as set out in Future Wales), is located to the north of the M48 which is outside the boundary of Land to the east of Caldicot.</p>
<b>LPA Recommendation</b>	No change required.
<b>Proximity to M4</b>	<ul style="list-style-type: none"> <li>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 it 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 &amp; Private individuals x 2].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. Land to the east of Caldicot provides the opportunity for a new neighbourhood of Caldicot with links to Portskewett to the east. The site is allocated as a residential-led mixed-use development delivering net zero carbon homes, of which 50% will be affordable, along with a primary school, a local centre, public open space, community facilities and B1 employment uses. The primary school will bring benefits for the wider community</p>

	<p>serving both the new development and nearby homes in both Caldicot and Portskewett. While there is no control over where the purchasers of market homes currently live, the affordable housing on the site will only be allocated to people with a local connection to Monmouthshire (note that this is a policy approach outside of the remit of the RLDP which sits with the Monmouthshire Housing team). A housing mix policy is also included in the plan to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. This policy applies to all residential sites including the allocated housing sites.</p>
<b>LPA Recommendation</b>	No change required.
<b>20-minute neighbourhood</b>	<ul style="list-style-type: none"> <li>Suggest majority of site is located outside the 20-minute neighbourhood [Hallam Land Management Ltd., Taylor Wimpey, Edenstone Homes &amp; Bellway Homes].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. It is recognised that the northernmost part of the site will be located further than a 20-minute walking distance to Caldicot Town Centre and other community facilities including the Secondary School. The site will, however, provide a number of facilities on-site including a primary school, local centre, public open space, appropriate community facilities and B1 employment. The policy also includes reference to the provision of a public transport link throughout the site to enable connections to Caldicot Town Centre and beyond.</p>
<b>LPA Recommendation</b>	No change required.
<b>Masterplanning/ Assessments</b>	<ul style="list-style-type: none"> <li>Provide detail on proximity to designations that need to be considered as part of the development. Recommendation that opportunities in relation to design, ecology, drainage and natural resources are also provided to inform masterplanning of the site [Natural Resources Wales].</li> </ul>
<b>LPA Response</b>	<p>Comment noted. The site allocation policy wording and supporting text provide reference to nature conservation designations including the Nedern Brook wetlands SSSI and Severn Estuary European Marine Site. The policy wording ensures any impact is recognised and that careful design is required to avoid increased disturbance to qualifying features. Masterplanning has considered these designations to date and will continue to as it evolves further through to the planning application stage. An Infrastructure Delivery Plan has been produced with site specific considerations relating to Land east of Caldicot which is an appendix to the Deposit Plan.</p>
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	<p>Comment noted. Assets proposed for disposal are not publicly listed and require Council consent prior to disposal, at which time assets are advertised on the open market. The Council has given support for this site to progress as an allocation through endorsement of the Preferred Strategy, as such this shows commitment for the site to be disposed of and brought forward within the plan period. Refer to the housing trajectory which sets out anticipated timescales for the development of the site.</p>
<b>LPA Recommendation</b>	No change required.

### 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 in 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
<b>G&amp;T need should be addressed in the RLDP.</b>	<ul style="list-style-type: none"> <li>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]</li> <li>Needs of Gypsy and Traveller community should be catered for in the Plan. [Private Individual]</li> </ul>
<b>LPA Response</b>	An updated GTAA has been prepared and was agreed by Welsh Government in June 2024. A site allocation to address outstanding Gypsy and Traveller need to 2033 is made under Policy S9 – Gypsy and Travellers (formally S8 in the Preferred Strategy).
<b>LPA Recommendation</b>	Update Strategic Policy S8 (now S9 in the Deposit Plan) to include a site-specific allocation to meet the outstanding GTAA need.
<b>Sites should consider planning considerations</b>	<ul style="list-style-type: none"> <li>Land should not be made available without the usual GI, public open space and amenity land protections, highway, and planning considerations. [Cllr Louise Brown]</li> </ul>
<b>LPA Response</b>	Comments noted. In addition to Planning Policy Wales, the RLDP Gypsy and Traveller Allocation and any proposals that come forward during the Plan period will also be considered against Welsh Government Guidance: Designing Gypsy, Traveller and Travelling Showpeople Sites.
<b>LPA Recommendation</b>	No change required.
<b>Object to G&amp;T provision</b>	<ul style="list-style-type: none"> <li>Object to policy and allocating Gypsy and Traveller site(s). [Private Individuals x 3]</li> </ul>
<b>LPA Response</b>	Planning Policy Wales requires Local Authorities to allocate sites to meet the need identified in the Gypsy Travellers Accommodation Assessment and provide a criteria-based policy for sites that may come forward throughout the life of the Plan.
<b>LPA Recommendation</b>	No change required.

### 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, and that 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
<b>Support Sustainable transport</b>	<ul style="list-style-type: none"> <li>• Support sustainable transport which reduces need to travel by car and places development near public transport links [Abergavenny &amp; Crickhowell Friends of the Earth, Vistry, Edenstone, Private Individual x2].</li> <li>• Support the concept of the ‘20-minute neighbourhood’ [Private Individual x1].</li> <li>• 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].</li> <li>• Respectfully suggest that the phrasing ‘must’ is substituted with ‘should provide appropriate measures subject to site-specific considerations’ [Redrow Homes Limited].</li> <li>• 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 cars. WG policies driven by the need to cut car emissions will no longer be necessary [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Support welcomed.</p> <p>With regards to changing the word from ‘must’ to ‘should,’ the policy requirement for development proposals to ensure the sustainable transport hierarchy reflects national policy set out in PPW12 and Llwybr Newydd Wales Transport Strategy and is, therefore, considered appropriate and necessary. It is however recognised that Monmouthshire is a rural county and the RLDP in other policy areas supports development in rural locations. Strategic policy S13 and supporting development management policy ST1 will therefore recognise that Monmouthshire is a rural county and allows for site -specific considerations in rural locations. Policy ST1 will require Transport Assessments to be submitted and a proportionate approach taken in assessing developments in rural areas in accordance with the Sustainable Transport Hierarchy.</p> <p>In relation to the comment that cars will not produce emissions this is not the purpose of the policy, the purpose of the policy is to influence the way people travel and change behaviours by providing facilities and enabling the use of public transport and active travel and reduce the reliance on the private car. Policy S13 does require necessary infrastructure for Ultra Low Emission Vehicles (ULEVs)</p>
<b>LPA Recommendation</b>	<p>No changes required. Policy reference has changed to S13. Development Management Policy ST1 will also address rural transport issues and take a proportionate approach to assessing rural transport issues.</p>
<b>Transport issues wider than the proposed development</b>	<ul style="list-style-type: none"> <li>• 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 networks have active travel shortcomings [Cllr Christopher Edwards, Private Individual x2].</li> </ul>

<b>LPA Response</b>	Master planning of the proposed allocated sites will explore active travel connections. Strategic Policy S13 Sustainable Transport requires development proposals to maximise active travel opportunities and for developments to link to the Active Travel Network Maps (ATNM).
<b>LPA Recommendation</b>	No change required. The policy reference has been changed to S13.
<b>Active travel</b>	<ul style="list-style-type: none"> <li>• Support the objective, however, how will investment in low carbon transport infrastructure enable more people to walk and cycle [Private Individual x1].</li> <li>• 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].</li> <li>• Policy does not take account of the lack of active travel measures between the whole of the narrow southern band of development [Cllr Louise Brown].</li> <li>• No cycle paths joining up Severnside (many cyclists killed/injured on the B4245) [Private Individual x1]</li> <li>• Active travel networks are concentrated in urban areas and do not cover links between towns and villages [Cllr Louise Brown].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The objective of the Policy is to support and facilitate active travel provision and active travel infrastructure where possible, such as signage and bike parking and charging facilities. We cannot control people's behaviour, but we can try to influence it.</p> <p>Detailed Transport Assessments (TAs) will be required to assess active travel routes and facilities and provide a Travel Plan, which would take into account topography of sites and surrounding areas to ensure practicability of such provision.</p> <p>The Policy makes reference to need for developments to take account of Active Travel Network Maps (ATMNs). These are maps that set out the existing active travel routes within the county and therefore will highlight where links are required for improvements to connectivity between settlements.</p> <p>The proposed strategic sites are all located within active travel localities and the main proportion of the RLDP spatial strategy's growth is located in active travel localities. While it is recognised that some of the proposed allocations in rural areas are not active travel locations, an appropriate amount of growth is identified in such areas in order to sustain our rural communities by providing affordable homes and development opportunities of an appropriate scale.</p> <p>Development proposals in Main Rural Settlements will still be required to connect to public transport facilities and PROW. The RLDP also supports the rural economy and tourism in rural locations</p> <p>This policy supports cycleways, which are also supported in DM Policy ST1 Sustainable Transport Proposals.</p> <p>Development Management Policy ST1 sets out further guidance in relation to the how to address active travel considerations in TAs specific to Monmouthshire. Guidance on Active Travel provision is also set out in National Policy PPW, Active Travel Act Guidance and the WTS.</p>
<b>LPA Recommendation</b>	No significant changes required to the Strategic Policy. The reference of the Policy is now S13.
<b>National Development Framework</b>	<ul style="list-style-type: none"> <li>• Strategic 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].</li> </ul>
<b>LPA Response</b>	Comments noted.

<p><b>LPA Recommendation</b></p>	<p>No change required. The Policy reference has changed to S13.</p>
<p><b>Rural nature of Monmouthshire</b></p>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• Difficult to "retrofit" sustainable transportation patterns [Melin Homes, Llanarth Estates, Tirion Homes, Candlestone Homes, Sero, Private Individual x2]</li> <li>• Should be recognised in rural areas that it is inevitable that there will be reliance on travel by car [Private Individual x2].</li> <li>• 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],</li> <li>• Proportionate growth in smaller settlements 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 discouraging car use [Monmouthshire Housing Association, Llanarth Estates, Private Individual x2].</li> <li>• 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].</li> <li>• Little public transport in Usk [Private Individual x1].</li> <li>• Usk candidate sites will not be within 20-minute walking distance of everyday services [Private Individual x1].</li> <li>• Car is king and the Welsh Government won't change that in their fantasy land [Private Individual x1].</li> <li>• The final bullet point and the accompanying text is unclear. 'Demonstrating how proposed development in rural areas enables solutions to rural transport problems, such as improvement of links to public transport, digital infrastructure, and innovative solutions, such as car sharing schemes.' 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 &amp; District Civic Society].</li> </ul>
<p><b>LPA Response</b></p>	<p>It is recognised that sustainable transport policies are more readily applicable in an urban context, however in accordance with PPW, Future Wales and the WTS there is a need for local authorities to provide a supportive planning policy framework to enable new opportunities for sustainable rural travel and rural travel improvements. The RLDP includes localised sustainable transport policies under Strategic Policy S13 and Development Management Policy ST1 which recognises the challenges of implementing sustainable transport policies in rural locations. The Plan recognises the need for Transport Assessments to be assessed proportionally in rural locations (where the car is likely to be the dominant mode of transport) and balance the need/requirement for development in rural areas, where appropriate, and in accordance with other plan policies (rural enterprise, tourism, affordable housing) to support the rural economy. The strategic sustainable transport policy S13 also requires proposals to demonstrate innovative solutions to rural sustainable transport problems where appropriate to do so, such as car sharing schemes.</p>
<p><b>LPA Recommendation</b></p>	<p>No significant changes required, however, some changes have been made to the wording to allow some flexibility in relation to development in rural locations and recognising Monmouthshire's rural context. Policy reference has changed to S13. Development Management Policy ST1 will also address rural transport issues and take a proportionate approach to assessing rural transport issues.</p>



<b>Cross-boundary impacts</b>	<ul style="list-style-type: none"> <li>• Need to work with neighbouring authorities where there are cross boundary impacts and opportunities associated with development [Gloucestershire County Council].</li> <li>• 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 are close to the borders of Monmouthshire and Gloucestershire. They stand to benefit from joined up working between the relevant authorities [Gloucestershire County Council].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted.</p> <p>The Council has undertaken a Strategic Transport Assessment that has assessed the demand on the transport network and takes into consideration the impact to and from neighbouring regions.</p> <p>The Council will continue to work with our neighbouring local authorities on a range of cross boundary issues, including our respective growth levels, spatial strategies and transport demand and potential solutions</p>
<b>LPA Recommendation</b>	<p>The Council will continue to work with neighbouring local authorities on cross boundary impacts, such as travel.</p>
<b>Parking standards</b>	<ul style="list-style-type: none"> <li>• The policy should address reducing parking levels [Welsh Government].</li> <li>• 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-sharing, 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. Policy has been updated to address reducing parking requirements where deemed appropriate in Monmouthshire. It is recognised, however, that Monmouthshire is a rural county and the car is a key mode of transport in some rural areas. Monmouthshire Parking SPG is due to be reviewed by the Council’s highway team following the adoption of the RLDP. The parking policy will make reference to guidance to be taken from this SPG as well as other relevant national guidance, such as Active Travel Act guidance (ATAG).</p> <p>Parking provision from proposed developments will also be required to be addressed in proposals’ Transport Assessments/statements as set out in Development Management Policy ST1. Development Management Policy ST1 supports reduced parking levels/ car free development in town centres (sustainable locations where the car is less reliant).</p>
<b>LPA Recommendation</b>	<p>Strategic Policy S13 updated to include that cycle parking will be given ‘competitive advantage’ in accordance with Active Travel Act guidance. Included reference to “Appropriate level of car-parking”, which will be based on Monmouthshire’s adopted parking SPG. The Council’s parking SPG to be updated by the Council’s highway team to support the RLDP. Strategic Policy reference has changed to S13.</p>
<b>Public Transport</b>	<ul style="list-style-type: none"> <li>• Public Transport provision is poor in Monmouthshire [Private Individual x2].</li> <li>• Public Transport alternatives are inadequate and doomed for failure under current ‘commercial’ service approach whereby the service providers are driven by profitability [Private Individual x2].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Disparity between public transport provision across the county should be recognised in the Policy wording as well as the supporting text [Richborough Estates].</li> <li>• 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].</li> <li>• Poor bus service in Magor/Undy – one per hour in week [Private Individual x1].</li> <li>• More buses will not solve the problem if traffic congestion results in unreliable delayed journeys [Cllr Louise Brown].</li> <li>• Congestion in and out of Chepstow has a very serious adverse effect on the local and regional bus service [Private Individual x1].</li> <li>• Supports enhancements of Severn Tunnel Junctions and development walkway station at Magor [Private Individual x2].</li> <li>• 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]</li> <li>• 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].</li> <li>• 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].</li> <li>• People will never be persuaded to use public transport until it is cheap, efficient, reliable and accessible to all [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>The objective of the Sustainable Transport Policy is to support and facilitate public transport provision by locating development close to existing public transport facilities and providing links from developments to these facilities and providing a supportive policy framework for public transport infrastructure, such as signage and timetable information, shelters and seating. We cannot control people’s behaviour, but we can try to influence it and provide mechanisms to encourage use of public transport.</p> <p>It is recognised there is scope to improve public bus and train services, however these are controlled/ funded separately by private organisations, such as Network Rail and Welsh Government operated Transport for Wales. The Council has and will continue to work collaboratively with these organisations to facilitate public transport service provision within Monmouthshire.</p> <p>Policy ST1 sets out further guidance in relation to the how to address Public Transport considerations in TAs specific to Monmouthshire. Guidance on active travel provision is also set out in National Policy PPW and the WTS.</p>
<b>LPA Recommendation</b>	No significant changes required to Strategic Policy. Reference has changed to S13.
<b>Home working</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Comments noted and support welcomed.

<b>LPA Recommendation</b>	No changes required. Policy reference has changed to S13.
<b>Local Transport Plan (LTP)</b>	<ul style="list-style-type: none"> <li>The LTP is not yet available to comment [Abergavenny &amp; Crickhowell Friends of the Earth, Usk Civic Society]</li> </ul>
<b>LPA Response</b>	The updated LTP, now known as Local Transport Strategy (LTS) was subject to public consultation November/December 2023 and will be available to view during the RLDP Deposit consultation. The LTS will identify the key transport issues relevant to Monmouthshire and what high level interventions are needed to address these transport issues. The draft version of the LTS has been considered as part of the RLDP policy framework. Development Management Policy ST5 supports and safeguards the schemes identified in the LTS.
<b>LPA Recommendation</b>	No change required.
<b>Electric Vehicle Charging (ULEVs)</b>	<ul style="list-style-type: none"> <li>Support the principle of ULEVs, however, viability of smaller schemes will be an important consideration to the implementation of this policy [Monmouthshire Housing Association, Edenstone, Private Individual x2].</li> </ul>
<b>LPA Response</b>	Support welcomed. Development proposals will be expected to meet the Council's key climate change aspirations and part of this is providing supportive policy framework for ULEV infrastructure for new proposed developments. This approach accords with the Plan's climate change policy (S4).
<b>LPA Recommendation</b>	No changes required. Policy reference has changed to S13.
<b>Grid capacity</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The Council has and continues to engage with National Grid regarding grid capacity. National Grid feasibility studies have been requested to inform the site allocations, to ensure grid capacity is appropriately considered and at an early stage to enable the deliverability of our policy approach including in relation to net zero carbon homes and supporting necessary infrastructure such as vehicle charging.
<b>LPA Recommendation</b>	No changes required. Policy reference has changed to S13.
<b>Minerals &amp; Waste</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy in some way. It is not considered necessary to list all objectives in relation to each policy. Similarly, the Plan should be read as a whole with policies being applied as necessary and not ordered in terms of priority. It is considered Objective 5 is addressed within Policy S16 Sustainable Minerals Management and not required to be repeated within S13.
<b>LPA Recommendation</b>	No changes required. Policy reference has changed to S13.
<b>Strategic Sites</b>	<ul style="list-style-type: none"> <li>Abergavenny East will provide affordable homes in sustainable location serving the communities they are located in [Monmouthshire Housing Association].</li> </ul>

	<ul style="list-style-type: none"> <li>• 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 limited 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].</li> <li>• Mounton Road is the most accessible option for strategic future growth in Chepstow in proximity to the town centre and train station [Barwood].</li> <li>• Transport Infrastructure /additional capacity must be confidently delivered before any major new development [Private Individual x1].</li> <li>• Proposed Severnside development gross overdevelopment without the transport infrastructure to support [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The spatial strategy of the RLDP focuses development in the most sustainable settlements. The proposed strategic sites are sustainably located edge of settlement sites and will be well connected to local services and facilities via sustainable travel options. Further detail on the sustainable travel infrastructure needed to support the delivery of site allocations is set out in the site allocation policies S8 HA1 – HA18 and the supporting Infrastructure Delivery Plan.
<b>LPA Recommendation</b>	No change required. Policy reference has changed to S13.
<b>Highway design</b>	<ul style="list-style-type: none"> <li>• Require raised kerbs at bus stops [Disability Advice Project].</li> </ul>
<b>LPA Response</b>	Comments Noted. Development Management Policy ST1 will require all new highway design to be inclusive to all users.
<b>LPA Recommendation</b>	No change required.
<b>General/Other</b>	<ul style="list-style-type: none"> <li>• Grove Farm Care village - co-locating living, care, medical and social facilities together provides 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 &amp; Development].</li> <li>• There has been no provision to provide greater transport links in the Chepstow Plan [Private Individual x1].]</li> </ul>
<b>LPA Response</b>	Site has not been progressed within the Deposit Plan.
<b>LPA Recommendation</b>	No change required.

### 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
<b>Support policy</b>	<ul style="list-style-type: none"> <li>• Welcome policy [Abergavenny Town Council and Abergavenny &amp; District Civic Society].</li> </ul>

	<ul style="list-style-type: none"> <li>Agree town centres should be put first as a place for people to congregate and visit [Private individual x 1].</li> </ul>
<b>LPA Response</b>	Support welcomed.
<b>LPA Recommendation</b>	No change required.
<b>Area specific comments in relation to town, local and neighbourhood centres</b>	<ul style="list-style-type: none"> <li>Failure to allow for growth in Monmouth will threaten the ongoing vibrancy and vitality of the Town Centre [Redrow Homes].</li> <li>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 &amp; Development].</li> <li>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].</li> <li>Concern Chepstow Town Centre is failing and is in decline [Private individual x 1]</li> <li>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].</li> </ul>
<b>LPA Response</b>	<p>The spatial constraint in the Monmouth area relating to phosphates has been removed since the consultation on the Preferred Strategy and as a consequence has site allocations within the Plan which will provide additional support for the Town Centre of Monmouth.</p> <p>Disagree that Llanfoist should be included within the retail hierarchy as both the Central Shopping and Commercial Area and Primary Shopping Frontages are located within the Town Centre of Abergavenny.</p> <p>Usk has been redesignated as a Minor County Town Centre and as a result has a Central Shopping and Commercial Area designation which provides a level of protection to the area.</p> <p>The detailed policies within the RLDP provide protection to the existing Town Centres in Monmouthshire. It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary and these are supported through the policy framework of the RLDP.</p>
<b>LPA Recommendation</b>	No change required.
<b>Town centre first approach</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The Town Centre first approach is reflected within the Plan's policy framework in accordance with national planning policy.
<b>LPA Recommendation</b>	No change required.
<b>Policy wording and context</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted, the detailed policies within the RLDP provide protection to the existing Town Centres, Local Centres and Neighbourhood Centres in Monmouthshire. It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary and these are supported through the policy framework of the RLDP.

<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>• 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 &amp; District Civic Society].</li> <li>• 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].</li> <li>• 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].</li> <li>• Reference is made to specific properties in Abergavenny requesting a review of uses of vacant properties/sites [SOUL].</li> <li>• State Caldicot should be regenerated as it has an anti-social behaviour problem [Private individual x 1].</li> <li>• Desperate need to review the business rates system at a national level. Will help address vacancies in centres [Private individuals x 3]</li> <li>• Traffic congestion in south-east Monmouthshire is impacting on Chepstow Town Centre [Private individual x 1].</li> <li>• 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&amp;E [Private individual x 1]</li> <li>• 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].</li> <li>• 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].</li> <li>• More needs to be done to entice exciting new businesses to open, not just hair salons, barbers and coffee shops [Private individual x 1].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. The RLDP process allows for consultees to be involved at key stages of the plan preparation process. Infrastructure requirements will be assessed on a site-by-site basis. All of the allocated housing sites must deliver 50% affordable housing, details of the phasing to be agreed through trigger points in S106 agreements. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p> <p>Details of active travel funding streams are outside of the RLDP remit. Contributions towards active travel, walking and cycling routes can, however, be provided as part of developments and will be considered on a site-by-site basis based on evidence in Transport Assessments and Masterplans of proposals. An Infrastructure Delivery Plan has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Site specific considerations are included as an appendix to the Deposit Plan.</p> <p>The Urban Housing Potential study considers vacant sites and is included as part of the evidence base for the RLDP process. Vacant properties is a separate issue that is being considered in other departments of the Council, this is beyond the remit of the RLDP.</p> <p>It is recognised that in some instances regeneration initiatives and environmental improvements may be necessary for the County's Town Centres and these are supported through the policy framework of the RLDP.</p> <p>Business rates are set by national government and are outside of the remit of the RLDP process.</p> <p>Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.</p>

<b>LPA Recommendation</b>	No change required.
<b>Question 16 – Do you have any comments on Strategic Policy S11 Community and Recreation Facilities?</b>	
<p>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.</p> <p>The key themes raised are set out below:</p>	
<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Support policy</b>	<ul style="list-style-type: none"> <li>Support this policy and the emphasis it places on protecting and retaining value facilities. Para 5.57 confirms to include buildings used for cultural purposes we suggest minor addition to include theatres on list of examples [ Theatres Trust].</li> </ul>
<b>LPA Response</b>	Support welcomed and comments noted. It is agreed theatres are important cultural facilities for communities.
<b>LPA Recommendation</b>	No significant changes required, however, minor wording changes have been made, including reference to theatres. The policy reference has changed to S15.
<b>Provision Integral to new proposals</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. New allocations proposed in main rural (Tier 3) settlements reflect their position in the settlement hierarchy as our most sustainable rural settlements, and the spatial strategy is to direct growth to rural areas/communities that already have existing facilities on the basis that new growth will help maintain patronage and viability to existing community facilities in main rural settlements, rather than direct growth to smaller minor villages that do not have such provision.
<b>LPA Recommendation</b>	No significant changes required. The policy reference has changed to S15.
<b>Suggested changes to policy/wording</b>	<ul style="list-style-type: none"> <li>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].</li> <li>“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].</li> <li>“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</li> </ul>

	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].
<b>LPA Response</b>	Although it is appreciated that viability of delivering community facilities in isolation is challenging, the plan led system in Wales requires residential allocations to come through the RLDP process. It is therefore not considered appropriate to include an enabling development exception policy within the RLDP for provision of community facilities. Enabling development circumstances are set out in National Policy. Justifications for the removal of community facilities are set out in Policy CI1 ‘Retention of Existing Community Facilities’. This policy sets out the justification tests and evidence required, such as viability evidence and marketing of a community facility, in order to justify the loss of change of use. It is considered that these tests are robust and fair because in some instances a loss of a community facility may be appropriate and, therefore, it is not considered necessary to remove the word ‘unjustified’. Policy CI3 sets out the justification tests for loss of recreational facilities and public open space, and similarly these tests are considered to be robust and balanced This Policy allows for development adjoining settlement boundaries where appropriate and subject to detailed planning considerations. In terms of protecting green gaps/coalescence between villages proposals green wedge national policy will apply in the assessment. National Policy does allow for some community facilities if it maintains the openness of the green wedge land. Policy CI3 safeguards open space designations.
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S15.
<b>Public Open Space</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. Development Management Policies CI2, CI3 and CI4 provide set out the detailed policy framework relating to the provision of open space and the protection of open space and amenity land.
<b>LPA Recommendation</b>	No significant changes required, however minor wording changes have been made and the policy reference has changed to S15.
<b>Allotments</b>	<ul style="list-style-type: none"> <li>Allocation for allotments and community growing projects in Abergavenny would be welcomed. [ Abergavenny Town Council, Abergavenny &amp; District Civic Society].</li> </ul>
<b>LPA Response</b>	Comments noted. The policy provides support for allotment and community growing areas.
<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S15.
<b>Rural facilities</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> </ul>



<b>LPA Response</b>	Note that it can be difficult for new community and recreational facilities to come forward in rural settlements for various reasons, including viability. The policy, however, does support their provision. Furthermore, supporting Development Management policies protect existing community facilities within rural settlements (policy CI1) and protect recreation and open space (policies CI3 and CI4). The Policy does refer to community facilities being permitted adjoining settlement boundaries, this may be appropriate in some instances for cemeteries and allotments.
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S15.
<b>Other</b>	<ul style="list-style-type: none"> <li>• There are no community facilities on large strategic sites so car travel to facilities is essential [Private Individual x1].</li> <li>• What facilities? A new community hall in Magor and Undy where there are already several more that are barely used [Private Individual x1].</li> <li>• Proposed solutions do not instil confidence in a quick and robust improvement to the quality and diversity of the facilities [Private Individual x1].</li> <li>• Insufficient now [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The larger strategic developments allocated within the plan - Land at Abergavenny East (policy HA1) and Land to the east of Caldicot (policy HA2) - are being masterplanned and it has been demonstrated that it is viable and feasible to include community facilities as integral elements of the schemes, such as local centres and playing fields. Active travel and footpath links within the sites will enable travel to these community facilities by other means than car and active travel and footpath links from/to the site will link these strategic sites to existing community facilities. Magor Community Hub is a modern multi-functional facility that is considered positive asset to the community by many. If community facilities in the area are no longer fit for purpose then policy CI1 'Retention of Community Facilities' allows tests for their re-purpose. Policy is there to provide the supportive framework for community facilities and for their protection, however, as recognised it is not the only mechanism to bring them forward.
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S15.

## 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.

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Allocations</b>	<ul style="list-style-type: none"> <li>• Concerned at the low level of candidate sites in Abergavenny/Llanfoist – suitable allocations should be made. [Abergavenny Town Council, Abergavenny &amp; District Civic Society]</li> <li>• 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]</li> <li>• 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]</li> <li>• Important that land allocated for B uses are not released for other uses. [Abergavenny &amp; District Civic Society]</li> </ul>

	<ul style="list-style-type: none"> <li>• Cumulative impact on the Gwent Levels should be considered when assessing candidate sites in Magor/Undy. [Cllr Frances Taylor]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>It is acknowledged that limited candidate site options for employment use were received for the Abergavenny area and consequently, this has resulted in Abergavenny accommodating 3% of the employment land allocations. The Council will, however, continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the Cardiff Capital Region (CCR) and relevant partners.</p> <p>The RLDP aims to broadly align the spatial distribution of housing and employment growth through-out the County and provide a range and choice of sites. Detailed site allocations are set out in the Employment and Economy section of the Plan under Policies EA1a-EA1m.</p> <p>Policy E1 – Protection of Existing Employment Land seeks to ensure land identified for employment uses is not lost to alternative uses.</p> <p>The cumulative impacts of site allocations are considered as part of the Integrated Sustainability Assessment and the Habitats Regulations Assessment.</p> <p>A key requirement of the High-Level Candidate Site Assessment was the compatibility of the site with the RLDP Preferred Strategy, part of which was the requirement to be within or adjoining the settlement boundary or the ruling out of sites in the open countryside unrelated to any settlement identified in the Settlement Hierarchy. This approach is consistent with national guidance which aims to locate development in the most sustainable and well-linked settlements. The RLDP does, however, include a policy framework to consider rural enterprise and rural diversification proposals, which will be considered on the site-specific merits.</p>
<b>LPA Recommendation</b>	<p>Policy S12 of the Preferred Strategy is now titled Policy S10 – Employment Site Provision as a result of policy numbering being amended earlier in the Plan. The Deposit Plan makes provision for 57ha of employment land to meet the minimum requirement of 38ha identified in the Employment Land Review. The overarching principles of the policy remain the same, however, some wording changes have been made following a review of the whole Plan to better reflect the policy intention.</p>
<b>Job Provision</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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]</li> <li>• Policy should recognise the employment opportunities can come from various sources not just B use classes. [Grove Farm Estates &amp; Development]</li> <li>• 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]</li> <li>• Create jobs first and improve infrastructure, then look at the requirement for housing. [Private Individual]</li> <li>• Most people travel out 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]</li> </ul>
<b>LPA Response</b>	<p>The jobs figure contained in the RLPD is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the CCR. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County.</p>

	<p>The proposed level of growth aims to provide a balance of housing and employment growth, as required by national planning policy. This alignment means that economic growth will not be undermined by inadequate housing or be reliant on unjustified levels of in-commuting. Similarly, the level of housing will not give rise to high levels of out-commuting. Supporting this level of growth will reduce the need to travel and travel to work distances, which will assist in addressing our challenges in relation to the climate and nature emergency and contribute towards a more balanced demographic profile in Monmouthshire</p> <p>The RLDP recognises that not all job growth will come from B Use Class uses and includes a policy framework to assess employment proposals in a range of sectors including retail, tourism and commercial uses.</p>
<b>LPA Recommendation</b>	No change required.
<b>Site Specific</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• SAE1h – Land at Pill Row should be retained as an employment allocation. [F1 Real Estate Management Ltd]</li> </ul>
<b>LPA Response</b>	<p>The contribution the BAE Systems Glascoed site makes to the Monmouthshire economy is recognised, however, given the scale and location of the site in the open countryside, it is not considered appropriate or necessary to allocate it for an employment use. Any enhancement proposals that come forward would be considered on their planning merits within the context of the existing use of the site.</p> <p>Candidate Site CS0007 – Land adjacent to Pill Row has been considered as part of the High-Level Candidate Site Assessment. This concluded that the site should not progress to Level 3a of the Candidate Site Assessment due to it being contrary to national planning policy in relation to flooding.</p>
<b>LPA Recommendation</b>	No change required.
<b>General</b>	<ul style="list-style-type: none"> <li>• Reference to objection 5 – Minerals and Waste should be made in relation to Policy S12. [MPA]</li> <li>• 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]</li> <li>• No more out of town sites that make the population unhealthier – no fast-food places needed. [Private Individual]</li> </ul>
<b>LPA Response</b>	<p>In the interest of brevity, the RLDP objectives listed in the Links to Wider Framework box are those that are considered to be most pertinent to the policy in question, however, most RLDP objectives are linked to every policy some way. It is not considered necessary to list all objectives in relation to each policy. Consultation and dialogue with Dwr Cymru have been ongoing throughout the preparation of the plan and identification of site allocations.</p> <p>In accordance with national policy, the Plan has a town centre first approach to uses such as restaurants and take aways including fast food premises. Any proposals that come forward will be assessed against the RLDP policy framework on a site-by-site basis.</p>
<b>LPA Recommendation</b>	No change required.
<b>Site promoted in response to question 17</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• F1 Real Estate Management Ltd – SAE1h Pill Row [F1 Real Estate Management Ltd]</li> <li>• Private Individual – CS0016 – East of little Mill; CS0139 – Land at Former Petrol Station, Llanover [Private Individual]</li> </ul>

<b>LPA Response</b>	The BAE Systems site has been considered for its appropriateness to be allocated as a Protected Employment Allocation under policy EA2. However given the scale and its location of the site in the open countryside, it is not considered appropriate or necessary to allocate it for an employment use. Any enhancement proposals that come forward would be considered on their planning merits within the context of the existing use of the site. Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
<b>LPA Recommendation</b>	See the Candidate Sites Assessment Report for Candidate Site recommendations.

## 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 requesting that the policy wording be tighter to protect open countryside and Monmouthshire’s valuable farmland. Other comments were 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
<b>Supportive of diversification where there is clear link to local communities</b>	<ul style="list-style-type: none"> <li>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 corridors 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].</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Disagree for new build</b>	<ul style="list-style-type: none"> <li>Agree to the re-use of existing buildings but disagree to new buildings/sites [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The policy objectives of S13 are consistent with policy guidance set out in PPW, particularly paragraph 5.6.3.
<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Term definitions</b>	<ul style="list-style-type: none"> <li>This policy area uses terms such as ‘rural’ ‘agricultural’ and ‘farm diversification’ without being clear of the meaning which are quite different [Abergavenny &amp; District Civic Society].</li> </ul>
<b>LPA Response</b>	The terms used are consistent with PPW, TAN 6 and Future Wales, Policies 4 – Supporting Rural Communities and Policy 5 Supporting the Rural Economy. The supporting text to Policy S13 also provides further clarification on the terms rural enterprise and agricultural diversification, consistent with TAN 6.

<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Need for local policy for small holdings/ local production/ housing to support small holding food production</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; District Civic Society].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Strategic Policy S2 establishes the principle of rural enterprise dwellings and one planet development in locations outside of the settlement boundaries. Detailed guidance on the criteria applicable to each type of development is set out in TAN 6: Planning for Sustainable Rural Communities and One Planet Development Practice Guide and in accordance with WG guidance are therefore not repeated in the RLDP.
<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Employment uses limited to rural diversification</b>	<ul style="list-style-type: none"> <li>• Whilst appreciated that this 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].</li> </ul>
<b>LPA Response</b>	Policy S13 of the Preferred Strategy addresses both rural diversification and rural enterprises. The Deposit RLDP also supplements this with detailed criteria-based policies to assess any proposals that come in on their merits. This is sufficient to consider a range of proposals.
<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Rewording suggestions</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>

<b>LPA Response</b>	Highway considerations are covered by Strategic Policy S9 – Sustainable Transport and other detailed Development Management policies set out in the Deposit Plan, particularly MV1. Planning applications need to satisfy all relevant policies of the RLDP and therefore do not need to be repeated in S13 (now S11 in the Deposit Plan).
<b>LPA Recommendation</b>	No change required. However, due to changes earlier on the Deposit Plan the Strategic Rural Enterprise Policy is now numbered S11.
<b>Farmland to be protected</b>	<ul style="list-style-type: none"> <li>Value farmland [Private Individual x1].</li> <li>Our rural economy must be protected, and the development of agricultural land must not be allowed [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The RLDP seeks to protect best and most versatile agricultural land, however, this is not always possible in a Monmouthshire context given the high prevalence of high-quality agriculture land in the County. All four of the County's most sustainable settlements are surrounded by BMV agricultural land and it is therefore not possible to avoid development of such land via a different spatial strategy.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>The housing development in Usk runs contrary to all factors mentioned [Private Individual x1].</li> </ul>
<b>LPA Response</b>	The level and distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth proposed for Usk is considered to be appropriate for its position in the spatial hierarchy.
<b>LPA Recommendation</b>	No change required.

### 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:

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Supportive of policy</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Support welcomed.

<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S12.
<b>Suggests rewording to policy</b>	<ul style="list-style-type: none"> <li>Reword to ensure tourist facilities are located in areas that have the necessary facilities include toilets, parking and highway capacity [Cllr Louise Brown].</li> </ul>
<b>LPA Response</b>	Comment noted. Development Management Policy 'T1 New of Extended Tourism Accommodation and Facilities in the Open Countryside' sets out specific tests and criteria to ensure that tourism proposals are sustainable and are demonstrated to provide positive benefits. A Sustainable Tourism Need and Impact Assessment will be required to support tourism proposals.
<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S12.
<b>Opportunity for marketing of tourist sites</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. Monmouthshire benefits from extensive natural assets, some which act as a tourist attractor, such as BBNP, Wye Valley National Landscape (AONB) and Gwent Levels. It is important however that these natural assets are protected and Policy T1 sets out criteria to protect our natural environment, as well as other policies within the plan including S5 and NR1.
<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S12.
<b>Adverse impact on landscape</b>	<ul style="list-style-type: none"> <li>Monmouthshire is outstanding area of beauty and would be attractive to visitors but not if congestion problems continue [Private Individual x1].</li> <li>By allowing green spaces and historical landscapes to be developed would result in the decline of visitors to the area [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Comment noted. Development Management Policy T1 provides further guidance and policy tests for tourism proposals within Monmouthshire. One of the test criteria (g) is that the proposal must 'protect, maintain, and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment', criteria (i) requires 'necessary infrastructure capacity' and (j) requires proposals to 'prioritise, promote and facilitate sustainable travel and have safe and efficient highway design.' Tourism proposals will therefore be required to meet these criteria set out in the policy (as well as other criteria) and also demonstrate the need and impact of a proposal with a 'Sustainable Tourism Needs Impact Assessment.' Other policies within the plan will also be relevant and applicable to assessing tourism proposals.
<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S12. Policy T1 provides further guidance and tests for sustainable tourism proposals within Monmouthshire.
<b>Other</b>	<ul style="list-style-type: none"> <li>Visitor economy is minimal in Chepstow bar the races. Chepstow has lost its attraction and the points raised here are vague [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Comment noted. S12 and accompanying Development Management Policy T1 provides supportive framework for tourism proposals within Monmouthshire.
<b>LPA Recommendation</b>	No significant changes required, the policy reference has changed to S12.

## 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
<b>Support Policy Aims with amendments</b>	<ul style="list-style-type: none"> <li>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]</li> <li>Helpful to add a criterion noting that the storage and collection of waste or the unauthorised dumping of materials on sites without planning permission will be subject to enforcement proceedings. [Cllr Louise Brown]</li> </ul>
<b>LPA Response</b>	Policy W1 of the Deposit Plan sets out the Council’s policy approach to open windrow composting and anaerobic digestion in rural locations. Policy S15 (now S17) – criterion v) addresses the need for storage and collection of waste in new developments. Enforcement action is subject to separate regulations and therefore does not need to be set out in policy.
<b>LPA Recommendation</b>	No change required, however, note that Policy S15 – Sustainable Waste Management is Policy S17 in the Deposit Plan.
<b>Operational Issues</b>	<ul style="list-style-type: none"> <li>Introduction of wheely bins is not suitable. [Private Individual]</li> <li>No longer any municipal waste facility in Usk – noticeable increase in fly-tipping in the area since its closure. [Private Individual]</li> <li>Stop charging garden waste as an ‘extra’. [Private Individual]</li> <li>Reusable bags for recyclables will most likely result in litter being created as rubbish escapes bags. [Private Individual]</li> </ul>
<b>LPA Response</b>	Comments noted, however, these relate to the operational side of waste collection and have been passed onto the relevant development for information.
<b>LPA Recommendation</b>	No change required.

## 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
<b>Mineral Products Association (MPA) comments</b>	<ul style="list-style-type: none"> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>Reference to crushed rock replaced with sandstone and limestone for clarification on the crushed rock applicable in Monmouthshire’s case. Specific reference to mineral related infrastructure not considered necessary as that would have to form part of a planning application.</p> <p>The RTS2 states that land-won sand and gravel is dredged from the Severn Estuary and Bedwin Sands. Discussions with British Marine Aggregate Producers Association (BMAPA) in 2019 suggest that similar levels of marine aggregates production are likely to continue in future years. The RTS2 therefore concludes that it is reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade and applies zero apportionment to Monmouthshire for sand and gravel reserves. Reference to maintaining a 7-year land bank for sand and gravel reserves has been removed from the policy to avoid confusion.</p> <p>The RLDP and reliance on reserves at Ifton Quarry to meet its apportionment is consistent with the recommendations of RTS2. Recent planning applications to discharge conditions at Ifton Quarry indicate that Hanson Aggregates intend to commence working at the quarry.</p> <p>A buffer zone has been included in the Deposit Plan around Ifton Quarry. The Deposit RLDP notes that mineral planning applications will be considered against national planning policy set out in PPW and MTAN1, as well other detailed policies of the Plan.</p>
<b>LPA Recommendation</b>	<p>Change reference to crushed rock to sandstone and limestone in Strategic Policy S16.</p>

<b>Coal Authority Development Risk Plans</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>
<b>LPA Response</b>	Comments welcomed. Based on the information on the Coal Authority's interactive maps, there are no RLDP allocations located within identified Development High Risk Areas or features recorded to be present at surface and shallow depths. <a href="#">Interactive Map Viewer   Coal Authority (bgs.ac.uk)</a>
<b>LPA Recommendation</b>	No change required.
<b>Regional Collaboration</b>	<ul style="list-style-type: none"> <li>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]</li> <li>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]</li> <li>Not aware of any progress on the sub-regional statement of collaboration. [MPA]</li> <li>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]</li> </ul>
<b>LPA Response</b>	Monmouthshire CC is in ongoing discussions with the other authorities making up the Former Gwent Sub-Region and the latest position on satisfying the RTS2 apportionments is set out in the SSRC Position Paper.
<b>LPA Recommendation</b>	Continue ongoing discussions with the Former Gwent Sub-Region.
<b>General</b>	<ul style="list-style-type: none"> <li>Add reference to national and regional policy requirements to the policy wording for clarity. [Cllr Louise Brown]</li> </ul>
<b>LPA Response</b>	The policy and supporting text already set out national and regional policy requirements.
<b>LPA Recommendation</b>	No change required.

## 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
<b>Supports Policy</b>	<ul style="list-style-type: none"> <li>• Supports the principle of Policy S17 [Vistry].</li> <li>• Principle supported, 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].</li> <li>• Supports policy, but they are not reflected in the High-Level Assessment of the Candidates Sites [Mrs Shan Henshall].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Support welcomed.</p> <p>The High level Assessment of the Candidates Sites only considered fundamental constraints – it did not assess ecological and landscape considerations. Such matters were assessed as part of the stage 3a Candidate Site Assessment process.</p> <p>Candidate Sites that progressed from the High Level Assessment, have been subject to a detailed assessment through the stage 3a candidate site assessment process, which includes consideration of sites' impact on landscape character. Policy S15 as well as landscape policies LC1-LC5 seeks to ensure development proposals do not have an unacceptable impact on the surrounding landscape character.</p>
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Suggests word change</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Wording of the policy should be 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].</li> <li>• Add reference to maintaining and enhancing public open space, amenity land and heritage assets to the Policy [Cllr Louise Brown].</li> </ul>
<b>LPA Response</b>	<p>It is not considered appropriate or necessary to change the policy wording as suggested. One of the RLDP's key objective is to 'protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them', and in view of national policy PPW12 Chapter 6 and in order to meet the Section 6 Duty of the Environment (Wales) Act 2016 ,it is considered necessary for the policy to include strong and robust policy wording.</p> <p>Protection of and maintenance of open space and amenity land is covered under policies CI3 and CI4.</p> <p>Heritage assets has been added to the wording of Strategic Policy S5.</p>
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Biodiversity Gain</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>
<b>LPA Response</b>	The requirement for biodiversity gain/net benefit has been included in Development Management Policy NR1 Nature Recovery and Geodivseristy. Reference to net biodiversity gain is also made in the supporting text to Strategic Policy S5.
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.

<b>SuDS</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Support welcomed.
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Landscape</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. Specific policies in relation to the protection and enhancement of landscape character are set out in Development Management Policies LC1-LC5.
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Ecosystem resilience</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. Development Management Policies GI1 Green Infrastructure and NR1 Nature Recovery includes further text to enhance and strengthen GI and ecological resilience across Monmouthshire.
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Water environment</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> <li>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].</li> </ul>

<b>LPA Response</b>	Comment noted. Development Management Policies NR3 Protection of Water Sources and the Water Environment includes further text to convey the importance of protecting the water environment. A note within the policy text of NR3 has also been included in relation to leaving watercourses to run their natural courses.
<b>LPA Recommendation</b>	No significant changes required, the strategic policy reference has changed to S5.
<b>Canals</b>	<ul style="list-style-type: none"> <li>• Pleased to note canals are specifically recognised as GI although document would be improved if the Monmouthshire &amp; Brecon Canal was specifically recognised [The Canal and River Trust].</li> </ul>
<b>LPA Response</b>	Comment noted and canals are referred to within the supporting text to Policy GI1 and Policy NR3. It has not been possible to specifically reference the Monmouthshire and Brecon Canal in need to keep the RLDP succinct, however GI SPG is to be developed and specific reference could be made within this supporting guidance.
<b>LPA Recommendation</b>	No change required.
<b>Dark skies/light pollution</b>	<ul style="list-style-type: none"> <li>• Suggest policies relating to Tranquillity and Dark skies/light pollution are developed alongside S17 through a Development Management policy [NRW].</li> </ul>
<b>LPA Response</b>	Comment noted. The RLDP includes Development Management Policy LC5 Dark skies and lighting which refers to light pollution and protecting dark skies tranquillity.
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S5.
<b>Green Belt/Green Wedge</b>	<ul style="list-style-type: none"> <li>• Disappointing there is not mention of creating a green belt/wedge when allocating candidate sites [Abergavenny Town Council].</li> <li>• Policy support advice that assessments such as Green Belt/ Green Wedge designation should be done early in the process [Private Individual x1].</li> <li>• No reference to The ofwhich should have been published alongside the Preferred Strategy to inform where the proposed level of growth will go [Private Individual x1].</li> </ul>
<b>LPA Response</b>	A Green Wedge Assessment has been undertaken to inform the RLDP process.
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S5.
<b>Other</b>	<ul style="list-style-type: none"> <li>• Disappointing not to see a comparable strategic policy for maintaining protecting and enhancing the built fabric of the County especially the heritage features [ Abergavenny &amp; District Civic Society].</li> <li>• Grove Farm care villages can be delivered in line with S17 [Grove Farm Estates &amp; Development].</li> <li>• 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].</li> <li>• 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]</li> </ul>

	<ul style="list-style-type: none"> <li>How can Policy S17 be achieved if new housing is built on green space? [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Maintaining, protecting and enhancing Monmouthshire’s built environment is addressed within Policy S3 - Sustainable Placemaking and High Quality Design, as well as Policy HE1 Conservation Areas. National Policy Chapter 6 of PPW and TAN24 also provide policy protection and guidance to the historic built environment.</p> <p>Grove Farm care village Candidate Site has not progressed through the RLDP process.</p> <p>The Landscape Character Sensitivity Assessment is carried out by an independent accredited Landscape consultant.</p> <p>Brownfield opportunities have been considered through the site selection and candidate site process, however, there are limited brownfield opportunities in Monmouthshire and therefore greenfield opportunities have had to be considered to meet our key housing and employment requirements. Policy S5 and the supporting development management policies aim to protect and enhance our natural environment and there is a requirement to provide net biodiversity gain through mitigation and compensation of proposed developments, as set out in National Policy.</p>
<b>LPA Recommendation</b>	No significant changes required, policy reference has changed to S5.

### **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.

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>General support for existing DM policies</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Support noted.
<b>LPA Recommendation</b>	Updated Development Management policies are included in the Deposit Plan as a result of new evidence, guidance and local factors that have emerged as the Plan has progressed.
<b>Housing</b>	<ul style="list-style-type: none"> <li>State H1 should make it clear that Abergavenny and Llanfoist are classified as a single settlement [Grove Farm Estates &amp; Development].</li> <li>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].</li> <li>Supports retention of Policy H7 and the intention to reflect PPW 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 &amp; Private individuals x 2].</li> </ul>
<b>LPA Response</b>	Llanfoist is noted as forming part of the Primary Settlement of Abergavenny throughout the RLDP, with further details set out in the Sustainable Settlements Appraisal.

	<p>With regards to the appropriateness of infilling between existing buildings, there may instances where infilling between existing buildings that are not dwellings will be acceptable.</p> <p>Support for the affordable housing exception site policy approach is welcomed. Settlement boundaries have been reviewed as part of the evidence base.</p>
<b>LPA Recommendation</b>	No change required.
<b>Enterprise and Employment</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; District Society].</li> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Support for Policy E2 – Non-Allocated Employment Sites welcomed.</p> <p>A specific policy on working from home is not considered necessary and is sufficiently covered by other policies.</p>
<b>LPA Recommendation</b>	No change required.
<b>Rural Economy</b>	<ul style="list-style-type: none"> <li>• State RE3 should be renamed to 'Farm Business Diversification [Abergavenny &amp; District Society].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>The policy title 'Agricultural Diversification' given to policy RE3 is consistent with national guidance on this policy area.</p> <p>Agree with the suggestion to include reference to air pollution in policy RE5.</p>
<b>LPA Recommendation</b>	<p>No change required in relation to policy RE3.</p> <p>Add reference to air pollution in policy RE5 – Intensive Livestock/Free Range Poultry Units.</p>
<b>Retail</b>	<ul style="list-style-type: none"> <li>• Suggest RET1 and RET2 policies need to be consistent with Placemaking Strategies proposed under S10 [Abergavenny Town Council and Abergavenny &amp; District Society].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. The need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands, is a key objective of the RLDP. The policies in the Retail and Commercial Centres chapter reflect this ambition.</p>
<b>LPA Recommendation</b>	No change required.

<b>Landscape</b>	<ul style="list-style-type: none"> <li>• Suggest LC6 (Green Wedges) should be fully adopted and incorporated in the RLDP to meet S17 [Abergavenny Town Council].</li> <li>• 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].</li> <li>• Suggests any changes to LC6 (Green Wedges) should be consulted upon before being incorporated into the Plan [Private Individual x 1].</li> <li>• Review of LC6 (Green Wedges) is supported [Taylor Wimpey].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. The Green Wedge policy has been included within the RLDP Deposit Plan with relevant amendments and is now referenced as Policy GW1. The Policy sets out the green wedge designations in the county. The definition and purposes of green wedges is set out in PPW12 and, therefore, it is not necessary to repeat this in the policy.</p> <p>Green wedge designations will be consulted upon as part of the Deposit Plan consultation.</p> <p>A Green Wedge Assessment has been undertaken to inform the RLDP process.</p>
<b>LPA Recommendation</b>	Policy GW1 (formerly LC6) has been amended to reflect the findings of the Green Wedge Assessment.
<b>Renewable Energy &amp; Energy Efficiency</b>	<ul style="list-style-type: none"> <li>• State SD1 and SD2 need greater commitment to deliver this policy in the RLDP to meet S17 [Abergavenny Town Council].</li> </ul>
<b>LPA Response</b>	The relationship between renewable energy (formerly SD1) and sustainable construction (formerly SD2) with green infrastructure and nature conservation objectives is fully recognised and reflected in the RLDP policy framework. Section 10 of the Deposit RLDP provides an updated policy framework in relation to Climate Change requirements including a requirement for new homes to be net zero, renewable energy generation targets and assessment criteria for renewable energy proposals.
<b>LPA Recommendation</b>	Refer to Section 10 of the Deposit RLDP for the updated climate change policy framework.
<b>Flooding</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• Suggest policy is retained due to climate change and likelihood of more flooding, also to ensure local considerations aren’t lost by deleting [Private individuals x 3]</li> </ul>
<b>LPA Response</b>	The importance of preventing flooding is recognised within the RLDP, however, national policy contained within PPW12 and TAN 15 set out detailed national policy on development and flood risk and therefore do not need to be repeated in the Plan. Policy S4 – Climate Change, does however, require development to address the causes of, and adapt to the impacts of climate change including avoiding locating development in areas at risk of flooding and the incorporation of Sustainable Drainage Systems (SuDs).
<b>LPA Recommendation</b>	No change required.
<b>Movement</b>	<ul style="list-style-type: none"> <li>• Supports the retention of MV1 (proposed developments and highway considerations) and the intention to update it in line with PPW refer to text in PPW11 which states ‘Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed’</li> </ul>



	<p>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].</p> <ul style="list-style-type: none"> <li>• Note MV4 (cycleways) relates to leisure cycling and should cover all aspects of Active Travel [Abergavenny Town Council &amp; Abergavenny &amp; District Society].</li> <li>• 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 &amp; River Trust (Glandwr Cymru)].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. Policy MV1 has been included in the Deposit Plan with some amendments – the new policy reference is ST1 Sustainable Transport Proposals. Policy ST1 has been updated in accordance with PPW12 and the policy supports car-free development in town centre locations where practicable.</p> <p>MV4 has been removed as cycling provision and connections is covered with Policy S13 and ST1</p> <p>MV6 has been amended to ST6 Protection of Redundant Routes where the focus is on re-purposing such routes for sustainable transport connections. Protection of canals and its wide-ranging benefits is covered in Policy S5 Green Infrastructure, Landscape and Nature Recovery and NR3 Protection of Water Sources and the Water Environment.</p> <p>MV9 has been retained and updated. The new reference for the policy is ST2 Highway hierarchy.</p>
<b>LPA Recommendation</b>	<p>Policies amended as set out above.</p>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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 &amp; District Society].</li> </ul>
<b>LPA Response</b>	<p>Comments noted, the detailed policies within the RLDP in the historic environment section cross reference national guidance and relevant legislation including the Historic Environment (Wales) Act, PPW12 and TAN24: The Historic Environment. Minor amendments have been made to both the policies and supporting text.</p>
<b>LPA Recommendation</b>	<p>The policies set out within the Historic Environment section have been updated to reflect updated National Policy , however none of the changes are considered to be significant.</p>
<b>Community Facilities</b>	<ul style="list-style-type: none"> <li>• 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].</li> </ul>

<b>LPA Response</b>	CRF2 (now referenced as CI2 in the Deposit Plan) has been updated to be in accordance with the latest Fields in Trust (FIT) standards. The Council has undertaken an Open Space Audit. This assesses the quantity of formal and informal public open space of existing provision within the County and compares this provision with the benchmark standards endorsed by FIT. The Open Space audit can be used as a means of justifying the provision of new recreational facilities and/or remedying local deficiencies in provision. It can also be used as a means of safeguarding and enhancing existing facilities as appropriate, as well providing the evidence and justification in seeking S106 financial obligations from developers where new housing development increases local recreational need.
<b>LPA Recommendation</b>	Policy CI2 (formerly Policy CRF2) updated to reflect FIT standards.
<b>Green Infrastructure</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. Policy GI1 has been updated to align with S17 (Policy reference changed to S5 in the Deposit Plan).
<b>LPA Recommendation</b>	Policy GI1 updated to align with Strategic Policy S5 and RLDP objectives.
<b>Waste</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	The principles of Adopted LDP policy W2 – Waste Recovery Facilities: Household, are considered relevant and necessary, but are considered to be adequately covered by other RLDP policies.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>Suggest there isn't enough detail in the table in order to provide comment as no supporting documentation [Private individual x 2].</li> </ul>
<b>LPA Response</b>	Comments noted, the commentary provides a summary of the findings of officer working groups, however it is noted that this response is indicative and that changes would be made as new evidence, guidance or local factors emerge as the Plan progresses. As a consequence. the policies have all been reassessed in the formulation of the Deposit Plan.
<b>LPA Recommendation</b>	No change required.

## Question 24 – Do you have any other 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
<b>Archaeology/ Historic Guidance</b>	<ul style="list-style-type: none"> <li>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].</li> <li>GGAT should be consulted at part of Candidate Site consultation review [CADW].</li> </ul>
<b>LPA Response</b>	Comments noted. GGAT have been consulted on all Candidate Sites that remained in the process (Stage 3A) following the high level sift of Candidate Sites. GGAT will continue to be consulted throughout the RLDP process.
<b>LPA Recommendation</b>	No change required.
<b>Housing mix</b>	<ul style="list-style-type: none"> <li>The suggestion that the Council are going to dictate private market mix is not supported [Redrow].</li> </ul>
<b>LPA Response</b>	Comment noted. The housing mix policy included in the plan is in place to encourage a better mix of house types, tenure and size to help address demographic and affordability challenges facing the County. The policy does not dictate the private market mix but does point to the priority for small to medium size homes to help address these challenges.
<b>LPA Recommendation</b>	No change required.
<b>Net zero carbon ready</b>	<ul style="list-style-type: none"> <li>The Council need to define the term 'net zero carbon ready' homes [Redrow].</li> </ul>
<b>LPA Response</b>	In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included a change to the policy requirement for the environmental credentials of the new homes to be 'net zero carbon' rather than 'net zero carbon ready'. The Deposit Plan includes policy NZ1 which sets out the definition and the Council's standards for delivering Net Zero Carbon Homes'.
<b>LPA Recommendation</b>	Term 'Net Zero Carbon' homes is defined with Policy NZ1.
<b>Green Belt/ Green Wedge</b>	<ul style="list-style-type: none"> <li>Disappointed in lack of inclusion for Green Wedge provision at this stage [Abergavenny Town Council, SOUL]</li> <li>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 &amp; District Civic Society, SOUL].</li> <li>Green Wedge to west of Rogiet should be rolled back to allow for development [BB3 Limited, Manor Farm Partnership, Private Individual x3].</li> <li>Strongly object to the principle of a Green Belt in Monmouthshire [BB3 Limited, Manor Farm Partnership, Private Individual x3].</li> <li>Question why the Green Belt included in Future Wales is not included in the Key Diagram [Persimmon Homes East Wales].</li> <li>Vital that current Green Wedges are maintained [Private Individual x1].</li> <li>Important to preserve the Green Wedge between Shirenewton and Mynyddbach [Private Individual x1].</li> </ul>
<b>LPA Response</b>	A Green Wedge Assessment has been undertaken to inform the RLDP process. The green wedge west of Rogiet has been considered as part of the Green Wedge Assessment.

	<p>Future Wales Policy 34 advises that a Green Belt in the SE Wales region is to be designated as part of a Strategic Development Plan (SDP) for SE Wales. The Spatial Strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale having regard to the identified and longer term need for development land, the effects of development pressures in areas beyond the Green Belt, the need to minimise demand for travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a SDP for the South East Wales Region.</p> <p>It is not considered necessary to include the indicative Green Belt in the Key Diagram as the boundary will be informed by the SDP.</p> <p>The Green Wedge Assessment ensures that land has been reviewed relevantly to the updated Green Wedge purposes set out in PPW. National Policy sets out the guidance for the Green Wedge protection and expectations for some development proposals that maintain the openness of Green Wedge land.</p> <p>The Green Wedge between Shirenewton and Mynyddbach has been considered as part of the Green Wedge Assessment.</p>
<b>LPA Recommendation</b>	Green wedges have been assessed as part of the Green Wedge Assessment, the findings of which are set out in Development Management Policy GW1.
<b>Climate Emergency</b>	<ul style="list-style-type: none"> <li>There is a lot in the Preferred Strategy that conflicts with the Climate and Ecological emergencies [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Brownfield opportunities have been considered through the site selection and candidate site process, however, given the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered to meet our housing and employment requirements. There is a suite of policies in the Deposit Plan seeking to address climate and nature emergencies, including: NZ1 Net Zero Homes, CC2 Renewable Energy Allocation, CC3 Renewable Energy Generation, GI1 Green Infrastructure and NR1 Nature Recovery and Geodiversity.
<b>LPA Recommendation</b>	No change required.
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>Community facilities are currently at saturation and there is little community spirit [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Comments noted. The RLDP provides support through the policy framework for new and improved community facilities.
<b>LPA Recommendation</b>	No change required.
<b>Green Infrastructure</b>	<ul style="list-style-type: none"> <li>There is no cross reference to the MCC Green Infrastructure Plan [Abergavenny Town Council].</li> </ul>
<b>LPA Response</b>	Policy GI1 Green Infrastructure and the supporting text cross references MCC'S GI Strategy, as well as the GI SPG.
<b>LPA Recommendation</b>	Cross reference in the supporting text of Policy GI1.
<b>Water Environment/Phosphates</b>	<ul style="list-style-type: none"> <li>Forest of Dean is also concerned with regard to phosphate issues in the River Wye Catchment area though development is not currently restricted [FODDC].</li> <li>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].</li> </ul>

	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	The supportive text of Policy NR3 Protection of Water Sources and the Water Environment includes an explanation of DCWW's AMP process and is also addressed in paragraphs 4.1.3 – 4.15 in the key issues of the Deposit Plan. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Housing allocations, including a strategic site, have therefore been allocated in the Deposit Plan in Monmouth.
<b>LPA Recommendation</b>	The Deposit Plan has been updated to reflect the updated position that DCWW are committed to implement sewerage waste water treatment improvements. This includes allocating sites within Monmouth.
<b>Designated Sites</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	The Severn Estuary Marine Site is referenced throughout the Deposit Plan and has also been considered throughout the HRA process. Protection Policy NR2 'Severn Estuary Recreational Pressure' has been included in the plan as a result of the HRA recommendation.
<b>Plan Delivery/ timeline</b>	<ul style="list-style-type: none"> <li>The likely adoption date will mean the Plan will have less than 10 years 'live' [Torfaen County Borough Council].</li> <li>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 2033 with associated amendments to the housing requirement [Edenstone].</li> </ul>
<b>LPA Response</b>	Comments noted. The development plans process does not allow for the Plan period to be extended beyond 2033.
<b>LPA Recommendation</b>	No change required.
<b>Collaborative working</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	No change required.
<b>Suggestions</b>	<ul style="list-style-type: none"> <li>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 plan's strategy has changed from the previous strategy [HBF].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Welsh Government formally responded to the Preferred Strategy consultation in January 2023 with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth

	and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.” In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Plan includes an extensive evidence base which will provides up-to -date robust evidence to support policy formulations and the information set out in the Plan. The evidence base will be available to view at Deposit consultation.
<b>LPA Recommendation</b>	No change required.
<b>Candidate Sites</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• Would have been easier to comments on sites if details of infrastructure improvements had been provided [Private Individual x1].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	All Candidate Sites have been subject to detailed assessments – refer to the Candidate Sites Methodology and Candidate Sites Assessment Report for further details. An Infrastructure Delivery Plan has been prepared to support the Deposit Plan and will be published as part of the Deposit Plan.
<b>LPA Recommendation</b>	No change required.
<b>Candidate Sites for Protection</b>	<ul style="list-style-type: none"> <li>• The criteria for assessment for protection does not exist. Concerned that sites for protection are now disadvantage compared with those for development [SOUL].</li> </ul>
<b>LPA Response</b>	Protection Candidate Sites submissions have been assessed via other mechanisms forming part of the RLDP evidence base, which most closely relate to the suggested reason for protection. Further details are set out in the Candidate Site Assessment Report and the RLDP evidence base.
<b>LPA Recommendation</b>	No changes required.
<b>New Settlement</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	Paragraph 3.53 of PPW12 states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy does therefore not allow New Settlements to be considered as part of the LDP process.
<b>LPA Recommendation</b>	No change required.
<b>Chepstow</b>	<ul style="list-style-type: none"> <li>• Concerned about the lack of recognition of specific issues relating to Chepstow [ The Chepstow Society].</li> </ul>

	<ul style="list-style-type: none"> <li>In Chepstow it will fail to achieve its objectives until there is a fundamental overhaul of the Business Rate System [Private Individual x1].</li> </ul>
<b>LPA Response</b>	Comments noted. The Plan's issues are considered on a county-wide basis. The Infrastructure Delivery Plan considers specific infrastructure requirements for development proposals at Chepstow. Business Rates are not within the remit of MCC.
<b>LPA Recommendation</b>	No change required.
<b>Reference errors</b>	<ul style="list-style-type: none"> <li>Should reference to Gloucestershire Council in paragraph 2.2 be GCC? [Gloucestershire County Council].</li> </ul>
<b>LPA Response</b>	Comment noted.
<b>LPA Recommendation</b>	Reference amended accordingly.
<b>Consultation process</b>	<ul style="list-style-type: none"> <li>Insufficient time given to prepare response to the consultation exercise from the Raglan drop-in session to the end of the consultation [Raglan Community Council].</li> <li>Would welcome informal consultation with community groups prior to the publication of the Deposit Plan [Abergavenny &amp; District Civic Society].</li> <li>Online system to make comments is difficult to use [Private Individual x1].</li> <li>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].</li> <li>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 to serve [Cllr Christopher Edwards, Private Individual x1].</li> <li>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].</li> <li>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].</li> <li>Consultation documents animation and forms too complex suggesting feedback is not genuinely wanted [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Raglan drop in was 19<sup>th</sup> January 2023 and deadline for comments was 30<sup>th</sup> January 2023. This gave 11 days between the drop in session and deadline for comments which is considered sufficient. Furthermore there were other drop in sessions available from the 12<sup>th</sup> December, including a drop-in session on the 19<sup>th</sup> December County Hall Usk and virtual session that was recorded and available to view on the planning policy website.</p> <p>Noted - consideration will be given to the potential for informal consultation prior to the formal Deposit Plan consultation.</p> <p>Noted in relation to animation. The Easy Read is produced to try and make the key information more accessible to communities. Note feedback that consultation forms are too complex and MCC will consider ways to improve the consultation/feedback process.</p> <p>All comments/ representations are considered throughout the plan making process. The Deposit Plan is considered to represent the best interests of Monmouthshire's residents by providing a sustainable level of growth that addresses our local issues and objectives including the delivery of much needed affordable homes, supporting sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>Deposit consultation will allow further comment on the strategic policies as well as the details Development Management Policies.</p>

<b>LPA Recommendation</b>	Consider opportunities to improve the RLDP consultation process, as appropriate.
<b>Other</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Wrong conclusions based on incomplete analysis [Private Individual x1].</li> </ul>
<b>LPA Response</b>	<p>Comments noted.</p> <p>The Deposit Plan sets out the growth and spatial strategy to facilitate sustainable growth in the County up to 2033, embodying the principles set out in the Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. The Strategy has been informed by a wide range of robust evidence and responds to a number of key challenges that have arisen during the plan preparation process. Within this context, the RLDP seeks to deliver on the Vision and Objectives and meet our core purpose of delivering sustainable and resilient communities</p>
<b>LPA Recommendation</b>	No change required.

**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
<b>Commuting</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Private individuals x 3]</li> <li>• 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 &amp; District Civic Society].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. It is recognised that Monmouthshire has a relatively low proportion of population that speak, read and write Welsh compared to other Local Authorities in Wales. However, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire also has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024).</p>



<b>LPA Recommendation</b>	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>No effect</b>	<ul style="list-style-type: none"> <li>Suggest the proposals will have no effect on Monmouthshire and the use of the Welsh Language [Abergavenny &amp; Crickhowell Friends of the Earth &amp; Usk Civic Society].</li> </ul>
<b>LPA Response</b>	Comment noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
<b>LPA Recommendation</b>	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>Not relevant</b>	<ul style="list-style-type: none"> <li>Suggest Welsh Language is not relevant to planning policy [Private individual x 1].</li> <li>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]</li> </ul>
<b>LPA Response</b>	Comments noted. National guidance refers to the importance of the consideration of the needs and interests of the Welsh language in sustainable placemaking in Wales. The Plan reflects this approach.
<b>LPA Recommendation</b>	The Plan supports the aims of national Policy and the Monmouthshire Welsh Education Strategic Plan (WESP) and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>Co-operative and community led housing</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted, while no allocations are proposed specifically for co-operative and community-led housing these will be considered on a case-by-case basis through planning applications.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> <li>Suggest family literacy classes should be offered to make learning Welsh together fun [Private individual x 1].</li> <li>State candidate sites must have adequate provision for education in Welsh Language medium [Private individual x 1].</li> </ul>

<b>LPA Response</b>	Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
<b>LPA Recommendation</b>	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>Site promotion</b>	<ul style="list-style-type: none"> <li>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 &amp; Development].</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
<b>LPA Recommendation</b>	No change required.

**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.

<b>Key Theme</b>	<b>Summary of Points Raised</b>
<b>Proximity to England</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted. The promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
<b>LPA Recommendation</b>	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>Cymraeg 2050, Welsh Language</b>	<ul style="list-style-type: none"> <li>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)].</li> </ul>

<b>Measure and Strategy</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted, the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh is identified in the Monmouthshire Welsh Education Strategic Plan (WESP). Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024), children in new developments across the County will have access to these schools should they wish to attend a Welsh medium primary school. Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
<b>LPA Recommendation</b>	The Plan supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language.
<b>Welsh Language Impact Assessment</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted, it is recognised that there is an absence of a Welsh Medium Secondary School within the Monmouthshire area and that children accessing Welsh-medium secondary provision travel to Ysgol Gyfun Gwynllw in Torfaen County Borough Council area and Ysgol Gyfun Gwent Is Coed in Newport City Council area. This provision is delivered through partnership agreements with Torfaen County Borough Council and Newport City Council. Monmouthshire provides free school transport for children attending these schools. The Integrated Sustainability Appraisal Report includes a Welsh Impact Assessment for the Monmouthshire area.
<b>LPA Recommendation</b>	Continue to work with Torfaen County Council and Newport City Council to ensure there are no barriers for children in Monmouthshire attending Welsh medium secondary schools.
<b>Site promotion</b>	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].
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Site Assessment Report.
<b>LPA Recommendation</b>	No change required

### 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
<b>Housing</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Support noted.
<b>LPA Recommendation</b>	No change required.
<b>Affordable housing</b>	<ul style="list-style-type: none"> <li>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 &amp; The Coldbrook Estate].</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	No change required.
<b>Economy and employment</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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]</li> </ul>
<b>LPA Response</b>	Comments noted. The ISA has been undertaken by AECOM and follows the relevant regulations appropriate for the different plan stages. An ISA of the Deposit Plan and its detailed allocations and polices has also be undertaken. This includes assessment of Policy RE1 relating to Secondary and Main Rural Settlements Employment Exception sites.
<b>LPA Recommendation</b>	Comments on Policy RE1 have been considered in the production of the Deposit ISA.
<b>Climate change</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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 &amp; District Civic Society].</li> </ul>

<b>LPA Response</b>	This comment does not relate specifically to the ISA. The Deposit Plan sets out a detailed policy framework, including in relation to climate change, and is supported by a robust and comprehensive evidence base. With regards to significant effects being recognised in the ISA, the ISA recognises a continuation of baseline trends (such as high levels of commuting) rather than a significant deviation from the baseline and thus significant effects.
<b>LPA Recommendation</b>	Refer to the Deposit Plan and supporting evidence base for further information.
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted. The assessment of alternatives is essentially a 'policy-off' assessment, judging likely effects in relation to the existing baseline at a strategic level. The likely significance of effects is concluded within Part 2 of the ISA, which assesses the preferred strategy as a whole recognising precise site allocations and supporting policy mitigation. Inevitably though, effects in relation to the historic environment are often dependent upon detailed design and layout proposals at sites, detail which is unknown at the strategic scale of assessment.
<b>LPA Recommendation</b>	No change required.
<b>Public transport</b>	<ul style="list-style-type: none"> <li>Suggest references to bus services should be treated with caution as they are particularly liable to change [Abergavenny &amp; District Civic Society].</li> </ul>
<b>LPA Response</b>	Comment noted.
<b>LPA Recommendation</b>	No change required.
<b>Welsh Language</b>	<ul style="list-style-type: none"> <li>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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	Comments noted, a Welsh Language Impact Assessment is incorporated into the ISA which considers the likely effects of the Plan on the use of the Welsh language. In accordance with Welsh Government TAN20: planning and the Welsh Language a statement of how this has been considered and addressed is included in the ISA of the Deposit Plan. In addition to this the Deposit Plan contains a section on the Welsh Language however, there is not a specific policy. Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. National planning policies provide advice regarding the consideration of Welsh language in development and will be taken into account in the determination of planning applications, where appropriate.
<b>LPA Recommendation</b>	The Plan will support steps taken within proposals to safeguard and grow the use of the Welsh language.

<b>Agricultural Land</b>	<ul style="list-style-type: none"> <li>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 &amp; Private individual x 1].</li> </ul>
<b>LPA Response</b>	Comment noted. All options included within the ISA must be considered to be reasonable. A no growth option is not considered to be a reasonable option as it would not meet Monmouthshire's core purpose of building sustainable and resilient communities nor would it meet the RLDP objectives.
<b>LPA Recommendation</b>	No change required.
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	<p>Comment noted, the Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.</p> <p>The GB will be designated via a Strategic Development Plan for SE Wales in accordance with Future Wales. The spatial strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales. Monmouthshire's primary settlements fall outside of the indicative Green Belt boundary. National planning policy allows for extensions to existing settlements within and adjoining the Green Belt of appropriate scale having regard to the identified and longer-term need for development land, the effects of development pressures in areas beyond Green Belt, the need to minimise demand travel, and the purpose of the overall greenbelt designation. It states that this may require land to be safeguarded and boundaries of proposed Green Belts must be carefully defined to achieve this.</p>
<b>LPA Recommendation</b>	No change required.
<b>Site specific - Abergavenny</b>	<ul style="list-style-type: none"> <li>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 &amp; District Civic Society].</li> <li>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 &amp; District Civic Society].</li> <li>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 &amp; The Coldbrook Estate].</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of proposed site allocation policies in Abergavenny.

<b>Site specific – Caldicot</b>	<ul style="list-style-type: none"> <li>• 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].</li> <li>• 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].</li> <li>• 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].</li> <li>• Suggests placemaking does not consider impacts on existing settlements such as Portskewett and Crick, which will likely be negative [Private individual x 1].</li> </ul>
<b>LPA Response</b>	<p>Comments noted and considered in the Deposit ISA. A Habitats Regulations Assessment has been produced for the Deposit RLDP, this includes assessment of proposed site allocation policies.</p>
<b>LPA Recommendation</b>	<p>An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Caldicot and the wider Severnside area.</p>
<b>Site specific - Chepstow</b>	<ul style="list-style-type: none"> <li>• 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 &amp; Private individual x 1].</li> <li>• Suggest the times quoted for walking routes do not consider topography and are therefore misleading [Cllr Christopher Edwards &amp; Private individual x 1].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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 &amp; Private individual x 1].</li> <li>• 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].</li> </ul>
<b>LPA Response</b>	<p>Comments noted. A response from the Council to the alternatives assessment is provided in Chapter 7 of the ISA Report. The methodology for calculating walking routes is described within the assessment, as a strategic assessment the outcomes are treated as broad indicators. The ISA has considered areas where air quality issues have been formally noted with the declaration of an Air Quality Management Area. An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Chepstow. Option D (Bayfield) has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes were agreed by Council, Option E Land at Mounon Road was included in its place</p>
<b>LPA Recommendation</b>	<p>No change required.</p>
<b>Area specific - Monmouth</b>	<ul style="list-style-type: none"> <li>• Support the ISA findings that recognise the significance of Monmouth as a Primary Settlement [Vistry Group &amp; Private individual x 1].</li> </ul>

<b>LPA Response</b>	Comments noted. An ISA of the Deposit Plan and its detailed allocations and polices has been undertaken. This includes assessment of site allocation policies in Monmouth
<b>LPA Recommendation</b>	No change required.
<b>Appendix 1 - Review of Plans, Policies, Programmes and Strategies</b>	<ul style="list-style-type: none"> <li>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].</li> </ul>
<b>LPA Response</b>	Comment noted, the Review of Plans, Policies, Programmes and Strategies makes it clear that the list is not exhaustive. No Minerals, Waste or Transport Plans have been included for adjoining Local authorities.
<b>LPA Recommendation</b>	No change required.
<b>Promotion of sites</b>	<ul style="list-style-type: none"> <li>Leathdunn Ltd promote CS0036 Land west of B4293 and north of Devauden [Johnsey Estates UK].</li> <li>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].</li> <li>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].</li> <li>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].</li> <li>Barwood Development Securities Limited promote CS0165 Mounon 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].</li> <li>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].</li> </ul>
<b>LPA Response</b>	The Council have provided reasons for the progression and rejection of options in Chapter 7 of the Deposit ISA. For a fair assessment of all options, site promoter details are not considered in detail, as these may not be available for all options. The ISA has informed the site selection process and has been updated as part of the Deposit Plan process.
<b>LPA Recommendation</b>	No change required.
<b>Other</b>	<ul style="list-style-type: none"> <li>Suggest the ISA adds little value to the plan-making process [Abergavenny &amp; District Civic Society].</li> </ul>



<b>LPA Response</b>	Comment noted, the SA/SEA is an integral part of the plan making process and a requirement of the Planning and Compulsory Purchase Act 2004 (section 62(6)). The SA/SEA process is integral to every stage of the plan preparation process.
<b>LPA Recommendation</b>	No change required.

## 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
<b>Key HRA Considerations</b>	<ul style="list-style-type: none"> <li>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]</li> <li>NRW agree with identified pathways. [NRW]</li> <li>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]</li> <li>Undertaking an HRA is vitally important and must be applied to all allocations. [Private Individual]</li> <li>Integrity of the Usk Bat Sites SAC should be taken extremely seriously. [Private Individual]</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	Continue to work collaboratively with the relevant organisations, including NRW, as part of the ongoing HRA of the RLDP.
<b>Mitigation Strategies</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>
<b>LPA Response</b>	Comments noted.
<b>LPA Recommendation</b>	Review relevant recreational mitigation strategies as part of the ongoing HRA recommendations work.
<b>Lacking information</b>	<ul style="list-style-type: none"> <li>Frequent references without detailed information on proposals they cannot be assessed. Detail will not be available until the Deposit Plan is published so cannot be evaluated within comments on the Preferred Strategy. [Abergavenny &amp; Crickhowell FoE, Private Individual, Usk Civic Society]</li> <li>Does the HRA completely comply with the Environment (Wales) Act 2016? [Private Individual]</li> </ul>
<b>LPA Response</b>	The HRA has been undertaken by Aecom Consultants and follows the relevant regulations appropriate for the different plan stages. A HRA of the Deposit Plan and its detailed allocations and polices has also be undertaken.

<b>LPA Recommendation</b>	No change required.
<b>Phosphates</b>	<ul style="list-style-type: none"> <li>• 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 &amp; District Civic Society]</li> <li>• 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]</li> </ul>
<b>LPA Response</b>	<p>The Preferred Strategy (2022) proposed no new site allocations in Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge and also assumed no existing planning permissions or small/windfall sites could come forward. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. Welsh Government's response letter to the 2022 Preferred Strategy advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Following Welsh Government's confidence in the removal of this constraint, Council agreed in October 2023 to the identification of a strategic site in Monmouth as well as including allowances towards windfall and infill allowances and existing commitments already with planning permission.</p> <p>The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to Dwr Cymru's planned improvements to waste water treatment works and NRW's review of permits. Commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW's review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.</p>
<b>LPA Recommendation</b>	In accordance with the October 2023 Council Report, the Deposit Plan allows for growth in Monmouth. The Council will continue to work collaboratively with the relevant organisations with regard to phosphates and water quality issues.
<b>Sites promoted in response to question 28</b>	<ul style="list-style-type: none"> <li>• BB3 Ltd – CS0216 Hereford Rd, Monmouth [BB3 Ltd]</li> <li>• Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual]</li> <li>• Manor Farm Partnership – CS0216 Hereford Rd, Monmouth [Manor Farm Partnership]</li> <li>• Private Individual – CS0216 Hereford Rd, Monmouth [Private Individual]</li> <li>• Private Individual – Cs0216 Hereford Rd, Monmouth [Private Individual]</li> </ul>
<b>LPA Response</b>	Candidate site submissions have been considered as part of the candidate site assessment. Individual site recommendations can be viewed in the Candidate Sites Assessment Report.
<b>LPA Recommendation</b>	See the Candidate Sites Assessment Report for Candidate Site recommendations.

## 4. Candidate Sites Register Summary of Representations

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## Strategic Sites

### Abergavenny

#### Candidate Site: CS0213 Abergavenny East

Responder:

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| <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Southern boundary adjoins the essential setting of Coldbrook House, Caederwen and other farms shown on the Tithe, exist with similar field boundaries.<br/><i>General support for the site:</i></li> <li>2. Abergavenny Town Council and Abergavenny &amp; District Civic Society state that objection would be made to anything but a strategic decision that development here has to be the long-term future of Abergavenny. Various physical constraints make this area the only substantial option for town growth. The masterplanning EA should proceed if the feasibility and viability of land use allocation and the phasing of development are to be soundly based for inclusion in the replacement plan.</li> <li>3. Responders feel that the site boundaries should extend to encompass more land adjoining A465 for a junction with the trunk road, station car parking and an active travel crossing to Station Road as well as providing a more direct access to Ross Road. Any active travel bridge or subway crossing the railway and the A465 must be attractive to use in all conditions.</li> <li>4. The site sponsor, The Coldbrook Estate, has submitted supporting documents and includes the following points: <ul style="list-style-type: none"> <li>• The site presents a logical extension to the town that could be well connected local services and facilities.</li> <li>• The land is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre.</li> <li>• Matters considered as part of delivering the vision for Abergavenny East includes provision of significant infrastructure, including a cycle footway bridge over the A465 and railway.</li> </ul> </li> <li>5. Many responders offer support for the site – which should benefit from its proximity to the A465, the railway station and services and facilities within the town.</li> <li>6. Proximity of the rail station to the site has been emphasised and it is felt that a frequency of 4 trains per hour, twice the current frequency, is necessary.</li> <li>7. Responders feel that the site should incorporate a suitable solution to the parking problem at the railway station.</li> <li>8. Responders feel that the area is generally screened from A465 by trees and there are hedgerows and small woodlands that should be incorporated into the layout of development.</li> <li>9. Responders state that the agricultural land appears to be of 3a and 3b value.</li> <li>10. Responders suggest that the ecology of the site could be improved by development that incorporates landscaping that encourages biodiversity.</li> <li>11. Responders feel that a smaller number of houses than proposed would be more in keeping the ambience of the town and area.</li> <li>12. Support for the site as the development would be near places of employment to a minimise travel to work.</li> </ol> | <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. The Coldbrook Estate</li> <li>5. 188 Private Individuals.</li> <li>6. Abergavenny &amp; District Civic Society</li> <li>7. SOUL (163), 2 Private Individuals</li> <li>8. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>9. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>10. 2 Private Individuals</li> <li>11. 2 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. 1 Private Individual</li> <li>14. 2 Private Individuals</li> <li>15. 3 Private Individuals</li> <li>16. 1 Private Individual</li> <li>17. 1 Private Individual</li> </ol> |
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	<p>13. Responders feel that the site should be mixed use offering an industrial estate/business park as Abergavenny is devoid of any purpose built facilities. <i>General objection to the site:</i></p> <p>14. Concern re landscape sensitivity. The site forms a significant proportion of the area A019 in a landscaping sensitivity report (Mar 2021). The area is classed in the highest sensitivity bracket.</p> <p>15. Concern re the impact of development on views from Abergavenny and Castle meadows and of the impact of light pollution on wildlife and biodiversity on The Little Skirrid and surrounding area.</p> <p>16. Concern re the slope of the site and the difficulties this will pose for development.</p> <p>17. Concern re run off water from the site and the potential risk of flooding this poses to the railway line.</p> <p>18. Concern re the potential increase in traffic and the ability of the road network to cope.</p> <p>19. Concern re lack of potential Active Travel solutions due to the railway line and A465 as well as the slope of the site.</p> <p>20. Concern whether the site would be connected to the main sewage system or would require it's own treatment plant.</p> <p>21. Concern re the power supply to the area being able to cope with new housing being all electric.</p> <p>22. General concerns re local services and employment being sufficient to cater for a site this size.</p>	<p>18. 3 Private Individuals 19. 1 Private Individual 20. 1 Private Individual 21. 1 Private Individual 22. 1 Private Individual</p>
<b>LPA Response</b>	<p>Comments noted. It is proposed to allocate the site as Strategic Allocation. The allocation is a sustainably located edge of settlement site, located on the eastern edge of Abergavenny, that provides the longer-term intention for further growth beyond the Plan period. The site performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability.</p>	
<b>LPA Recommendation</b>	<p>Retain Land to the East of Abergavenny East as a Strategic Allocation, with site specific policy requirements set out in Policy HA1 – Land to the East of Abergavenny.</p>	
<b>Chepstow</b>		
<b>Candidate Site: CS0165 Land at Mounon Road, Chepstow</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Agricultural use and potential features associated with the Roman road at the south of the site. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Chepstow Town Council support the site as long as development provides at least 50% affordable housing.</li> <li>3. Chepstow Town Council support for the site as development may provide employment opportunities.</li> <li>4. Responders feel that the site should not be supported without infrastructure improvements including provision of a bypass, improvements to Highbeech roundabout and an M48 link.</li> <li>5. Responders object as the site forms an essential part of the green wedge between Pwllmeyric and Chepstow.</li> <li>6. Responders object to the development of green field sites when there are brownfield sites in the county.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Chepstow Town Council</li> <li>3. Chepstow Town Council</li> <li>4. Cllr Louise Brown plus 3 Private Individuals</li> </ol>

7. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors.	5. Mathern Community Council Cllr Louise Brown plus 4 Private Individuals
8. Responders feel that development of the site will have a visual impact on the nearby AONB and on the listed building adjacent to the site.	6. 2 Private Individuals
9. Concerns for the surrounding green spaces, used extensively by local people for leisure, and supports local, protected species such as deer, bats and birds of prey.	7. Mathern Community Council plus 7 Private Individuals
10. Responders state that the is on prime agricultural land which should not be developed.	8. 8 Private Individuals
11. Cllr Louise Brown states that the land should be reserved for potential roundabout improvements at Highbeech.	9. 8 Private Individuals
12. Concerns regarding the safety of a Proposed Balancing Lake for surface water drainage and concerns as to whether the sewage pumping facilities may be inadequate.	10. Mathern Community Council plus 3 Private Individuals
13. Responders feel there is a lack of detail in plans to provide new employment in the area. Workers currently employed in the area do not earn enough to be able to afford the properties being built.	11. Cllr Louise Brown
14. A responder comments that the plan suggests working from home will continue but evidence suggests people are returning to the workplace.	12. 2 Private Individuals
15. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues.	13. 2 Private Individuals
16. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution within Chepstow (contrary to Wellbeing of Future Generations Act).	14. 1 Private Individual
17. Development in Gloucestershire, and the wider community, will impact traffic levels in Chepstow and demand for services.	15. Mathern Community Council Cllr Louise Brown plus 22 Private Individuals
18. A responder feels that access to the site will be challenging and require extensive remodelling of the Highbeech area.	16. Mathern Community Council plus 10 Private Individuals
19. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema.	17. 3 Private Individuals
20. Responders feel that the site is far from the town centre, and areas of local employment, and this along with the steep hills will encourage use of the car.	18. 1 Private Individual
21. Responders feel that public transport is insufficient. This site is too far from the railway station and the hills too steep to encourage use of the train, thereby encouraging use of the car.	19. Mathern Community Council Cllr Louise Brown plus 15 Private Individuals
22. Concerns that there is no provision for safe walking and Active Travel routes.	20. 6 Private Individuals
23. Responders feel that little affordable/social housing has been provided and no evidence of any Section 106 funds relieving any of the underlying problems. Any housing built here should be affordable for the local community who work locally.	21. 7 Private individuals
24. Concerns regarding lack of provision of formal and informal open spaces and Green Infrastructure onsite.	22. 3 Private Individuals
25. Concerns that congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping.	23. Mathern Community Council plus 2 Private Individuals
26. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community, and, with commuters bringing no benefit to local shops.	24. 3 Private Individuals
27. Criticism of the LDP process - no consultation on candidate sites for protection, CS0165 assessed as most favourable but not selected as the preferred site.	25. 2 Private Individuals
	26. 3 Private Individuals
	27. 6 Private Individuals
	28. 1 Private Individual

	<p>28. Responders state that the plan claims houses will be built as net carbon zero ready, however, no recent developments have been built to the high environmental standards we can now achieve.</p> <p>29. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity.</p> <p>30. Concerns regarding contravention of UK Gov Policy, National Planning Policy and Localism Act - All residents of the affected areas will have a direct legal case for increased health risks.</p> <p>31. Concern that growth proposed by MCC is in conflict with WG's in terms of the number of houses advised to match job creation/growth. Growth figures exceed advice by 40%.</p>	<p>29. 1 Private Individual</p> <p>30. 4 Private Individuals</p> <p>31. 2 Private Individuals</p>
<b>LPA Response</b>	<p>Comments noted. It is proposed to allocate the site as a Strategic Allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site that performs well against the site search sequence, with no significant constraints identified on site. The integration of the site with the existing settlement is a key principle with connection links forming a key policy requirement of the site's allocation. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. The mixed-use development proposal, which includes a care home and hotel, is considered to have associated job creation and tourism benefits, with opportunities to work and live together and promote accessibility and connectivity to the existing settlement.</p>	
<b>LPA Recommendation</b>	<p>Include Land at Mounton Road, Chepstow as a Strategic Allocation, with site specific policy requirements set out in Policy HA3 – Land at Mounton Road, Chepstow.</p>	
<b>Monmouth</b>		
<b>Candidate Site: CS0270 Leasbrook (Land north of Dixton Road)</b>		Representor:
	No responses received	
<b>LPA Response</b>	<p>It is proposed to allocate the site as a Strategic Allocation for approximately 270 homes. The allocation is a sustainably located edge of settlement site, north of Dixton Road. The site performs well against the site search sequence, with excellent links to the comprehensive school, facilities in the town centre and surrounding infrastructure. The site offers the opportunity to create an exemplar residential and GI-led development in a gateway location on the entrance to Monmouth. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.</p>	
<b>LPA Recommendation</b>	<p>Include Land at Leasbrook, Monmouth as a Strategic Allocation, with site specific policy requirements set out in Policy HA4 – Land at Leasbrook, Monmouth.</p>	



## Severnside

### Candidate Site: CS0087 Showground, Caldicot

Representor:

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| <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to the LDP and pre-planning consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; additionally a Heritage Impact Assessment and to consult Cadw regarding any impact on the Scheduled Monuments nearby; our understanding of the site has not changed since then, and recommendation remains the same.</li> <li>2. Responders concerned re flood risk (surface water and river) on site as the site is in a flood zone, and whether the proposed developments will make the issue worse or that the site is suitable for development at all. The runoff from the site causes issues with roads and properties nearby, concerns that this will increase with development. Concerns that an on-site sewage treatment plant is not feasible on the site, the discharge of treated effluent could not be made to watercourse due to distance, and other treatment methods would not be appropriate due to the land area required to comply with building regulations. A site-specific flood modelling exercise should be undertaken as existing flood mapping does not seem to be consistent with current events. SuDS would need to be carefully considered and built into high-level development proposals. Concerns re the capacity of the current water supply, sewerage and drainage systems, and their ability to cope with an increase in residential units. Will the increased sewage outflow have an impact on the Severn SAC / SPA? Concerns that the development will increase the phosphate issue.</li> <li>3. Enquiries re the use of S106 funds to support a River Restoration Options Report for the lower 3km of the Nedern. Responders require clear evidence of where S106 money will be invested upfront and also evidenced on delivery.</li> <li>4. Responder and site promoters, Richborough Estates are positive about the progression of the site into Stage 3A Candidate Site Assessment, and its suitability for residential development. They note that the site is not subject to any fundamental constraints that cannot be mitigated. The responders also note that an FCA will be submitted in support of any future planning application, demonstrating that the site can be brought forward. An initial masterplan demonstrates that no built development is proposed on the areas within Flood Zones 2/3, and that an appropriate sustainable drainage strategy would result in a downstream benefit through a reduction in peak flow run-off from the development. The initial masterplan also demonstrates that there will be no development in areas of SSSI. The responders strongly maintain that the Showground site is suitable for residential development.</li> <li>5. Concerns re NHS services and a lack of health infrastructure, such as Doctors, GPs, and Dentists, struggling to meet the current demands, inducing long wait times for appointments and that a large development on this site would only exacerbate the current issues. Responders also concerned that no provisions have been made to deal with the increased demand for these services brought about by development on the site, such as a sufficient number of health job posts filled. Pharmacies and hospitals are also being overwhelmed. Responders concerned that there are no places in both the local Primary and Secondary</li> </ol> | <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Portskewett Community Council plus 17 Private Individuals</li> <li>3. 2 Private Individuals</li> <li>4. Richborough Estates</li> <li>5. Portskewett Community Council plus 21 Private Individual</li> <li>6. Portskewett Community Council plus 23 Private Individuals</li> <li>7. 5 Private Individuals</li> <li>8. Portskewett Community Council plus 15 Private Individuals</li> <li>9. 13 Private Individuals</li> <li>10. Portskewett Community Council 13 Private Individuals</li> <li>11. 6 Private Individuals</li> <li>12. Portskewett Community Council plus 4 Private Individuals</li> <li>13. 6 Private Individuals</li> <li>14. 5 Private Individuals</li> <li>15. 1 Private Individual</li> </ol> |
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	<p>schools for existing residents, not including the new residents from developments on the site. Concerns re Telephone and Broadband services being able to keep up with current and future demands after the site has been developed.</p> <p>6. Concerns re the site location and the increase in vehicle movement in the area once it's been developed. Concerns re the lack of pedestrian links from the site to Caldicot. Concerns that existing road infrastructure is not sufficient for existing volume of vehicles, with large volumes of traffic and long queues, let alone the vast increase after development has been complete. A "do-nothing" approach is not acceptable in Chepstow – The development on the site will increase traffic at High Beech subsequently increasing air pollution. Concerns that essential improvements to road infrastructure will not be completed by 2033. Responders concerned about traffic moving into smaller local lanes to find alternative routes, resulting in dangerous driving and the overuse of roads that are not meant to cope with that volume of traffic. Concerns that commuting will increase due to the developments on the site and the lack of local links prompts people to choose their cars over other modes of transport. Concerns re the lack of pavements in the areas surrounding the site. Noise pollution will also see a dramatic increase with development of the site reducing the quality of life and health conditions. Responders believe there is a need for a reduction in speed through Crick to 30mph. Concerns re a lack of safe crossing points to important zones such as school pick up and drop off points. Concerns regarding the route taken by construction traffic and its safety. Concerns re a lack of pedestrian links. Concerns re the quality of the roads in the area and an increase in volume of traffic will only deteriorate them further. Responders concerned over the lack of road infrastructure improvements made, compared to the volume of developments completed. Concerns over poor traffic movement due to 20mph speed limits and the increase of traffic in other areas in order to avoid the imposition.</p> <p>7. Concerns that area is being developed to facilitate commuters, creating a suburb of Bristol, Newport, and Cardiff, capitalising on the proximity to the Severn crossing now that the tolls have been removed.</p> <p>8. Concerns re town centre and its state of deterioration, many shops are empty, and the main street is not a very nice place to walk at night - therefore it is not suitable to support the needs of the existing community, which will only be amplified by the development of this site. Responders concerned as there are zero real plans for infrastructure and amenity improvement. Public transport services in the area are not sufficient – bus service is limited and does not support commuting, lack of accessibility to the nearest train station with inadequate parking facilities, and no provisions have been provided for safe walking and cycling routes. Concerns re a lack of facilities for young people such as children's playparks, youth centres. Caldicot leisure centre was due to be upgraded but has not happened. Responders believe the infrastructure and amenities to support such developments on the site should be addressed first. Responders concerned that development of the site removes an important recreation and tourist facility, which not only boosts the local economy but is one of the sole reasons people visit Caldicot.</p> <p>9. Responders concerned re classification of the site as brownfield when the majority of the land is greenspace and could be classed as agricultural due to its uses, which will be lost after development. Responders note that the ecology of the natural environment should be protected for current and future generations. Concern re the finished site's ability to increase biodiversity in the area and that the development will cause habitat loss, increasing pressure on other areas of SSSI such as Nedern Wetland, due to increased human activity. Responders note that interruption to the Nedern Brook green corridor, and adverse effects on the landscape surrounding Caldicot Castle, including views in and out, would be undesirable and should be avoided.</p>	<p>16. 1 Private Individual</p> <p>17. 1 Private Individual</p> <p>18. 1 Private Individual</p> <p>19. Edenstone</p> <p>20. Taylor Wimpey PLC (Savills)</p> <p>21. Taylor Wimpey PLC (Savills)</p>
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10. Concerns re the size of the development and its location in relation to Caldicot, making the site appear like a new village. Concerns re size of development being too large when compared to other recent developments in the local area. The impacts of the developments scale would mean that local villages would be subsumed by Caldicot, impacting the local character and appearance of the area, removing their historic identity. Concerns re the number of developments in the local area surrounding the site and the proximity those developments to each other, noting the area to be overdeveloped. Responders note the volume of housing proposed for the site and believe the distribution is disproportionate to the rest of Monmouthshire, changing the dynamic of the surrounding area.
11. Concerns re the volume of social housing concentrated in Caldicot because of the development of this site and therefore the separation of people from the areas in which their families live. Concerns regarding the ability to fulfil affordable housing targets and that developers are allowed to build for profit, catering towards 4/5-bedroom homes for professional middle-aged people, and not for local young people. Concerns that the developments will be marketed towards those mainly from the Bristol area and won't be affordable for locals, noting that the average salary is much higher in Bristol than Monmouthshire. Responders desire a positive help to buy scheme for young locals. Responders note that the removal of the bridge tolls did not help young people to buy homes as the average house price in the area increased and that the Redrow Sudbrook development did not meet its affordable housing targets, suggesting that affordable housing should be allocated away from the Severnside area.
12. Concerns re limited employment opportunities in the area, especially for those without transport. Responders note that those who gain work in employment opportunities provided in the local area will not be able to afford to live in the areas being developed.
13. Responders concerned re change in use of the site as it currently promotes the local area and brings people to the town. Responders note that a key criterion for developing the candidate sites is tourism and that the current site's use provides a significant tourism element to the local economy as it hosts local, regional, national, and international level events throughout the year. Concerns re maintaining the area as country site and that attractions such as David Broom's Centre on the site, supports shops and food outlets providing local employment, which will be removed if developed. The Castle provides a brilliant venue for concerts, gatherings etc, which will be sat in the middle of a housing estate when the development is completed. Responders note that if this site is developed then it will lose its unique equine interest and business that it brings to the area. The visual proximity of the development to Caldicot Castle Country Park creates a negative heritage and wellbeing impact. Concerns that the development does not protect the landscape and heritage that makes Monmouthshire unique, special and an attractive place to live or help in sustaining rural communities.
14. Responders believe that the council's approach to Climate change is unsatisfactory and believe the high quality of environmental standards promised by developments will not be met, noting that the term "net zero ready homes" does not actually mean anything. Concerns that provisions made by the council towards the net zero goals will not prevent the detrimental impact this development will have on the surrounding area. Responders concerned that the allocation of this semi-rural site for development is in complete disregard to Monmouthshire's desires to cut commuting to work for environmental purposes. Concerns that this style of development is that of housing estates from the 70s and does not respect the environment.

15. Responder believes there is a lack of trust between the council and the communities it serves as the council continues to ignore their comments and not communicate effectively, therefore the community will continue to object to these kinds of proposals.
16. Responder believes the plan contradicts itself as so much development has been proposed for Monmouthshire, yet it admits it is not in the national growth area identified in Future Wales 2040.
17. Responder notes that CS0251 Land at Bradbury Farm is to come forward in tandem with this site to proceed. Concerns re who is going to control the process and the risk involved, such as the Land at Bradbury Farm being developed but developers for this site changing their mind, or the landowner pulling out as it is a family run business, therefore producing a situation against Welsh Government Guidelines by building in open countryside.
18. Responder notes that the increased volume of new developments encouraging those from Bristol to move and commute, reduces the amount of local youngster, further contributing to a dilution of those who have an interest in speaking Welsh, which needs support if it is to survive in Monmouthshire.
19. Promoter for site CS0206, Edenstone, believe their site (Land South of Newport Road, Magor) best contributes to the vision and objectives of the RLDP and the achievement of sustainable development within the Severnside region when compared with CS0087 Showground for the below reasons.
  - The landscape of the Showground is more sensitive to residential development than that of the Land South of Newport Road, Magor.
  - Concerns that Showground land area is of predictive Grade 1 and 2 BMV, and that lower grade areas or non BMV, such as the Land South of Newport Road, Magor, should be considered in advance of BMV land.
  - Showground site is located a further walking distance away from the town centre than Land South of Newport Road, Magor is from Magor Centre. Time taken to walk from the Showground site to the town centre is greater than 20 minutes and over 30 minutes to the train station, therefore not meeting the council's aspirations for 20-minute neighbourhoods.
  - Concerns that the Showground site includes areas of flood risk.
  - Concerns that Caldicot East has the potential to impact upon Caldicot Conservation Area and Caldicot Castle Grade I Listed Building and Scheduled Monument, whereas Land South of Newport Road is free from any heritage constraints.
20. Promoter for site CS0253 and CS0254, Taylor Wimpey PLC (Savills), compares the performance of their site (Ifton Manor Farm, Site A and B), against CS0087 Showground, Caldicot (Caldicot East). Taylor Wimpey believe the Ifton Manor Farm site performs more strongly than the Caldicot East site for the following reasons.
  - Ifton Manor Farm site performs better in the Integrated Sustainability Appraisal than the Caldicot East Site.
  - Ifton Manor Farm site is more favourable in its ability to capitalise on Sustainable Transport Infrastructure and encourage modal shift.
  - Ifton Manor Farm performs better in 9, the same in 8 and worse in 1, when compared to the Caldicot East site, out of the objectives set out in the current Preferred Strategy to provide a useful framework to assess the performance of Strategic Growth Options.
  - Believes the proposed number of houses to be delivered within a set time frame for the Caldicot East site is unrealistic, due to reason such as securing planning permission, marketing the site, creation of new infrastructure to support the development and the rate of unit delivery seen in similar sites locally.

	21. Taylor Wimpey notes that the Preferred Strategy being consulted upon entirely fails to give due weight to the Integrated Sustainability Appraisal, therefore Taylor Wimpey notes the settlement to be unsound as the Caldicot East site was selected to proceed over Ifton Manor Farm.	
<b>LPA Response</b>	Comments noted. It is proposed to allocate the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. The site is partly a brownfield site as it includes an existing commercial equestrian centre that is relocating elsewhere. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	Retain Land to the East of Caldicot/North of Portskewett as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 – Land to the East of Caldicot/North of Portskewett.	
<b>Candidate Site: CS0251 Land at Bradbury Farm, Crick</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to LDP consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work: our understanding of the site has not changed since the and recommendation stays the same.</li> <li>2. Concerns re placemaking and its consideration of existing settlements, as building retail and leisure units on the site is likely to have an adverse effect on Caldicot town centre, where the focus should lie.</li> <li>3. Promoter for site CS0206, Edenstone, believe their site (Land South of Newport Road, Magor) best contributes to the vision and objectives of the RLDP and the achievement of sustainable development within the Severnside region when compared with CS0087 Showground for the below reasons. <ul style="list-style-type: none"> <li>• The landscape of the Showground is more sensitive to residential development than that of the Land South of Newport Road, Magor.</li> <li>• Concerns that Showground land area is of predictive Grade 1 and 2 BMV, and that lower grade areas or non BMV, such as the Land South of Newport Road, Magor, should be considered in advance of BMV land.</li> <li>• Showground site is located a further walking distance away from the town centre than Land South of Newport Road, Magor is from Magor Centre. Time taken to walk from the Showground site to the town centre is greater than 20 minutes and over 30 minutes to the train station, therefore not meeting the council’s aspirations for 20-minute neighbourhoods.</li> <li>• Concerns that the Showground site includes areas of flood risk.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. Edenstone</li> <li>4. Taylor Wimpey PLC (Savills)</li> <li>5. 1 Private Individual</li> <li>6. Portskewett Community Council plus 14 Private Individuals</li> <li>7. Portskewett Community Council plus 18 Private Individuals</li> <li>8. Portskewett Community Council plus 18 Private Individuals</li> <li>9. 5 Private Individuals</li> </ol>

<ul style="list-style-type: none"> <li>• Concerns that Caldicot East has the potential to impact upon Caldicot Conservation Area and Caldicot Castle Grade I Listed Building and Scheduled Monument, whereas Land South of Newport Road is free from any heritage constraints.</li> </ul> <p>4. Promoter for site CS0253 and CS0254, Taylor Wimpey PLC (Savills), compares the performance of their site (Ifton Manor Farm, Site A and B), against CS0087 Showground, Caldicot (Caldicot East). Taylor Wimpey believe the Ifton Manor Farm site performs more strongly than the Caldicot East site for the following reasons.</p> <ul style="list-style-type: none"> <li>• Ifton Manor Farm site performs better in the Integrated Sustainability Appraisal than the Caldicot East Site.</li> <li>• Ifton Manor Farm site is more favourable in its ability to capitalise on Sustainable Transport Infrastructure and encourage modal shift.</li> <li>• Ifton Manor Farm performs better in 9, the same in 8 and worse in 1, when compared to the Caldicot East site, out of the objectives set out in the current Preferred Strategy to provide a useful framework to assess the performance of Strategic Growth Options.</li> <li>• Believes the proposed number of houses to be delivered within a set time frame for the Caldicot East site is unrealistic, due to reason such as securing planning permission, marketing the site, creation of new infrastructure to support the development and the rate of unit delivery seen in similar sites locally.</li> <li>• Taylor Wimpey notes that the Preferred Strategy being consulted upon entirely fails to give due weight to the Integrated Sustainability Appraisal, therefore Taylor Wimpey notes the settlement to be unsound as the Caldicot East site was selected to proceed over Ifton Manor Farm.</li> </ul> <p>5. Responders require clear evidence of where S106 money will be invested upfront and also evidenced on delivery.</p> <p>6. Responders concerned re flood risk (surface water and river) on site as the site is in a flood zone, and whether the proposed developments will make the issue worse or that the site is suitable for development at all. The runoff from the site causes issues with roads and properties nearby, concerns that this will increase with development. Concerns that an on-site sewage treatment plant is not feasible on the site, the discharge of treated effluent could not be made to watercourse due to distance, and other treatment methods would not be appropriate due to the land area required to comply with building regulations. A site-specific flood modelling exercise should be undertaken as existing flood mapping does not seem to be consistent with current events. SuDS would need to be carefully considered and built into high-level development proposals. Concerns re the capacity of the current water supply, sewerage and drainage systems, and their ability to cope with an increase in residential units. Will the increased sewage outflow have an impact on the Severn SAC / SPA? Concerns that the development will increase the phosphate issue.</p> <p>7. Concerns re NHS services and a lack of health infrastructure, such as Doctors, GPs, and Dentists, struggling to meet the current demands, inducing long wait times for appointments and that a large development on this site would only exacerbate the current issues. Responders also concerned that no provisions have been made to deal with the increased demand for these services brought about by development on the site, such as a sufficient number of health job posts filled. Pharmacies and hospitals are also being overwhelmed. Responders concerned that there are no places in both the local Primary and Secondary schools for existing residents, not including the new residents from developments on the site. Concerns re Telephone and Broadband services being able to keep up with current and future demands after the site has been developed.</p> <p>8. Concerns re the site location and the increase in vehicle movement in the area once it's been developed. Concerns re the lack of pedestrian links from the site to Caldicot. Concerns that existing road infrastructure is not sufficient for existing volume of</p>	<p>10. Portskewett Community Council plus 14 Private Individuals</p> <p>11. 13 Private Individuals</p> <p>12. Portskewett Community Council plus 10 Private Individuals</p> <p>13. 5 Private Individuals</p> <p>14. Portskewett Community Council plus 3 Private Individuals</p> <p>15. 2 Private Individuals</p> <p>16. 4 Private Individuals</p> <p>17. 1 Private Individual</p> <p>18. 1 Private Individual</p> <p>19. 2 Private Individuals</p> <p>20. 1 Private Individual</p> <p>21. 1 Private Individual</p>
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vehicles, with large volumes of traffic and long queues, let alone the vast increase after development has been complete. A “do-nothing” approach is not acceptable in Chepstow – The development on the site will increase traffic at High Beech subsequently increasing air pollution. Concerns that essential improvements to road infrastructure will not be completed by 2033. Responders concerned about traffic moving into smaller local lanes to find alternative routes, resulting in dangerous driving and the overuse of roads that are not meant to cope with that volume of traffic. Concerns that commuting will increase due to the developments on the site and the lack of local links prompts people to choose their cars over other modes of transport. Concerns re the lack of pavements in the areas surrounding the site. Noise pollution will also see a dramatic increase with development of the site reducing the quality of life and health conditions. Responders believe there is a need for a reduction in speed through Crick to 30mph. Concerns re a lack of safe crossing points to important zones such as school pick up and drop off points. Concerns regarding the route taken by construction traffic and its safety. Concerns re a lack of pedestrian links. Concerns re the quality of the roads in the area and an increase in volume of traffic will only deteriorate them further. Responders concerned over the lack of road infrastructure improvements made, compared to the volume of developments completed. Concerns over poor traffic movement due to 20mph speed limits and the increase of traffic in other areas in order to avoid the imposition.

9. Concerns that area is being developed to facilitate commuters, creating a suburb of Bristol, Newport, and Cardiff, capitalising on the proximity to the Severn crossing now that the tolls have been removed.
10. Concerns re town centre and its state of deterioration, many shops are empty, and the main street is not a very nice place to walk at night - therefore it is not suitable to support the needs of the existing community, which will only be amplified by the development of this site. Responders concerned as there are zero real plans for infrastructure and amenity improvement. Public transport services in the area are not sufficient – bus service is limited and does not support commuting, lack of accessibility to the nearest train station with inadequate parking facilities, and no provisions have been provided for safe walking and cycling routes. Concerns re a lack of facilities for young people such as children’s playparks, youth centres. Caldicot leisure centre was due to be upgraded but has not happened. Responders believe the infrastructure and amenities to support such developments on the site should be addressed first. Responders concerned that development of the site removes an important recreation and tourist facility, which not only boosts the local economy but is one of the sole reasons people visit Caldicot.
11. Responders concerned re classification of the site as brownfield when the majority of the land is greenspace and could be classed as agricultural due to its uses, which will be lost after development. Responders note that the ecology of the natural environment should be protected for current and future generations. Concern re the finished site’s ability to increase biodiversity in the area and that the development will cause habitat loss, increasing pressure on other areas of SSSI such as Nedern Wetland, due to increased human activity. Responders note that interruption to the Nedern Brook green corridor, and adverse effects on the landscape surrounding Caldicot Castle, including views in and out, would be undesirable and should be avoided.
12. Concerns re the size of the development and its location in relation to Caldicot, making the site appear like a new village. Concerns re size of development being too large when compared to other recent developments in the local area. The impacts of the developments scale would mean that local villages would be subsumed by Caldicot, impacting the local character and appearance of the area, removing their historic identity. Concerns re the number of developments in the local area surrounding the site and the proximity those developments to each other, noting the area to be overdeveloped and urbanised.

- Responders note the volume of housing proposed for the site and believe the distribution is disproportionate to the rest of Monmouthshire, changing the dynamic of the surrounding area.
13. Concerns re the volume of social housing concentrated in Caldicot because of the development of this site and therefore the separation of people from the areas in which their families live. Concerns regarding the ability to fulfil affordable housing targets and that developers are allowed to build for profit, catering towards 4/5-bedroom homes for professional middle-aged people, and not for local young people. Concerns that the developments will be marketed towards those mainly from the Bristol area and won't be affordable for locals, noting that the average salary is much higher in Bristol than Monmouthshire. Responders desire a positive help to buy scheme for young locals. Responders note that the removal of the bridge tolls did not help young people to buy homes as the average house price in the area increased and that the Redrow Sudbrook development did not meet its affordable housing targets, suggesting that affordable housing should be allocated away from the Severnside area.
  14. Concerns re limited employment opportunities in the area, especially for those without transport. Responders note that those who gain work in employment opportunities provided in the local area will not be able to afford to live in the areas being developed.
  15. Responders concerned re change in use of the site as it currently promotes the local area and brings people to the town. Responders note that a key criterion for developing the candidate sites is tourism and that the current site's use provides a significant tourism element to the local economy as it hosts local, regional, national, and international level events throughout the year. Concerns re maintaining the area as country site and that attractions such as David Broom's Centre on the site, supports shops and food outlets providing local employment, which will be removed if developed. The Castle provides a brilliant venue for concerts, gatherings etc, which will be sat in the middle of a housing estate when the development is completed. Responders note that if this site is developed then it will lose its unique equine interest and business that it brings to the area. The visual proximity of the development to Caldicot Castle Country Park creates a negative heritage and wellbeing impact. Concerns that the development does not protect the landscape and heritage that makes Monmouthshire unique, special and an attractive place to live or help in sustaining rural communities.
  16. Responders believe that the council's approach to Climate change is unsatisfactory and believe the high quality of environmental standards promised by developments will not be met, noting that the term "net zero ready homes" does not actually mean anything. Concerns that provisions made by the council towards the net zero goals will not prevent the detrimental impact this development will have on the surrounding area. Responders concerned that the allocation of this semi-rural site for development is in complete disregard to Monmouthshire's desires to cut commuting to work for environmental purposes. Concerns that this style of development is that of housing estates from the 70s and does not respect the environment.
  17. Responder believes there is a lack of trust between the council and the communities it serves as the council continues to ignore their comments and not communicate effectively, therefore the community will continue to object to these kinds of proposals.
  18. Responder believes the plan contradicts itself as so much development has been proposed for Monmouthshire, yet it admits it is not in the national growth area identified in Future Wales 2040.
  19. Responders note that the site is located in open countryside and only connects to Caldicot via a flood zone, both criteria for ruling out sites for allocation.



	<p>20. Responder notes that there are areas that would make more sense, such as the fields over the road from the site behind the main road in Portskewett, that are owned by the council.</p> <p>21. Responder in partial support but concerned re landscape impact east, land levels, over reliance on cars as too far from Caldicot and the site being nearer to M48 Chepstow junction than Severn Tunnel junction. Responder notes that the extent of CS0251 goes beyond the strategic extent identified and believes the site should be pulled back and reduced.</p>	
<b>LPA Response</b>	<p>Comments noted. It is proposed to allocate part of the site as part of a wider Strategic Allocation for approximately 770 homes. The allocation is a sustainably located edge of settlement site and will extend the settlement of Caldicot to the north-east, adjacent to the Crick Road, Portskewett site. The site performs well against the site search sequence, with good links to a shop, open space and employment uses with facilities in the town centre just over a 20 minute walk. These links will be strengthened via the provision of active travel links throughout the site. While the site has good links to a nearby primary school, a new primary school will be provided on the site to assist with capacity issues in the area and provide benefits to the wider community. While the site is located in close proximity to heritage designations, no significant constraints are identified on the site. The site is also in close proximity to a SSSI. No built development will take place on these sensitive areas, with the area to the west of the former railway to be designated as an Area of Amenity Importance to provide additional protection. The site offers the opportunity to create an exemplar residential-led mixed-use development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.</p> <p>6ha of the northern part of the originally submitted Candidate Site has been included as a separate B1, B2, B8 allocated employment site namely EA1e Land adjoining Oak Grove Farm, Caldicot.</p> <p>A gypsy and traveller site is included within the red line boundary of the originally submitted Candidate Site and has been assessed as part of a different process.</p>	
<b>LPA Recommendation</b>	Retain Land to the East of Caldicot/North of Portskewett as a Strategic Allocation, with site specific policy requirements set out in Policy HA2 – Land to the East of Caldicot/North of Portskewett.	

## Primary Settlements

### Abergavenny & Llanfoist

#### Candidate Site: CS0056 South Brecon Road, Abergavenny

Responder:

1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber - Adjacent to the route of a Roman Road, development could be mitigated by condition, in accordance with an agreed written scheme of Historic Environment Mitigation.
2. Concerns were raised by several responders that the site's western and southern boundaries are not effectively screened and the site is exposed to views from the National Park.

1. Glamorgan Gwent Archaeological Trust Ltd
2. Abergavenny Town Council, Abergavenny & District Civic Society

	<ol style="list-style-type: none"> <li>3. Several responders feel the site should be included in the policy for a Green Wedge buffer between the built-up area and the National Park.</li> <li>4. Traffic issues were raised with concerns that the existing road network would not cope with the increase in traffic and that a new junction may be required to access the A40.</li> <li>5. A responder states that the site is grade 2 agricultural land.</li> <li>6. A responder was concerned that the site would be isolated from the town by the A40 and might never form a natural part of the town active travel network.</li> <li>7. Support for the size and location of the site. Hopeful that it can come forward sooner and provide much needed affordable homes.</li> </ol>	<ol style="list-style-type: none"> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>5. Abergavenny &amp; District Civic Society</li> <li>6. Abergavenny Transition Town</li> <li>7. Private Individual x 1</li> </ol>
<b>LPA Response</b>	<p>Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact concerns have also been raised in relation to the site’s allocation. In addition, the site is identified as a Green Wedge as part of the Green Wedge Assessment which has been undertaken to support the RLDP.</p>	
<b>LPA Recommendation</b>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<b>Candidate Site: CS0094 Penlanlas Farm, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Concerns were raised by several responders regarding the slope of the site, and its prominence in views from the east, and the lack of green infrastructure to help it blend into the landscape.</li> <li>2. Traffic issues were raised with concerns that increased traffic on Old Hereford Road would further overload Pen y Pound and its junction with the A40.</li> <li>3. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and of the town centre by foot, therefore, requiring a frequent bus service / increased use of the car.</li> <li>4. There is concern that allowing this site would set a precedent for other sites in the area.</li> <li>5. Support for the allocation of Land at Penlanlas Farm in the RLDP Candidate Sites Register.</li> <li>6. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.</li> </ol>	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic</li> </ol>

		<p>Society, Abergavenny Transition Town</p> <p>5. Edenstone Homes</p> <p>6. Glamorgan Gwent Archaeological Trust Ltd</p>
<b>LPA Response</b>	<p>Comments noted. Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also benefits from good access to a range of services including schools and open space. A significant proportion of the site is also identified as being non-BMV land (63%), which performs well in a Monmouthshire context. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability. It is therefore proposed to allocate the site for 100 dwellings.</p>	
<b>LPA Recommendation</b>	<p>It is proposed to allocate the site for 100 dwellings with site specific policy requirements set out in Policy HA5 Land at Penlanlas Farm, Abergavenny.</p>	
<b>Candidate Site: CS0108 North Hillgrove Avenue, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council state that the site is within CSP004, proposed Green Wedge between the built-up area and the National Park boundary at the highest part of the wedge.</li> <li>2. Abergavenny Town Council feel that while development of the site would align with development to the south, the average slope is about 1 in 8 which is much steeper than recently developed land to the east.</li> <li>3. No objection in principle from Abergavenny Transition Town &amp; Abergavenny &amp; District Society – whilst the site is in CSP004 as part of the Green Wedge it is now felt that the site is not essential to the purposes of the Green Wedge or its development unacceptable in the landscape. If development goes ahead the green wedge should be formally and legally defined to prevent an argument that this development site sets a precedent.</li> <li>4. Responders feel that a thick hedgerow on the western boundary should be safeguarded, as should mature trees within the site and on its eastern boundary.</li> <li>5. Responders state that the site may be Grade 3a agricultural land.</li> <li>6. Responders suggest that vehicular access should be via Bretherton Way and/or Hillgrove Avenue/Poplars Road (with protection of trees) to avoid reliance on access only via the persimmon estate which would mean both estates using a single connection to Hereford Road.</li> <li>7. A responder states that the site would be close to a Primary School and shops etc. The town centre is about 2.5kms away. Hereford Road has an hourly bus service but the new estate would need a service. Some active travel connectivity may be available via the Persimmon estate when it is completed.</li> <li>8. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.</li> <li>9. The site promotor, The Stantonbury Building and Development Company, submitted a Vision Document to support consideration of their proposal.</li> </ol>	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council</li> <li>2. Abergavenny Town Council</li> <li>3. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny &amp; District Civic Society, Abergavenny Town Council</li> <li>5. Abergavenny &amp; District Civic Society</li> <li>6. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>7. Abergavenny &amp; District Civic Society</li> <li>8. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>

		9. The Stantonbury Building and Development Company
<b>LPA Response</b>	Comments noted. Site is not progressing as the highway authority has raised significant concerns in relation to achieving suitable access arrangements. Landscape impact concerns have also been raised reflecting the lack of supporting information with the submission and the likely significant adverse visual impact on the Landscape Character Area. Overall, there are considered to be more suitable sites available in Abergavenny.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0128 Land at Chapel Farm, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - A linear parchmark is noted in the HER, this may be related to field boundaries remaining which are depicted in the Tithe of 1848.</li> <li>2. Responders state that the site is within CSP003 one of the proposed Green Wedge buffers between the built-up area and the National Park boundary and should be protected. Desire to retain the town's natural historic boundary with the National Park and keep the attractive setting of the Brecon Beacons, the town is famed for, intact.</li> <li>3. Concern that the site is prominent to views from the south towards Pentre Lane with no mitigating green infrastructure to help absorb it into the landscape.</li> <li>4. Site believed to be a SINCP and of very high ecological value supporting a high level of natural wildlife including birds of prey and mammals.</li> <li>5. Responders suggest that although the site may accommodate as many as 250 homes a much lower density would be necessary to reflect the character of adjoining development.</li> <li>6. Concern that Pentre Road (and surrounding roads) are very narrow lanes unsuitable for much vehicular traffic but popular for active travel and should be retained as such.</li> <li>7. Believed to be some liability to flood towards Pentre Road and fears this development could increase run-off flooding.</li> <li>8. Concerns that the connecting road network is inadequate to cope with a significant increase in traffic. This level of development would require a new direct access to the A40.</li> <li>9. Concerns that increase in traffic will cause queuing and affect air quality.</li> <li>10. Concerns regarding site access.</li> <li>11. Responders state that there are no local shops, town centre services are up to 2km away and only a two-hourly bus service. No extra jobs, schools or medical facilities are being proposed.</li> <li>12. The capacity of the local sewer network has been questioned and concerns regarding flooding caused by heavy rainfall.</li> <li>13. Believed to be Grade 3b agricultural land. Quality grazing land.</li> <li>14. Concerns that development at this site would set a precedent for other sites within CSP003.</li> <li>15. Responders state that Pentre Road and Pentre Lane provide valuable, accessible, amenity for the community: walking, cycling, riding. Hill walking corridor from Fairfield car park to several routes onto the Sugar Loaf, encouraging tourism.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, plus 103 Private Individuals</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, plus 17 Private Individuals</li> <li>4. 18 Private Individuals</li> <li>5. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>6. Abergavenny Town Council, Abergavenny &amp; District Civic Society plus 9 Private Individuals.</li> <li>7. Abergavenny Town Council, Abergavenny &amp; District Civic</li> </ol>

	<p>16. Responders state that the site provides a sense of tranquillity which is enjoyed by both locals and visitors, encouraging tourism, and benefiting health and wellbeing.</p> <p>17. Concern that the site contains The Pentre and is directly overlooked by Llwyndu Court, both listed buildings in their own special landscape settings.</p> <p>18. Concern that the site adjoins the Abergavenny Conservation Area.</p> <p>19. Responders state that Pentre Road forms the natural boundary to Abergavenny and development north of this road should not be allowed.</p> <p>20. Responders feel that brownfield sites, and empty buildings, should be developed before destroying the countryside.</p> <p>21. Abergavenny is already heavily developed; questioned whether the site is needed.</p> <p>22. General objection to development of this site.</p>	<p>Society, plus 2 Private Individuals.</p> <p>8. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, Plus 50 other Private Individuals.</p> <p>9. 8 Private Individuals.</p> <p>10. 17 Private Individuals.</p> <p>11. Abergavenny Town Council, Abergavenny &amp; District Civic Society, plus 12 Private Individuals</p> <p>12. Abergavenny Town Council, Abergavenny &amp; District Civic Society, plus 10 Private Individuals</p> <p>13. Abergavenny &amp; District Civic Society, plus 17 Private Individuals</p> <p>14. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</p> <p>15. 36 Private Individuals</p> <p>16. 18 Private Individuals</p> <p>17. 9 Private Individuals</p> <p>18. 12 Private Individuals</p> <p>19. 2 Private Individuals</p> <p>20. 2 Private Individuals</p> <p>21. 1 Private Individual</p> <p>22. 92 Private Individuals</p>
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as there are unresolved concerns regarding highways and access arrangements including flood risk to the south of the site onto Pentre Road and the suitability of the alternative access onto Pentre Lane. The whole site is also Grade 2 BMV agricultural land and there are more</p>	

	suitable alternatives site with lower grade agricultural land in Abergavenny. In addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, there are considered to be more suitable sites available in Abergavenny.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0161 Land north of Hillside, Abergavenny</b>		<b>Responder:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - Includes part of the Registered Park and Garden of The Hill PGW (Gt) 62(MON). Cadw must be consulted and a Heritage Impact Assessment undertaken.</li> <li>2. Several responders feel the site should be included in the policy for a Green Wedge buffer between the built-up area and the National Park.</li> <li>3. The site is wooded and several comments were received stating that the woodland is an important element of the town's green infrastructure and is prominent from the east.</li> <li>4. A suggestion was made that a small number of homes, similar to those in the grounds of The Hill, might acceptable within the less wooded western portion of the site which falls within the Abergavenny Conservation Area.</li> <li>5. Traffic issues were raised with concerns that increased traffic on Old Hereford Road would further overload Pen y Pound and its junction with the A40. It was also stated that Deri Road should not be used for access to any development.</li> <li>6. Responders felt that the building of the King Henry 8 school has increased traffic excessively and that school children are at risk whilst using the narrow footpath.</li> <li>7. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and the town centre by foot, therefore, requiring a frequent bus service.</li> <li>8. A responder feels that this is not a suitable site for residential development and that there is a better site within the candidate site list.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>5. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>8. Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing due to concerns raised by CADW in relation to the western part of candidate site being inside the boundaries of The Hill registered historic park and garden, with the rest of the area being an essential part of its setting. Concerns have also been raised in relation to the ecological impact development would have. In addition, the site is identified as a Green Wedge following the Green Wedge Assessment. Overall, it is considered that the desired levels of growth can be accommodated on less sensitive sites within the area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0164 Land adjacent to Red Barn Farm (RBF1)	Responder:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Adjacent to the route of a Roman Road, previously recommended condition for written scheme of investigation for archaeological watching brief.</li> <li>2. Abergavenny Town Council object as the site falls within CSP002.</li> <li>3. Several responders state that the National Park buffer zone proposal could allow for a trunk road by-pass, however, this is now unlikely due to WG policies.</li> <li>4. Abergavenny &amp; District Civic Society and Abergavenny Transition Town support the site if it is needed in this plan and if Abergavenny East site is unviable.</li> <li>5. A responder states that the site is Grade 3a agricultural land.</li> <li>6. Responders state the site is close to the National Park boundary but visually separated from it by a belt of woodland.</li> <li>7. Responders state that flood risk from mountain streams may reduce the potential number of dwellings; potentially 60 homes but half that if a road line had to be safeguarded. Site is on an active floodplain.</li> <li>8. Responders state that a new access to the A40 would be needed; perhaps shared with a new hospital access.</li> <li>9. Abergavenny Transition town wants the spinney between the two sites retained for an active travel route.</li> <li>10. Concerns that traffic will increase on road which are already at capacity.</li> <li>11. Concerns that there is a shortage of doctors, dentists and school places within Abergavenny.</li> <li>12. Concerns regarding a lack of employment in the area; houses should be built where there are employment opportunities.</li> <li>13. Abergavenny Transition town suggests that any housing ought to be prioritised for allocation to hospital staff to reduce in-commuting.</li> <li>14. Concern that access to the site is difficult and would require the removal of hedgerows. Responders state that the hedgerow along the A40 should be retained.</li> <li>15. A responder states that the site is part of the river Usk SAC; it is presently open fields, with a rural feel, and provides natural habitat for bats, hedgehogs, voles and many other protected species.</li> <li>16. The site falls within the Neville Hall RIGS and comprises three components: Neville Hall moraine feature and section, cemented outwash gravel section, post-glacial abandoned river channels and scroll marks on floodplain. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.</li> <li>17. A responder states that the site is adjacent to Red Barn Farm listed buildings and forms part of its unique setting or curtilage.</li> <li>18. Concerns that development would cause noise and light pollution to surrounding protected areas.</li> <li>19. Concerns re increased pollution into the river Usk and Nant Iago stream.</li> <li>20. Concerns re detriment to visual amenity for residents and tourists as well as loss of privacy for residents living next to the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>5. Abergavenny &amp; District Civic Society</li> <li>6. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>7. Abergavenny Town Council, Abergavenny &amp; District Civic Society plus 1 Private Individual</li> <li>8. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>9. Abergavenny Transition Town</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> <li>12. 1 Private Individual</li> <li>13. Abergavenny Transition Town</li> <li>14. Abergavenny Town Council, Abergavenny &amp; District Civic</li> </ol>

		<p>Society, Abergavenny Transition Town plus 1 Private Individual 15. 1 Private Individual 16. SEWRIGS group 1 Private Individual 17. 1 Private Individual 18. 1 Private Individual 19. 1 Private Individual 20. 1 Private Individual</p>
<b>LPA Response</b>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site is also wholly grade 2 BMV agricultural land and there are more suitable alternatives site with lower grade agricultural land in Abergavenny. Concerns have also been raised in relation to the impact on the setting of the listed building.</p>	
<b>LPA Recommendation</b>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<b>Candidate Site: CS0174 Nantgavenny Lane, Abergavenny</b>		<b>Responder:</b>
	<ol style="list-style-type: none"> <li>1. The site is within CSP001 the proposed Green Wedge to protect the lower sides of the Gavenny Valley from further development. The Gavenny Valley should be protected as a vital publicly accessible green lung.</li> <li>2. Concerns that the steeply sloping wooded lower part of the site is a SINC and partly liable to flood.</li> <li>3. Concerns regarding the impact of housing on landscape value, the wildlife interest and the river quality.</li> <li>4. Responder states that the site is Grade 3a agricultural land.</li> </ol>	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny &amp; District Civic Society</li> </ol>
<b>LPA Response</b>	<p>Comments noted. Viability Assessment not submitted to support proposal. The site was therefore not assessed as part of Stage 3A/3B and has not progressed further in the candidate site assessment process.</p>	
<b>LPA Recommendation</b>	<p>This site will not be allocated in the Deposit RLDP.</p>	



<b>Candidate Site: CS0178 Abergavenny Workhouse</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Built 1837-9 as a Workhouse, some alteration and restoration, any change will need mitigation; building recording and potentially archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Responders suggest that the present designation as a protected employment site should be maintained particularly for its wide variety of different building volumes and types.</li> <li>3. Responders suggest that although only one building is listed, the complex of Victorian workhouse buildings has considerable architectural and historic qualities that would benefit from tidying up.</li> <li>4. Concern regarding CS0178 and CS0286 appearing the same, apart from residential being included in CS0286. Clarification wanted whether the schemes include any demolition.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0185 West of Glebe Cottage, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Potential Medieval settlement and land use; desk-based assessment undertaken; archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Conditional acceptance by Abergavenny Town Council and Abergavenny &amp; District Civic Society – The site lies within CSP001 proposed Green Wedge to protect the attractive and wildlife rich lower sides of the Gavenny Valley from development. It is also within the setting of St Teilo's Church, a Grade 1 Listed Building.</li> <li>3. In 2018 Abergavenny &amp; District Civic Society objected to an application for housing on the site. Following considerable modification, the application (for 12 affordable homes) was approved but is on hold due to drainage issues. We can now accept development here provided that the design and purpose of the housing are little changed.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny Transition Town</li> </ol>

	4. Abergavenny Transition Town state that the Gavenny Valley should be protected as a vital publicly accessible piece of green infrastructure, a green lung from the centre of town out to the open countryside along the river that gave the town its name.	
<b>LPA Response</b>	Comments noted. Site not progressing via the RLDP process as insufficient information has been submitted in relation to the candidate site submission. Therefore, the site will not be allocated in the RLDP. It is noted however, that planning application DM/2018/00834 for a rural exceptions site for 12 affordable dwellings is pending consideration following the Welsh Government decision to not call in the application for determination by the Welsh Ministers.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0192 Old Hereford Road, Abergavenny</b>		<b>Responder:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. Responders state that the site is within CSP004 the proposed well-defined Green Wedge buffer between the built-up area and the National Park boundary. It lies at the highest part of the Wedge and is particularly prominent in views from the east.</li> <li>3. Concerns regarding increased traffic on Old Hereford Road which further overload Pen y Pound and it's junction with the A40.</li> <li>4. Concerns that the slope of the site would make substantial Active Travel unlikely and would limit the accessibility of local shops and the town centre.</li> <li>5. Responders state that a frequent bus service would be essential.</li> <li>6. The site sponsor, Candleston Homes, has submitted extensive information in support of the site, and includes the following points: <ul style="list-style-type: none"> <li>• The site is in Flood Zone 1 for both Rivers and Sea, and, surface water flooding; therefore there is no reason why the site cannot be developed from a flood risk.</li> <li>• Landscape and Green Infrastructure assessments conclude that the site is suitable for development with appropriate mitigation.</li> <li>• A high pressure gas main crosses the site which affects the site's capacity but not it's overall suitability.</li> <li>• The site is sustainably located and is proximate to a range of services and well served by existing active travel routes and public transport.</li> <li>• The Site Ecology Assessment concludes the site is considered to have 'Medium' value and would be suitable for development.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, 1 Private Individual</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>5. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>6. Candleston Homes</li> </ol>
<b>LPA Response</b>	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Abergavenny to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0220 Ross Road, Abergavenny	Responder:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Area includes a Water Mill, probably of Medieval origin, part of Mardy Park, also potentially of Medieval origin and prehistoric artefacts noted.</li> <li>2. Object – the site is the key section of CSP001 protecting the Gavenny Valley between the built-up area and the railway/A465 from further development.</li> <li>3. Concern that part of the site is a SINC and liable to flood. These flood plains help protect the town from flooding further downstream. Further concerns are that developing this steeply sloping site would further increase the risk of flood during periods of heavy rain fall.</li> <li>4. An ancient woodland SSSI is astride the site north of Ross Road forming an east-west wildlife corridor that continues east of A465. Many TPOs believed to be present. Undisturbed landscape and wildlife qualities of CSP001 would be lost. This is a vital, publicly accessible green lung from the town centre to the open countryside used as amenity land by local residents and organised groups.</li> <li>5. Responders state that the river Gavenny which runs through the site has a healthy population of White Clawed Crayfish - protected under the Wildlife and Countryside Act 1981 / listed as endangered on the global IUCN Red List of Threatened Species and must be protected.</li> <li>6. Responders state that the MCC Ecological Site Assessment, undertaken on this site during preparation of the previous plan, identified that the bio-diversity constraints were enough to recommend that development of a large proportion of the site should be avoided.</li> <li>7. Responder suggests the site may be grade 3a agricultural land.</li> <li>8. Concern regarding access issues from Ross Road; Nantgavenny Lane is unsuitable as access.</li> <li>9. Concern regarding the potential increase in traffic and the ability of the road network to cope.</li> <li>10. Responders feel that there is a lack of public transport into Abergavenny.</li> <li>11. Concern regarding local services being able to cope with an increase in population as well as poor accessibility to local amenities from the site.</li> <li>12. Concerns that the drainage and sewerage systems are at capacity.</li> <li>13. Comments regarding currently uninterrupted views to the Skirrid mountain and countryside, from many areas of the Mardy and north Abergavenny, which would be adversely affected.</li> <li>14. Responders stated that currently there is a high number of empty and unsold homes (both existing and new build) in the local area, so why build more?</li> <li>15. Responders state that other housing developments in the area have caused pollution of the river and received NRW fines and warnings. This site is closer to the river on both sides and likely to cause significant pollution.</li> <li>16. Responders feel that the site would be subject to excessive noise from the railway line and the A465. The woodland on site currently helps to reduce the noise from the A465 for residents to the West.</li> <li>17. Concerns for light pollution and the loss of dark skies at night which support many species such as owls and bats as well as providing a venue for local ‘stargazers’.</li> <li>18. Responders state that preserving the site supports MCC, Welsh Government and NRW environmental policies.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, plus 8 Private Individuals</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, plus 28 Private Individuals.</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, plus 29 Private Individuals.</li> <li>5. 12 Private Individuals</li> <li>6. 9 Private Individuals</li> <li>7. Abergavenny &amp; District Civic Society</li> <li>8. Abergavenny Town Council, Abergavenny &amp; District Civic Society, plus 13 Private Individuals.</li> <li>9. 16 Private Individuals.</li> <li>10. 6 Private Individuals.</li> <li>11. 10 Private Individuals</li> <li>12. 4 Private Individuals</li> <li>13. 3 Private Individuals</li> <li>14. 2 Private Individuals</li> <li>15. 16 Private Individuals.</li> <li>16. 3 Private Individuals</li> <li>17. 3 Private Individuals</li> <li>18. 5 Private Individuals</li> </ol>

<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. Significant concerns have also been raised in relation to highway and pedestrian access to the site and ecological impact given the SSSI and SINIC designations relating to the site.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0247 Coopers III, Llanfoist</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes earthworks, agricultural features and boundaries. <i>No objection in principle</i></li> <li>2. Concern that road access via an extension of Jones Close would only be acceptable for about 10 homes and would require significant engineering. Access via the private treatment works access lane would require negotiation and improvement, including its junction with A4143.</li> <li>3. Concern that land south of the access lane appears to be partly liable to flooding and there is a substantial wooded wetland in the lower part of the northern section, possibly of considerable ecological value, so not suitable for development.</li> <li>4. A responders suggests that much of the field to the east is above the flood plain and should be considered for future integrated development.</li> <li>5. A responders suggests that the trees on the northern boundary and the hedgerows on the easter and southern boundaries (of the northern section) should be substantially retained.</li> <li>6. The site sponsor, Johnsey Estates UK, has submitted information in support of the site and includes the following points: <ul style="list-style-type: none"> <li>• The site is located close to employment opportunities, schools, healthcare and facilities and services at Abergavenny Town Centre and Llanfoist.</li> <li>• The southern parcel of land is available for any required off-site ecological mitigation and/or drainage should either be necessary.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny &amp; District Civic Society</li> <li>5. Abergavenny &amp; District Civic Society</li> <li>6. Johnsey Estates UK</li> </ol>
<b>LPA Response</b>	The site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0248 Adj Llanfoist Primary School (Whole Site)</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes the area as forming part of a 17<sup>th</sup> century park with likely Medieval origins.</li> <li>2. Responders stated that the woodland area of the site should not be built on.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society,</li> </ol>

	<ol style="list-style-type: none"> <li>3. Concerns that the southern part of the site would be a marked, detached protrusion beyond the now well-defined eastern boundary of Llanfoist.</li> <li>4. Responders stated that the site is Grade 2 – 3b agricultural land.</li> <li>5. Concerns that development of the site would ruin the clear views to the mountains, and the edge of countryside feel, from the playground of the Primary school; a vital part of the children’s heritage.</li> </ol>	<p>Abergavenny Transition Town</p> <ol style="list-style-type: none"> <li>3. Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny &amp; District Civic Society</li> <li>5. Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological impact. Overall, there are other sites in Abergavenny that are considered to be more suitable.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0249 Red Barn Farm (RFB2), Abergavenny</b>		<b>Responder:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Formerly part of Neville Hall Park (Neville Court; The Brooks). Built 1860s; previously existing manor. Unlikely to require mitigation.</li> <li>2. Responders state that the site falls within CSP002, a National Park buffer zone proposal that also could allow for a trunk road by-pass (current WG policy prohibits this now).</li> <li>3. A responder felt that development would be a clearly visible urban intrusion into the Usk valley. It should remain part of a buffer zone between the well-landscaped hospital and the Park boundary.</li> <li>4. A responder suggests that the spinney between the two sites should be retained for an active travel route that could connect to the Llanwenarth national cycle route.</li> <li>5. A responder suggests that housing ought to be prioritised for hospital staff to reduce in-commuting.</li> <li>6. A responder feels that a new access would be needed to the A40, perhaps shared with a new hospital access.</li> <li>7. A responder feels that the hedgerow along A40 should be retained, contributing to the green corridor entry to the town.</li> <li>8. SEWRIGS group state that the two sites fall within the Nevill Hall RIGS comprising of three components. Nevill Hall moraine feature and section, cemented outwash gravel section, post-glacial abandoned river channels and scroll marks on floodplain. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny Transition Town</li> <li>5. Abergavenny Transition Town</li> <li>6. Abergavenny Transition Town</li> <li>7. Abergavenny Transition Town</li> <li>8. SEWRIGS group</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. There are also landscape impact concerns associated with development of the site. Delivery of this site is dependent on the allocation of CS0164 – Red Barn Farm (1), which has been deemed unsuitable for allocation.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0250 Land at Evesham Nurseries, Llanfoist	Responder:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Consult Cadw regarding the need for an ASIDOHL to determine the impact on the adjoining Blaenavon Registered Landscape of Outstanding Historic Interest. The Blaenavon Industrial Landscape World Heritage Site also adjoins and assessment of the impact of the proposal on this is needed. Other features are noted in the area.</li> <li>2. A responder states that the site is Grade 3a agricultural land?</li> <li>3. Concerns re lack of local shops and facilities.</li> <li>4. Responders state that despite no extra allocations being made in the 2011-2021 LDP about 180 homes have been permitted in recent years and further allocations may be unpopular. Any further increase seems disproportionate to the number needed across the county.</li> <li>5. A responder suggests that the site, formerly a major horticultural site; could become an allotment site when the church reclaims the current site.</li> <li>6. The site sponsor, Bellway Homes, has submitted supporting documents and includes the following points: <ul style="list-style-type: none"> <li>• The site will not be at significant risk of flooding or increase the flood risk to others.</li> <li>• The site has access to a wide range of services and facilities within Abergavenny.</li> <li>• The site has access to excellent road links, railway station and a range of bus services.</li> <li>• Potential for 105 dwellings and is genuinely deliverable.</li> </ul> </li> <li>7. Concerns that some of the site has risk of flooding.</li> <li>8. Concerns for an ancient mound on the site.</li> <li>9. Concerns that access to the site is difficult.</li> <li>10. Responders state that the south west side of the site is bounded by the cycling route NCN46; making a crossing through this would diminish the amenity of the route.</li> <li>11. Concerns re the potential increase in traffic and the ability of the road network to cope.</li> <li>12. Concerns that development would compromise views and diminish the enjoyment of visitors and locals who use the canal and footpaths.</li> <li>13. Responders state that only a small proportion of the site is adjacent to the existing Llanfoist development boundary; adding this site would create a large peninsula with no natural boundary features.</li> <li>14. Responders state that the site is not within a tier of the settlement hierarchy that allows for growth in the Preferred Strategy.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny &amp; District Civic Society, 2 Private Individuals</li> <li>5. Abergavenny Transition Town</li> <li>6. Bellway Homes</li> <li>7. 3 Private Individuals</li> <li>8. 3 Private Individuals</li> <li>9. 3 Private Individuals</li> <li>10. 3 Private Individuals</li> <li>11. 3 Private Individuals</li> <li>12. 3 Private Individuals</li> <li>13. 2 Private Individuals</li> <li>14. 2 Private Individuals</li> </ol>
<b>LPA Response</b>	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need.
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.

<b>Candidate Site: CS0263 Adj Llanfoist Fawr Primary School</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. Abergavenny &amp; District Civic Society and Abergavenny Transition Town state that the site is a solitary and valuable woodland Green Infrastructure. May need an ecological survey to establish quality. Should not be disturbed by development.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as fundamental highways concerns have been raised as there is no adopted highway access available. Concerns have also been raised in relation to landscape and ecological impact. Overall, there are other sites that are considered to be more suitable in Abergavenny.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0264 Land north of St Teilos, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. HER notes the area has a corn mill, and a post Medieval bridge is at the edge of the site. Less than 30m to the Medieval church enclosure.</li> <li>2. Concerns that the site adjoins the National Park boundary and within CSP001.</li> <li>3. Responders state that the site lies beyond the built-up extent of the town and is part of an area astride the Park boundary where residential development was quite recently refused by both MCC and the Park Authority.</li> <li>4. Concern that development would detract from St Teilo's Church, a Grade 1 Listed Building.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town, Sore Group</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as significant concerns raised in relation to the heritage and ecological impact of developing the site. The central section of the site is also within a flood risk area.	

<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0265 Tredilion Park, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Tredilion Park: noted as Post-Medieval Park. Also traditional burial place of an Orgo the Giant, said to be pre AD634.</li> <li>2. Abergavenny &amp; District Civic Society and Abergavenny Transition Town state there is no need to designate this site for tourism/leisure as already partly used for this and any planning applications should be considered through the planning process.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society, Abergavenny Transition Town, Sore Group</li> </ol>
<b>LPA Response</b>	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0266 Land at Nantgavenny Business Park, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. Conditional Acceptance – site is within CSP001, however, due to recent provision of business units north of the site and the need for allocations of employment land in the area we do not object to light industrial use of the western park of this site provided specific conditions are met.</li> <li>3. Responders feel that the lower part of the site should be kept open similar to approved proposals at CS0185 and approval should not lead to further similar developments in Mardy Park to the south.</li> <li>4. Responders feel that the site edge nearest to the river should be carefully landscaped and filled with suitable, biodiverse planting.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. The site forms a logical extension to the adjoining business park and would provide much needed employment land in Abergavenny.	
<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1 employment use as set out in Policy EA1, with the site specific reference EA1a Land at Nantgavenny Business Park, Abergavenny.	



<b>Candidate Site: CS0267 Waterloo Court, Llanfoist</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Part of the area falls within the Historic Landscape Character Area HLCA012 Llanfoist. Buildings noted as tenements on the Tithe Map &amp; Apportionment of 1843 on the roadside.</li> <li>2. Abergavenny &amp; District Civic Society and Abergavenny Transition Town have no objection in principle.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society, Abergavenny Transition Town, SOUL</li> </ol>
<b>LPA Response</b>	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0268 Westgate Gardens, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Adjoins the Registered Park of Linda Vista and the Essential Setting. Assessment of the impact will need to be undertaken to Cadw Guidance.</li> <li>2. Responders state that this site is an important piece of green infrastructure within the Conservation Area.</li> <li>3. Concern that the area acts as a flood meadow.</li> <li>4. Responders suggest that a derelict gateway at the western end suggests history worth investigating.</li> <li>5. Abergavenny Transition Town have no objection in principle.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</li> <li>4. Abergavenny Town Council, Abergavenny &amp; District Civic Society, 1 Private Individual</li> <li>5. Abergavenny Transition Town</li> </ol>

<b>LPA Response</b>	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0269 Land at Grove Farm, Llanfoist</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes the area as forming part of a 17<sup>th</sup> century park and house, both with likely Medieval origins. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Objections due to insufficient information on what is intended as 'residential care' and until there is more detail it will not be known whether this is serving a justifiable local need.</li> <li>3. A responder felt that the Preferred Strategy suggests that the development of this area is unnecessary in the plan period.</li> <li>4. The site is Grade 2 – 3b agricultural land.</li> <li>5. SOUL supports the proposal.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny &amp; District Civic Society</li> <li>5. SOUL</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as significant concerns have been raised in relation to highway and pedestrian access to the site and ecological and heritage impact.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0284 Pen-y-Worlod Stables, Llanfoist</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. Abergavenny &amp; District Civic Society object – the site is dependent on CS0250 to which we also object.</li> <li>3. SOUL Support the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny &amp; District Civic Society</li> <li>3. SOUL</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as it does not provide a natural and logical extension to the settlement and does not relate physically, functionally or visually to the existing settlement pattern. Given the small numbers proposed, the site would result in a pocket development detached from the main settlement of Llanfoist. Furthermore, insufficient information has been submitted in order to conduct a full assessment of the site in relation ecology and highways.	

<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0286 Abergavenny Workhouse, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Built 1837-9 as a Workhouse, some alteration and restoration, any change will need mitigation; building recording and potentially archaeological monitoring of ground disturbance by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Responders state that the present designation as a protected employment site should be maintained.</li> <li>3. Responders state that while only one building is Listed, the complex of Victorian workhouse buildings would benefit from tidying up.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society, Abergavenny Transition Town</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as while it performs well against the site search sequence criteria, insufficient information has been submitted to undertake a full assessment. Therefore, the site will not be allocated in the RLDP. However, given the site's location within the settlement boundary proposals can be pursued via the planning application system, subject to the detailed planning policies.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Chepstow</b>		
<b>Candidate Site: CS0029 Barnetts Farm Chepstow</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Earlier buildings noted on historic mapping sequences, condition for written scheme of investigation for mitigation in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. A responder stated that information presented did not identify the number, type, or mix of dwellings/affordable dwellings proposed.</li> <li>3. Responders want no more development without affordable housing - no more housing at prices locals cannot afford.</li> <li>4. Objection to developing green field (agricultural) sites when there are brown field sites in the county.</li> <li>5. The proposed areas form the gateway to the Wye Valley which attracts visitors.</li> <li>6. The proposed areas are in close proximity to ancient woodland and an AONB.</li> <li>7. Concerns that Chepstow, and the local area, is already subject to traffic congestion and high levels of air pollution.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Mathern Community Council, 1 Private Individual</li> <li>3. 4 Private Individuals</li> <li>4. 6 Private Individuals</li> <li>5. 1 Private Individual</li> <li>6. 6 Private Individuals</li> <li>7. 16 Private Individuals</li> </ol>

	<ol style="list-style-type: none"> <li>8. A responder states that Chepstow businesses are losing custom due to traffic problems.</li> <li>9. A responder states that MCCs Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make the current traffic and pollution issues worse.</li> <li>10. A responder states the annual objective level, in MCCs Local air management strategy, is being exceeded on Hardwick Hill.</li> <li>11. There should be no more building until a bypass is built from the Severn Bridge to Gloucestershire. Closure of a road for planned maintenance caused tailbacks from Highbeech to Lydney, Thornwell and across the Severn bridge.</li> <li>12. Concerns that road access in any direction is unsuitable and unsafe.</li> <li>13. Mathern Community Council state that no public transport serves this site.</li> <li>14. A responder states that no shops or employment at this site.</li> <li>15. Concerns re poor broadband services and increased demand for schools, doctors and dentists.</li> <li>16. Planning proposals in Gloucestershire will also have a detrimental effect on Chepstow.</li> <li>17. A responder feels that more development at this site is excessive and will add to the general inability of Chepstow town to cope with more commuters who add nothing to the local economy.</li> <li>18. Concerns that drainage in the outfall area of this site (surface and foul) is overcapacity with Mounton being flooded via the brook annually and having raw sewage emitting from Manholes.</li> <li>19. Responders feel that infrastructure and service improvements would be necessary before any development at this site.</li> <li>20. Responders feel that development will ruin views of the area.</li> <li>21. CS0165 Mounton Road is a large site and nearer the motorway access and within walking distance of the town centre so appears to be a better option.</li> </ol>	<ol style="list-style-type: none"> <li>8. 1 Private Individual</li> <li>9. 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> <li>12. 3 Private Individuals</li> <li>13. Mathern Community Council</li> <li>14. 1 Private Individual</li> <li>15. Mathern Community Council, 1 Private Individual</li> <li>16. 9 Private Individual</li> <li>17. 1 Private Individual</li> <li>18. 3 Private Individual</li> <li>19. Mathern Community Council, 3 Private Individuals</li> <li>20. Mathern Community Council, 6 Private Individuals</li> <li>21. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. This site is also considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Overall, there are considered to be more be more suitable sites available in Chepstow.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0054 West of Racecourse Roundabout, Chepstow</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Route of Roman roads in and adjacent to the site, buildings noted on historic mapping sequences to the north, condition for written scheme of investigation for mitigation in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Objection to developing green field sites when there are brown field sites in the county.</li> <li>3. The proposed areas form the gateway to the Wye Valley which attracts visitors.</li> <li>4. Concerns re loss of views towards the Wye Valley.</li> <li>5. The proposed areas are in close proximity to ancient woodland and an AONB.</li> <li>6. Multiple protected species of bat and newt have habitats in the surrounding green spaces and use the site to transit and maintain their habitats.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 3 Private Individuals</li> <li>3. 2 Private Individuals</li> <li>4. 6 Private Individuals</li> <li>5. 6 Private Individuals</li> <li>6. 5 Private Individuals</li> <li>7. 2 Private Individuals</li> <li>8. 1 Private Individual</li> </ol>

	<ol style="list-style-type: none"> <li>7. Agricultural land should not be used for housing.</li> <li>8. Concerns regarding the only access to the adjacent agricultural land being through the site offered for development.</li> <li>9. Concerns that Chepstow, and the local area, is already subject to traffic congestion, long queues, and high (illegal) levels of air pollution. Hardwick Hill and Highbeech roundabout are particular pinch points.</li> <li>10. Planning proposals in Gloucestershire will also have a detrimental effect on the traffic issues in Chepstow.</li> <li>11. Responders stated that MCCs Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make the current traffic and pollution issues worse. Development will contravene UK, National and local policies.</li> <li>12. There should be no more building until a bypass is built from the Severn Bridge to Gloucestershire. Closure of a road for planned maintenance caused tailbacks from Highbeech to Lydney, Thornwell and across the Severn bridge.</li> <li>13. A responder states that Chepstow businesses are losing custom due to traffic problems.</li> <li>14. Responders feel that the site is too far from public transport options, which are poor and cannot be relied upon to meet the needs of a working population, and the area too steep for active travel.</li> <li>15. Responders feel that overdevelopment is having a detrimental effect on residents and visiting tourists.</li> <li>16. A responder states that the information presented does not identify the number, type or mix of dwellings/affordable dwellings proposed.</li> <li>17. Responder feels that the site would be better accessed from the Itton Road as there is a roundabout junction for that road with the A466.</li> <li>18. A responder feels that residential development would be poor use of the eastern part of this site; could be a visitor attraction or hotel if development is necessary.</li> <li>19. Concerns that existing community/public services are already overstretched. Infrastructure and service improvements would be necessary before any development at this site.</li> <li>20. Responders want no more development without affordable housing. No more housing at prices locals cannot afford.</li> <li>21. Concerns that there are no recreation or leisure facilities, nor green infrastructure included in the plans.</li> <li>22. Concerns regarding the proposed lake for surface water drainage and for the adequacy of sewage pumping facilities.</li> <li>23. Concerns regarding water run off and the impact of development on the water table.</li> <li>24. Support for the site having excellent road access, suitable crossings and pedestrian access to the town and local amenities.</li> </ol>	<ol style="list-style-type: none"> <li>9. 16 Private Individuals</li> <li>10. 4 Private Individuals</li> <li>11. 4 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. 1 Private Individual</li> <li>14. 9 Private Individuals</li> <li>15. 2 Private Individuals</li> <li>16. 1 Private Individual</li> <li>17. 1 Private Individual</li> <li>18. 1 Private Individual</li> <li>19. 10 Private Individuals</li> <li>20. 3 Private Individuals</li> <li>21. 1 Private Individual</li> <li>22. 1 Private Individual</li> <li>23. 1 Private Individual</li> <li>24. 1 Private Individual</li> </ol>
<b>LPA Response</b>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating viability and deliverability in accordance with key policy requirements. Inclusion of the site of this scale would also have a negative impact on ecology due to loss of a locally protected SINCP and nationally important Priority Habitats.</p>	
<b>LPA Recommendation</b>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<b>Candidate Site: CS0098 Bayfield, Chepstow</b>	<p>Representor:</p>	
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Support for the site as long as development provides at least 50% affordable housing.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>

<p>3. The site promotor, Vistry, has submitted extensive information in support of the site and makes the following key points:</p> <ul style="list-style-type: none"> <li>• The site is not subject to any fundamental constraints that cannot be mitigated.</li> <li>• The development proposals are designed in such a way that a green buffer can be maintained with Pwllmeyric ensuring no coalescence of these settlements.</li> <li>• The site is not located in an area at risk of flooding.</li> <li>• Around 13ha of green infrastructure will permeate the development and will include the retention and enhancement of the vast majority of woodland and boundary vegetation.</li> <li>• The Preliminary Transport Appraisal has identified an improvement scheme which would alleviate capacity constraints on the High Beech Roundabout; the proposed development could facilities the implementation of such a scheme.</li> </ul> <p>4. <b>Responders have support for the overall strategy but state that this site cannot be developed until the infrastructure within Chepstow to support it has been expanded.</b></p> <p>5. Responders state that no development should go ahead until a bypass has been provided.</p> <p>6. Objection to developing green field sites (with public rights of way) when there are brownfield sites in the county.</p> <p>7. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors.</p> <p>8. Concerns that the site is in close proximity to an AONB.</p> <p>9. Responders state that the site is adjacent to an ancient woodland, used extensively by local people for leisure, and supports local, protected species such as deer, bats and birds of prey.</p> <p>10. Responders state that the site has acknowledged national landscape interest and would be entirely inappropriate for the site to be allocated for development.</p> <p>11. Responders feel that the development of the site would detract unacceptably from the wider AONB setting. The visual distinction between town and protected woodland would be lost forever.</p> <p>12. Responders state that the site is on prime agricultural land.</p> <p>13. Several responders feel that the site is sloping away from the main settlement, visually relating to the AONB rather than the town, and not being conducive to quality placemaking.</p> <p>14. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues.</p> <p>15. Concerns re Chepstow being a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution (contrary to Wellbeing of Future Generations Act).</p> <p>16. Development proposals in Gloucestershire, and the wider community, will impact traffic levels in Chepstow and demand for services.</p> <p>17. Responders feel that the site is at a dangerous location for pedestrians (no safe walking routes) and active travel routes are not viable.</p> <p>18. Responders feel that the B4235 is not suitable for heavy traffic and will be increasingly dangerous during construction and afterwards.</p> <p>19. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at</p>	<p>2. Chepstow Town Council</p> <p>3. Vistry</p> <p>4. 4 Private Individuals</p> <p>5. 12 Private Individuals</p> <p>6. 20 Private Individuals</p> <p>7. 9 Private Individuals</p> <p>8. Cllr Christopher Edwards, 54 Private Individuals</p> <p>9. 52 Private Individuals</p> <p>10. 3 Private Individuals</p> <p>11. Cllr Christopher Edwards, 15 Private Individuals</p> <p>12. 11 Private Individual</p> <p>13. Cllr Christopher Edwards, 1 Private Individual</p> <p>14. Mathern Community Council, Cllr Christopher Edwards, 83 Private Individuals</p> <p>15. 44 Private Individuals</p> <p>16. 27 Private Individuals</p> <p>17. Cllr Christopher Edwards, 21 Private Individual</p> <p>18. 4 Private Individuals</p> <p>19. Mathern Community Council, 76 Private Individuals</p> <p>20. Cllr Christopher Edwards, 40 Private Individuals</p> <p>21. Cllr Christopher Edwards, 44 Private Individuals</p> <p>22. 17 Private Individuals</p> <p>23. 10 Private Individuals</p> <p>24. 1 Private Individual</p>
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	<p>NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema.</p> <p>20. Responders feel that this site is farthest from the town centre and areas of local employment and involves steep walks back from the centre.</p> <p>21. Responders state that the site is far from public transport routes and no improvement in public transport recently. Lack of suitable services (no direct rail link to Bristol) as well as cost encourages driving.</p> <p>22. Concern that congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping.</p> <p>23. Responders want no more housing at prices that locals cannot afford.</p> <p>24. Concern that affordable housing will attract crime, drugs and other anti social behaviour.</p> <p>25. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community.</p> <p>26. Concerns regarding potential groundwater contamination, from construction, of the natural spring below the site.</p> <p>27. Concerns regarding potential flooding as currently significant throughflow of water through adjacent streets during heavy rainfall.</p> <p>28. Concerns that development in Chepstow has the potential to impact the River Wye SSSI and to impact the Wye Valley Woodlands SSSI/National Nature Reserve through atmospheric pollution.</p> <p>29. Concerns that development would affect the right to light as it would impact the solar generation of solar panelled properties.</p> <p>30. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity.</p> <p>31. Concern that growth figures conflict with WG advice to limit number to a maximum of 4275 new houses and exceed this target by 40%.</p> <p>32. Concern that the Council's aspirations for job created lack credibility.</p> <p>33. A responder feels that building near the Severn bridge will attract middle aged commuters from Bristol and South Gloucestershire rather than the young people needed to rebalance the County's demography.</p> <p>34. Responders state that recent Planning Application for the site has over 800 oppositions. Site also previously refused planning for reasons which are still valid.</p> <p>35. Criticism of the LDP process - re 2nd consultation so soon after 1st, this site being the preferred option whilst not scoring the best. Plans not aligned with WG policy.</p> <p>36. Responders ask why were only 7.5% of houses on the Fairfield Mabey site allocated for affordable on that brownfield site. Now MCC is saying this greenfield site is required for Affordable Housing.</p> <p>37. Concerns regarding provision of formal and informal open spaces and Green Infrastructure onsite - history of developers not delivering.</p>	<p>25. 17 Private Individuals</p> <p>26. 1 Private Individual</p> <p>27. 13 Private Individuals</p> <p>28. 3 Private Individuals</p> <p>29. 4 Private Individuals</p> <p>30. 16 Private Individuals</p> <p>31. 16 Private Individuals</p> <p>32. 6 Private Individuals</p> <p>33. 1 Private Individual</p> <p>34. 12 Private Individuals</p> <p>35. 12 Private Individuals</p> <p>36. 7 Private Individuals</p> <p>37. 10 Private Individuals</p>
<b>LPA Response</b>	<p>Comments noted. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included amending the strategic site in Chepstow from Bayfield to Land at Mounton Road. On balance, it is considered that the benefits of the commercial development and associated job creation at the Mounton Road site outweighed the loss of higher quality agricultural land and encroachment into the existing green wedge separating Chepstow and Pwllmeyric, given the absence of alternative commercial sites and the importance of Chepstow for tourism as the gateway to the Wye Valley.</p>	

	It is considered that sufficient separation between Chepstow and Pwllmeyric would remain to prevent coalescence of the settlements. As such, it is considered that there is sufficient and more suitable land available for residential development within the town to accommodate its housing need.	
LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
Candidate Site: CS0112 Land at St Lawrence Lane, Chepstow	Representor:	
		<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER indicates the course of a Roman road passing through the south of the site, the potential site of a medieval Grange, and findspots of both Roman and Medieval date. Desk-based assessment and geo-physical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. The site promotor, Vistry, has submitted extensive information in support of the site and makes the following points: <ul style="list-style-type: none"> <li>• The site is not subject to any fundamental constraints that cannot be mitigated.</li> <li>• The proposals will maximise opportunities for active travel with a network of well connected pedestrian and cycle links that also have the advantage of providing enhanced sustainable links between Pwllmeyric and Chepstow.</li> <li>• <b>The development proposals are designed in such a way that a green buffer can be maintained with Pwllmeyric ensuring no coalescence of these settlements.</b></li> <li>• The site is not located in an area at risk of flooding.</li> <li>• The Preliminary Transport Appraisal has identified an improvement scheme which would alleviate capacity constraints on the High Beech Roundabout; the proposed development could facilities the implementation of such a scheme.</li> </ul> </li> <li>3. Responders state that a green wedge between Chepstow and Pwllmeyric is essential (to help retain their own identities) so would not support the development of CS0112.</li> <li>4. Objection to developing Green field sites when there are brownfield sites within the county.</li> <li>5. Responders state that the site is on prime agricultural land.</li> <li>6. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. Development would ruin views of the AONB.</li> <li>7. A responder feels that development would have a detrimental effect on the wildlife that currently resides in the area and hedgerows.</li> <li>8. Responders feel that green spaces enjoyed by the community should not be built on.</li> <li>9. Responders state that no development should go ahead until a bypass has been provided and substantial improvements to Highbeech roundabout.</li> <li>10. Concerns that access onto the A48 here would be dangerous and difficult to use due to queuing traffic.</li> <li>11. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues.</li> <li>12. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution (contrary to Wellbeing of Future Generations Act).</li> <li>13. Development in Gloucestershire, and the wider community, impacts traffic levels in Chepstow and demand for services.</li> </ol>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Vistry</li> <li>3. Chepstow Town Council, Mathern Community Council, Cllr Louise Brown, 4 Private Individuals</li> <li>4. 3 Private Individuals</li> <li>5. Mathern Community Council, 2 Private Individuals</li> <li>6. 11 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 3 Private Individuals</li> <li>9. Cllr Louise Brown, 3 Private Individuals</li> <li>10. Cllr Louise Brown, 1 Private Individual</li> <li>11. Mathern Community Council, Cllr Louise Brown, 15</li> <li>12. Mathern Community Council, 9</li> <li>13. 4 Private Individuals</li> <li>14. Mathern Community Council, Cllr Louise Brown, 14</li> <li>15. 1 Private Individual</li> <li>16. 5 Private Individuals</li> <li>17. 2 Private Individuals</li> <li>18. 3 Private Individuals</li> </ol>	



	<p>14. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema.</p> <p>15. Concerns that the plans don't include any additional recreation or leisure facilities. What Green Infrastructure will be included?</p> <p>16. Responders feel that affordable housing is needed but no evidence of this being supplied on current developments. The only housing that should be built in the area should be Affordable for local workers only.</p> <p>17. Responders state that the plan suggests working from home will continue but evidence suggests people are returning to the workplace.</p> <p>18. Concern re lack of plans to increase employment in the area. Workers currently employed in the area do not earn enough to be able to afford the properties being built.</p> <p>19. Responders state that site is far from the town centre, and areas of local employment, and involves steep walks back from the centre.</p> <p>20. Responders state that site is far from public transport routes and no improvement in public transport recently. Lack of suitable services (no direct rail link to Bristol) as well as cost encourages driving.</p> <p>21. Concern that there is no provision for safe walking and Active Travel routes.</p> <p>22. Concern that Chepstow is overdeveloped and will become a commuter town with no sense of community.</p> <p>23. Congestion is putting visitors off coming to Chepstow and supporting the shops and food outlets, resulting in a disappointing level of shopping.</p> <p>24. Concerns that the sewage system on Pwllmeyric Hill has significant impact on mountain stream with regular raw sewage outfall in the river.</p> <p>25. Concerns that the land floods frequently.</p> <p>26. Plan claims houses will be built as net carbon zero ready, however, no recent developments have been built to the high environmental standards we can now achieve.</p> <p>27. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the High Beech roundabout is already at full capacity.</p> <p>28. Concern that growth figures conflict with WG advice to limit number to a maximum of 4275 new houses and exceed this target by 40%.</p>	<p>19. 2 Private Individuals</p> <p>20. 3 Private Individuals</p> <p>21. 5 Private Individuals</p> <p>22. 4 Private Individuals</p> <p>23. 1 Private Individual</p> <p>24. 1 Private Individual</p> <p>25. 1 Private Individual</p> <p>26. 1 Private Individual</p> <p>27. 2 Private Individuals</p> <p>28. 2 Private Individuals</p>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating the viability and deliverability of the site. The site is within a Green Wedge and would also have negative ecology impact due to the ancient woodland priority habitat within the site.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

Candidate Site: CS0154 Land to the north of M48, Chepstow	Representor:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues. Existing disturbance from M4 construction and landscaping.</li> <li>2. Support for the site as it's near the motorway and bring additional employment to the area.</li> <li>3. Concern that development would erode the green wedge between Mathern and Bulwark.</li> <li>4. Objection to developing Green field sites when there are brownfield sites within the county.</li> <li>5. A responder feels that the green belt around Chepstow, which contains a well used public footpath, would be compromised.</li> <li>6. Responders state that the proposed areas form the gateway to the Wye Valley which attracts visitors. Development would ruin views of the AONB.</li> <li>7. A responders feels that no development should go ahead until a bypass has been provided and substantial improvements to High Beech roundabout.</li> <li>8. Concerns that access to the site will be difficult and dangerous for pedestrians.</li> <li>9. Concerns that traffic congestion within Chepstow, particularly Highbeech roundabout and Hardwick Hill, is at unacceptable levels. Any incidents or planned closures cause excessive queues.</li> <li>10. Concerns that Chepstow is a Designated Air Quality Management Area with high, potentially illegal, levels of air pollution.</li> <li>11. Development in Gloucestershire, and the wider community, impacts traffic levels in Chepstow and demand for services.</li> <li>12. Concerns that local infrastructure and services are already overstretched with no capacity to serve this site. Local roads are congested, public transport is poor, schools are oversubscribed, it's difficult to get a GP appointment, no spaces available at NHS dentists, no longer a local hospital facility. Shortage of leisure and community facilities and no cultural facilities such as a theatre or cinema.</li> <li>13. Responders state that there is no public transport serving the site.</li> <li>14. Responders state that the Council's Integrated Sustainability Appraisal makes it clear that development anywhere in Chepstow will make current traffic and pollution issues worse, with the (WeITAG) study demonstrating that the Highbeech roundabout is already at full capacity.</li> <li>15. Cllr Louise Brown questions whether there is need for further hotel accommodation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 9 Private Individuals</li> <li>3. Mathern Community Council, Cllr Louise Brown, 1 Private Individual</li> <li>4. 2 Private Individuals</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. Cllr Louise Brown</li> <li>8. Mathern Community Council, Cllr Louise Brown, 1 Private Individual</li> <li>9. 5 Private Individuals</li> <li>10. 4 Private Individuals</li> <li>11. 1 Private Individual</li> <li>12. Mathern Community Council, 8 Private Individuals</li> <li>13. Mathern Community Council, 1 Private Individual</li> <li>14. 1 Private Individual</li> <li>15. Cllr Louise Brown</li> </ol>
<b>LPA Response</b>	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.

<b>Candidate Site: CS0260 South of J2 M48 (Option 1: Hotel &amp; Employment)</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Objection to developing greenfield sites when brownfield sites are available in the county.</li> <li>3. Concern that the proposed areas form part of the gateway to the Wye Valley, which attracts visitors, and the areas are close to an AONB.</li> <li>4. Concern for the impact the increase in traffic will have on Chepstow which is already suffering from traffic congestion and high levels of air pollution.</li> <li>5. Planning proposals in Gloucestershire will have a detrimental effect on Chepstow.</li> <li>6. Responders state that public transport is not a viable option for many people – buses are infrequent and stop early and there are no direct trains to Bristol increasing use of the car.</li> <li>7. Support for the site due to it's location close to the motorway and for the additional employment it may bring.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 4 Private Individual</li> <li>5. 2 Private Individual</li> <li>6. 2 Private Individual</li> <li>7. 4 Private Individuals</li> </ol>
<b>LPA Response</b>	Comments noted. A separate Candidate Site submission for Mixed Use: Petrol Station (Sui Generis), Drive Thru (A1/A3) and Employment (B1/B2/ B8) has been submitted please see CS0261 for further details.	
<b>LPA Recommendation</b>	See response to CS0261.	
<b>Candidate Site: CS0261 South of J2 M48 (Option 2: Petrol Station, Drive Thru and Employment)</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Objection to developing greenfield sites when brownfield sites are available in the county.</li> <li>3. Concern that the proposed areas form part of the gateway to the Wye Valley, which attracts visitors, and the areas are close to an AONB.</li> <li>4. Concern for the impact the increase in traffic will have on Chepstow which is already suffering from traffic congestion and high levels of air pollution.</li> <li>5. Planning proposals in Gloucestershire will have a detrimental effect on Chepstow.</li> <li>6. Responders state that public transport is not a viable option for many people – buses are infrequent and stop early and there are no direct trains to Bristol increasing use of the car.</li> <li>7. Responder states that there are already 3 petrol stations in Chepstow so another is not needed.</li> <li>8. Concerns that a drive through would only increase traffic, pollution and littering.</li> <li>9. Support for the site due to its location close to the motorway and for the additional employment it may bring.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 4 Private Individual</li> <li>5. 2 Private Individual</li> <li>6. 2 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> <li>9. 4 Private Individuals</li> </ol>
<b>LPA Response</b>	Comments noted. The Site has recently gained planning permission (DM/2022/01155) for the non-B use suis generis use of a Petrol Station and Drive Thru facility. Overall, the remaining employment land at the site provides an opportunity for B use employment land within an already established and protected industrial site.	

<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1d Newhouse Industrial Estate, Chepstow.	
<b>Monmouth</b>		
<b>Candidate Site: CS0006 Land at Osbaston Road</b>		Representor:
	No responses received	
<b>LPA Response</b>	Comments noted. While internal and external consultee comments were obtained on this Candidate Site submission, it relates to a use more appropriately considered through the policy approach to community and recreation facilities adjoining identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific community facility related allocations in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0051 Land at Croft y Bwla</b>		Representor:
	No responses received	
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and highway concerns have also been raised in relation to the site's allocation given the large scale of the site. Overall, there are considered to be more suitable sites available in Monmouth.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0074 Land rear of The Royal Oak</b>		Representor:
	No responses received	
<b>LPA Response</b>	Comments noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0076 West of Rockfield Road, Monmouth</b>		Representor:
	1. Responder does not support the filtering out of the site due to CIRIA SuDS information released and to view their formal representations for further information.	1. Hallam Land Management Ltd.

<b>LPA Response</b>	Comment noted. Part of this Candidate Site submission has extant planning permission for 70 dwellings. The remainder of the site sits neatly within a gap between the permitted site to the east, residential development to the south and west and consequently has limited landscape impact. While the site is Best and Most Versatile agricultural Land, the principle of development in this location has been established through the permission of the adjacent site. The site benefits from good access to a range of services including a primary school, open space and neighbourhood centre. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for 60 dwellings with site specific policy requirements set out in Policy HA6 Land at Rockfield Road, Monmouth.	
<b>Candidate Site: CS0078 Croft y Bwla Farm, Monmouth</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Responder does not support the filtering out of the site due to CIRIA SuDS information released and to view their formal representations and Brookbanks Nutrient Neutrality Assessment for further information.</li> <li>2. Responder provides a summary of their Nutrient Neutrality Assessment. The summary notes that proposals for 300 dwellings at the site can be self-sufficient in becoming Nutrient Neutral in line with NRW guidance.</li> <li>3. The summary states that the proposed development will result in a positive TP budget that will require mitigation to be delivered, the summary includes mitigation proposals as such: Proposed SuDS features for surface water runoff, foul water discharge treatment and a constructed wetland suggested to treat effluent.</li> </ol>	<ol style="list-style-type: none"> <li>1. Taylor Wimpey</li> <li>2. Taylor Wimpey</li> <li>3. Taylor Wimpey</li> </ol>
<b>LPA Response</b>	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0099 Land at Drybridge Farm</b>		Representor:
	No responses received	
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape impact and heritage concerns have also been raised in relation to the site's allocation.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0136 Land at former Poultry Units at Rockfield Road</b>		Representor:
	No responses received	
<b>LPA Response</b>	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. The whole site is located in flood zone which would not be suitable for highly vulnerable development. Therefore, this site will not be allocated in the RLDP for mixed-use residential and employment use. A separate Candidate Site submission for employment use has been submitted – please see CS0272 for details.	

<b>LPA Recommendation</b>	See response to CS0272 for details.	
<b>Candidate Site: CS0151 Former Troy Rail Yard, Monmouth</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Responder notes the history of promotion of the site through the previous stages of the RLDP process, and the recommendation for the site not to progress to the next stage as the site is in the Upper River Wye catchment area, requires an FCA complying with the new TAN15 guidelines, and relates to a brownfield site development that is not permitted in area of Zone 3.</li> <li>2. Responder acknowledges the Preferred Strategy seeks to make no new allocations but believes provisions should be made for delivering sustainable growth across the entire plan period and beyond. Responder quotes Planning Policy Wales (Edition 11) reaffirming that planning authorities should take the lead on previously developed land, considering and identifying the interventions necessary to assist in its delivery.</li> <li>3. Responder provides a completed FCA for the site compliant with the new TAN15 guidelines. Responder notes the site is at risk of flooding from Zone 2 and Zone 3 but that no developments will be proposed in the areas at risk. There is a marginal surface water and small watercourse risk present in parts of the site, but these are outside of the property and site access routes, therefore complying with TAN15 guidelines. The development will not increase the risk of flooding elsewhere as adequate attenuation will be designed for events up to and including the 1-in-100yr, and a foul pumping station will be used to manage foul flows which will be positioned outside of flood Zone 2 and Zone 3.</li> <li>4. Responder believes the site should be incorporated into the settlement boundary of Monmouth.</li> </ol>	<ol style="list-style-type: none"> <li>1. 1 Private Individual</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Approximately a third of the site is located in flood zone which would not be suitable for highly vulnerable development.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0189 Land at Tudor Road, Monmouth</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Significant progress has been made on technical work and investigating a resolution to the phosphate constraint in Monmouth, by site promoter and responder Edenstone, noting that pre-application negotiations have taken place.</li> <li>2. Through pre-application and candidate site submissions, Edenstone believe their client demonstrates that a scheme for 58 dwellings can be delivered successfully.</li> </ol>	<ol style="list-style-type: none"> <li>1. Edenstone</li> <li>2. Edenstone</li> </ol>
<b>LPA Response</b>	Comments noted. his site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025, a planning application has been submitted and is currently being considered. The site performs well against the site search sequence, with excellent links to a primary school, local shop/post office and open space. A significant proportion of the site is also identified as being non-BMV land (65%), which performs well in a Monmouthshire context. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 50 dwellings with site specific policy requirements set out in Policy HA8 Land at Tudor Road, Wyesham.	

<b>Candidate Site: CS0216 Land at Hereford Road</b>		Representor:
	No responses received	
<b>LPA Response</b>	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0271 Land at Vauxhall Fields</b>		Representor:
	No responses received	
<b>LPA Response</b>	Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0272 Land at former Poultry Units at Rockfield Road</b>		Representor:
	No responses received	
<b>LPA Response</b>	While located in floodplain, this relates to a brownfield site with extant planning permission for B1 employment use, the proposed use would reflect the planning permission and therefore would not be contrary to TAN15.	
<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1 employment use as set out in Policy EA1, with the site specific reference EA1b Poultry Units, Rockfield Road, Monmouth.	
<b>Candidate Site: CS0274 Land North of Wonastow Road, Monmouth</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Richborough Estates, the site promoter, confirms through the council's high-level assessment that the site is not subject to any fundamental constraints that cannot be mitigated.</li> <li>2. Part of the site is subject to surface water flooding, but developments would mitigate this issue and improve drainage, resulting in a downstream benefit through a reduction in peak flow run-off.</li> <li>3. The site is shown, through the high-level assessment, to not be compatible due to its location within the Upper River Wye catchment area. If the council's position on phosphates change, the responder believes the site represents the most appropriate direction for future growth.</li> </ol>	<ol style="list-style-type: none"> <li>1. Richborough Estates</li> <li>2. Richborough Estates</li> <li>3. Richborough Estates</li> </ol>
<b>LPA Response</b>	Comments noted. Site is not allocated for a mixed use residential and employment site as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need. Part of the site is, however, considered appropriate for B1/B2/B8 employment uses as it forms a logical extension to adjoining employment uses and would provide much needed employment land in Monmouth.	

<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1, B2, B8 employment use as set out in Policy EA1, with the site specific reference EA1c Land north of Wonastow Road, Monmouth.	
<b>Candidate Site: CS0275 Land off Wonastow Road Industrial Estate</b>		Representor:
	No responses received	
<b>LPA Response</b>	While located within defended flood zone, the site is greenfield and the proposal is therefore contrary to provisions set out in the latest National Planning Policy in relation to Flooding.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0277 Land at Drewen Farm, Monmouth</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Responder and developer of the site, Vistry Group, is in favour of the site and welcomes the development due to its partial inclusion in the adopted LDP and vicinity to a wide range of amenities that support the development.</li> <li>2. Vistry Group has undertaken a range of initial surveys to inform the design proposals for the site and concluded that the site will be a viable and deliverable proposition.</li> <li>3. Responder believes once the phosphates challenge has been overcome at Monmouth, the delivery of the site will provide a valuable contribution towards the housing needs of the county.</li> </ol>	<ol style="list-style-type: none"> <li>1. Vistry Group</li> <li>2. Vistry Group</li> <li>3. Vistry Group</li> </ol>
<b>LPA Response</b>	Comments noted. This site was allocated in the Adopted LDP, however, phosphates prevented its development in coming forward. In view of DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025 the site can now be progressed. The site performs well against the site search sequence, with good links to a primary school, neighbourhood centre, employment uses and open space.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 110 dwellings with site specific policy requirements set out in Policy HA7 Land at Drewen Farm, Monmouth.	
<b>Candidate Site: CS0292 Rhossili, Hadnock Road</b>		Representor:
	No responses received	
<b>LPA Response</b>	Site not progressing as significant concerns have been raised in relation to highway capacity and safety, along with ecological impact.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	



## Caerwent

### Candidate Site: CS0009 Former MoD Training Centre, Caerwent

Representor:

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| <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. The site promotor states that the site is located on previously developed land.</li> <li>3. Concerns regarding the provision of Doctors, Dentists, Telephone and Broadband.</li> <li>4. Concerns regarding the provision of Primary and Secondary school places.</li> <li>5. Concerns regarding the adequacy of sewage processing.</li> <li>6. Concerns regarding surface water run off causing flooding.</li> <li>7. The flood plains provide a natural reserve for wildfowl and such habitat loss would impact a SSSI</li> <li>8. Poor local bus services with no service in the evening or on Sundays.</li> <li>9. Better train service from Caldicot required plus a bus link to the station.</li> <li>10. Concerns regarding an increase in traffic locally plus on the M4 and A48 around Larkfield, Chepstow.</li> <li>11. Further development will destroy the look and feel of these peaceful rural villages.</li> </ol> | <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Edenstone</li> <li>3. 2 Private individuals</li> <li>4. 1 Private individual</li> <li>5. 1 Private individual</li> <li>6. 2 Private individuals</li> <li>7. 1 Private individual</li> <li>8. 1 Private individual</li> <li>9. 1 Private individual</li> <li>10. 2 Private individuals</li> <li>11. 1 Private individual</li> </ol> |
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#### LPA Response

Comments noted. It is proposed to allocate the site as mixed-use residential and employment (B1) allocation in the Deposit Plan. The allocation is a sustainably located edge of settlement site, which is previously developed land that performs well against the site search sequence, with no significant constraints identified on site that would prohibit its development. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.

The mixed-use development proposal which is allocated for 40 residential units and a minimum of 1ha of B1 employment land is considered to have associated job creation with opportunities to work and live together and promote accessibility and connectivity to the existing settlement of Caerwent and the wider Severnside Region. The site is not allocated for C2 (care home) /community use (D1) as the need for these uses was not evidenced in this location.

#### LPA Recommendation

It is proposed to allocate the site for 40 dwellings with site specific policy requirements set out in Policy HA9 Land at Former MOD, Caerwent.

<b>Candidate Site: CS0017 Village Farm, Llanvair Discoed (Caerwent ward)</b>		<b>Representor:</b>
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Site c35m north of the Scheduled Monument of 13th century Llanfair Discoed Castle MM047, Roman finds recorded in the vicinity. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. The site also is not able to connect to the public sewerage system and is within a groundwater Source Protect Zone (SPZ), meaning that its development would result in an unacceptable impact on the water environment.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0071 Land at Slough Farm, Caerwent</b>		<b>Representor:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work</li> <li>2. Landscape sensitivity to residential development is high/medium.</li> <li>3. The area is classified as predictive grade 1 BMV land.</li> <li>4. The site is located a significant distance from all day to day services and responders are concerned that there is sufficient provision of services including Doctors, Dentists, Telephone, Broadband and school places.</li> <li>5. The site's relationship with the green belt designated under Policy 34 of Future Wales is also a consideration.</li> <li>6. Concern regarding underlying water courses and the risk of sink holes.</li> <li>7. Concerns re flooding and water run off entering the nearby SSSI and the danger of pollution of the SSSI by grey water.</li> <li>8. A responder states that the Nedern valley should be preserved as a green biodiversity corridor of significance as recognised by the SSSI.</li> <li>9. Concerns regarding the adequacy of sewage processing.</li> <li>10. Poor local bus services with no service in the evening or on Sundays.</li> <li>11. Better train service from Caldicot required plus a bus link to the station.</li> <li>12. Concerns re an increase in traffic.</li> <li>13. Further development will destroy the look and feel of these peaceful rural villages of Crick and Caerwent.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Edenstone plus 2 Private Individuals</li> <li>3. Edenstone</li> <li>4. Edenstone plus 2 Private Individuals</li> <li>5. Edenstone</li> <li>6. 1 Private Individual</li> <li>7. 2 Private Individual</li> <li>8. 1 Private Individual</li> <li>9. 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> <li>12. 1 Private Individual</li> <li>13. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Ecology concerns have also been identified.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Caldicot

### Candidate Site: CS0007 Pill Row, Caldicot

Representor:

1. Responder notes that employment land adjacent to Pill Row and Severn Bridge Industrial Estate has been omitted. An existing planning application has been submitted and First Investments is providing answers to questions for the Planning Committee in the coming months.
2. Owner of land adjacent to Pill Row has concerns re their land not being taken up as a candidate site for employment, when First Investments, who submitted their land, has had their site - land adjacent to Severn Bridge Industrial Estate – designated in the existing LDP. Responder requests that their land is included in the revised LDP as a candidate site for employment.
3. FI Real Estate Management Ltd strongly object to the removal of the site through the High-Level Assessment to progress to Stage 3A. FIREM object to the methodology in the Candidate Site Assessment Methodology that has been applied, disagreeing that the site cannot be mitigated for flood risk and that there should be an allowance to use a current planning application as evidence as part of the sieving exercise.
4. FIREM note that the proposed changes to TAN15 relate to providing a more flexible approach with regard to less vulnerable development, such as employment use, and believe this Candidate Site, and potentially others, should be carried forward into Stage 3A assessment. Because of the proposed changes, FIREM believe the Council should pause to allow the process to catch-up and revise the Methodology to re-run the assessments and should include a more flexible interpretation of the site opportunities that land, such as CS0007, can play for future development when the site benefits from flood defences.
5. In the view of FIREM, the associated evidence of the Employment Land Report Update would realise a different outcome to assessment of Policy SAE1h and retention of the employment land allocation.

1. Private Individual x 1
2. Private Individual x 1
3. FI Real Estate Management Ltd
4. FI Real Estate Management Ltd
5. FI Real Estate Management Ltd

#### LPA Response

Comments noted. Proposal is contrary to provisions set out in National Planning Policy in relation to Flooding. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.

#### LPA Recommendation

This site will not be allocated in the Deposit RLDP.

### Candidate Site: CS0067 East & West Church Road, Caldicot

Representor:

1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to pre-planning consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include pre-determination work; our understanding of the site has not changed since then, and our recommendation remains the same.

1. Glamorgan Gwent Archaeological Trust Ltd

#### LPA Response

Comment noted. The site is considered to be of small scale and would have limited impact on achieving the required quantum of development in this area. Site is not allocated as there is sufficient and more suitable land available for residential development within the Severnside area to accommodate its housing need.

<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0129 Dewstow Village, Former Dewstow Golf Course</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A previous response to the LDP consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation remains the same.</li> <li>2. Site promoter provides support for the Dewstow Village site noting: <ul style="list-style-type: none"> <li>• The site has capacity for 580 to 815 homes that could be delivered over a number of phases.</li> <li>• If the upper number of homes were progressed the scheme would also be able to support a local centre and an employment work hub.</li> <li>• Masterplan submitted identifies access routes through the site and access for vehicles.</li> <li>• Site has benefits of existing rights of way and links that can be enhanced with good access to primary schools.</li> <li>• Opportunity to locate outdoor play space as well as areas of sustainable urban drainage.</li> <li>• Comprises two land parcels offering flexibility in delivery and quantum of development.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Redrow Homes</li> </ol>
<b>LPA Response</b>	Comments noted. This site is considered too divorced from the settlement of Caldicot, as it is physically separated by the M48. Concerns have also been raised in relation to highways and landscape impact. There are considered to be more suitable sites available in this area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Crick</b>		
<b>Candidate Site: CS0091 Caerwent Depot, Crick</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as AMBER – Whilst the site has been disturbed by its former use, the route of a Roman road is adjacent to the site, and a Scheduled Monument (MM151 Crick Round Barrow), a burial mound is 100m W, development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Concerns re drainage, flooding, and sewerage in the area. Crick has no mains drainage system and flooding of nearby fields and properties has occurred in the recent past due to surface run off. The Crick Brook is already considered to have a flood plain within the hamlet environs and has recently caused flooding, making it unsuitable for additional water disposal. Carefully considered SuDs will need to find reliable means to deal with surface water drainage and deal with site constraints. Without</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 6 Private Individuals</li> <li>3. 6 Private Individuals</li> <li>4. 5 Private Individuals</li> <li>5. 3 Private Individuals</li> <li>6. 3 Private Individuals</li> </ol>

	<p>introducing a sewer system to Crick, the treated effluent from a development of this size cannot be dealt with, even with an on-site sewage treatment plant (STP). An existing STP from the nursing home discharged into Crick Brook repeatedly fails to function effectively, therefore increasing concern for a development of this size. Distance from site to drainage point, sewage system and watercourse, dramatically reduces feasibility of the site. Developing on this site will greatly intensify existing issues.</p> <ol style="list-style-type: none"> <li>3. Concerns re road infrastructure, traffic, and access. Significant changes to the current access will be required in order to maintain the safety of residents and visitors entering and leaving the site. Due to current and newly completed developments the area has seen a significant increase in traffic, with motorists opting to use smaller alternate routes increasing traffic in those areas. Current roads infrastructure already struggling, therefore new routes will worsen the issue causing children to be late for school, commuters late for work and an increase in pollution. Lack of amenities in the area increases traffic. Responders concerned that there is no obvious engineering solution to the issues faced. Concerns that a large proportion of residents buying homes in the new developments will be commuters to Bristol, increasing traffic and producing very little benefit to the Welsh economy.</li> <li>4. Local services such as telephone, broadband, schools, doctors, dentists, and other NHS services are at max capacity, oversubscribed and have huge waiting lists, therefore an increase in residents will only worsen issues. Concerns that there have been no provisions made to improve these facilities.</li> <li>5. Responders concern re the lack of amenities and local facilities to service the residents in the existing area, expecting worsening conditions after new developments. Public Transport in Crick is poor, running infrequently and not at times needed by those who commute. Service provisions will need to be made to facilitate this development. Responders concerned as Public Transport is not sufficient enough for day-to-day needs, yet they're being encouraged to reduce car usage in favour of Public Transport.</li> <li>6. Concern re the scale of the proposed development which would double the number of dwellings, impacting on the nature and character of the hamlet. Chepstow and the surrounding areas have been extensively developed, responders noting that these developments will represent the urbanisation of rural settlements, subsuming Crick into Caldicot. Responders object to the change in character which runs counter to the principals of Future Wales 2040.</li> <li>7. Responders note that the Crick Brook flows directly into the Nedern wetland area of SSSI status. Concern re additional housing in the area reducing green open space and countryside. The floodplains affecting the site provide a natural reserve for wildfowl, therefore development would lead to habitat loss and impact on the SSSI.</li> <li>8. Responders note lack of jobs in the local area.</li> <li>9. Concern that proposed net zero developments and the increased use of electric vehicles will not be enough to prevent the developments from having an effect on nature, flooding, and the general health of those who live in the area.</li> <li>10. Responder notes that the site has had much contamination over the area and would need substantial clearing and cleaning.</li> <li>11. Responder supports site of previously developed land in Crick.</li> <li>12. Site Promoters for Land South of Newport Road, Magor, Edenstone, note the site to be located on previously developed land and are against development for the following reasons. <ul style="list-style-type: none"> <li>• Abnormal costs associated with the delivery of the site owing to it being previously developed.</li> <li>• The site's location adjacent to Crick is far less sustainable when compared to other location in Severnside.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>7. 4 Private Individuals</li> <li>8. 1 Private Individual</li> <li>9. 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> <li>12. Edenstone</li> </ol>
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	<ul style="list-style-type: none"> <li>It is noted that whilst previously developed land should be prioritised above greenfield land when allocating sites, it is not considered sound to prioritise brownfield land which is far less sustainably located when compared with sustainably located greenfield sites such as the Land South of Newport Road, Magor.</li> </ul>	
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability for residential uses in accordance with key policy requirements. Furthermore, the site is unable to connect to the public sewerage system and is located within a groundwater Source Protection Zone. As such, development in this location would as a consequence result in an unacceptable impact on the water environment.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Magor with Undy</b>		
<b>Candidate Site: CS0038 Land to the west of Wales One Business Park, Magor</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	This site has now been constructed under planning application DM/2022/00634.	
<b>LPA Recommendation</b>	The site is allocated as a protected employment site under Policy EA2 with the site specific reference of EA2s.	
<b>Candidate Site: CS0206 South of Newport Road, Magor</b>		Representor:
	<ol style="list-style-type: none"> <li>Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Geophysical survey in 2008 on part of the site identified potential archaeological features.</li> <li>The site sponsor, Edenstone, have submitted extensive information and state that the development will provide: <ul style="list-style-type: none"> <li>A range and choice of housing (including market housing, affordable housing and potential for bungalows) along with a care home.</li> <li>Good quality open spaces, trim trails and community allotments for the benefit of existing and proposed residents.</li> <li>Green Infrastructure with biodiversity benefits (delivering a biodiversity enhancement).</li> <li>Economic benefits as the proposed development will generate jobs and create additional tax revenue.</li> </ul> </li> <li>A responder states that the site is a valuable green space which has been used by the community to walk dogs for well over 20 years; around 100 dogs use this field on a daily basis.</li> <li>A responder feels that local leisure facilities are already inadequate for the current population.</li> </ol>	<ol style="list-style-type: none"> <li>Glamorgan Gwent Archaeological Trust Ltd</li> <li>Edenstone</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> <li>1 Private Individual</li> </ol>

	<ol style="list-style-type: none"> <li>5. Concerns that health services cannot cope with a further increase in population considering the new developments at Vinegar Hill, Portskewett and Caldicot as well.</li> <li>6. Concerns that local schools are full/close to capacity.</li> <li>7. Concerns re public transport; the local bus service is infrequent, with no link to Severn Tunnel station and no buses on a Sunday. The walkway train station at Magor is needed.</li> <li>8. Concerns re parking in Magor village particularly during school drop off/pick times. This site is too far from the schools for Key Stage 1 children to walk to.</li> <li>9. Traffic concerns as any incident on the M4 has a severe impact as any traffic trying to leave the village cannot move.</li> <li>10. Flooding and excess surface water on the site is also a cause for concern. Improvements have been made but still the field is under water at times.</li> </ol>	
<b>LPA Response</b>	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0211 Land at Rockfield Road, Undy</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>
<b>LPA Response</b>	Site is not allocated as there is sufficient and more suitable land available for residential development within Severnside to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0228 Land off Green Moor Lane, Magor</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Concerns regarding increase in traffic during construction and afterwards. Lorries already cause problems blocking the entrance to Llandevenny Lane.</li> <li>3. Concerns regarding noise and lights during construction and when site in use.</li> <li>4. Concerns regarding flooding as responder currently has issues with flooding coming off the land.</li> <li>5. Responder states that screening would be needed to block out development.</li> <li>6. Concerns for the diverse wildlife currently in the area.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Site to be allocated as an employment site in the Deposit Plan. The site is part of the southern section of CS0258 (Quay Point). No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.	

<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1f Quay Point, Magor.	
<b>Candidate Site: CS0258 Quay Point (Land south of Magor Brewery)</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Concerns re the siting of a Hydrogen Plant close to a dwelling.</li> <li>3. Concerns regarding increase in traffic during construction and afterwards. Lorries already cause problems blocking the entrance to Llandevenny Lane.</li> <li>4. Concerns regarding noise and lights during construction and when site in use.</li> <li>5. Concerns regarding flooding as responder currently has issues with flooding coming off the land.</li> <li>6. Responder states that screening would be needed to block out development.</li> <li>7. Concerns for the diverse wildlife currently in the area.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Site to be allocated as an employment site in the Deposit Plan. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in the Severnside region.	
<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1f Quay Point, Magor.	
<b>Rogiet</b>		
<b>Candidate Site: CS0168 Adjacent to Merlin Close, Rogiet</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes a coin hoard of Roman date was found within the area, and remains of a Roman building excavated adjacent to the site, and a well to the south. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. The site promotor, Manor Farm Partnership, makes the following supporting comments: <ul style="list-style-type: none"> <li>• We believe this site is technically deliverable, viable and developable, meeting the requirements of the Preferred Strategy.</li> <li>• We believe the site could potentially be delivered subject to a suitable flood consequence assessment report.</li> <li>• The site would provide 50% affordable housing, enhance active travel links, provide green open space for public access and provide a high quality settlement edge.</li> </ul> </li> <li>3. Concerns regarding mineral resources – the site is currently constrained by mineral safeguarding.</li> <li>4. Responders state that the site has been graded as 1 for BMV agricultural land.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd plus 17 Private Individual</li> <li>2. Manor Farm Partnership</li> <li>3. 19 Private Individual</li> <li>4. 19 Private Individual</li> <li>5. 20 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 18 Private Individual</li> <li>8. 7 Private Individual</li> </ol>



	<ol style="list-style-type: none"> <li>5. Responders state that the site is currently classified as a Green Wedge constraining any development. The site also adjoins an existing conservation area as designated in the current LDP.</li> <li>6. A responder states that Great Crested Newts have been seen in the area, as recently as 2022 (video evidence may be available)</li> <li>7. Concerns that the site is classified, by NRW, as adjoining an area at risk of flooding from rivers and sea and the site itself is a high surface water risk.</li> <li>8. Concerns regarding ever increasing traffic issues, noise and pollution levels which would have a negative impact on the peaceful village of Rogiet.</li> <li>9. General objection to the site being included in the LDP and the affect development would have on the separation between Rogiet and Undy as well as the visual impact.</li> <li>10. Concerns regarding access to services and amenities such as dentists, medical care, shops, pubs and school places; few services are provided within Rogiet requiring residents to travel to other villages.</li> <li>11. Concerns that the site is significantly higher than the adjacent houses; any development would block natural light and affect privacy and enjoyment of those homes.</li> <li>12. General support for additional development around Rogiet.</li> </ol>	<ol style="list-style-type: none"> <li>9. 2 Private Individual</li> <li>10. 5 Private Individual</li> <li>11. 2 Private Individuals</li> <li>12. 1 Private Individual</li> </ol>
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. A significant proportion of the site is located in flood zone which would not be suitable for highly vulnerable development. The site is also within a green wedge designation where there is a presumption against new built development.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<p><b>Candidate Site: CS0253 Ifton Manor (Site A), Rogiet</b></p>		<p>Representor:</p>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Responder states that this land is agricultural for farming and grazing livestock.</li> <li>3. Responder states that the land is used by the community for walking and exercise (both for residents and pets).</li> <li>4. Concerns that this 'green wedge' is the final distinction between Rogiet and Caldicot and development would see the smaller village subsumed by the larger town.</li> <li>5. Traffic concerns as the B4245 is the only route through the village and subject to long delays when incidents happen on the network; adding more homes will create even more reliance on this single point of failure.</li> <li>6. Environment/biodiversity concerns as this area supports a vast array of local wildlife, some of which is endangered. It also serves as a release site for Hedgehog Helpline Cymru and is developing a healthy population of this endangered species.</li> <li>7. Responders raise concerns over the history of flooding of the area which often renders the site impassable with several feet of water in places. This flooding can reach within metres of existing properties so there are concerns over the impact development would have on the flooding risk to these homes. Photographs submitted as evidence.</li> <li>8. The site promoter, Taylor Wimpey PLC (Savills), has submitted extensive information to support the site and makes the following points:</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. Edenstone plus 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. Edenstone plus 1 Private Individual</li> <li>8. Taylor Wimpey PLC (Savills)</li> <li>9. 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> </ol>

	<ul style="list-style-type: none"> <li>• There is a clear aspiration, from WG and MCC, to deliver an improved vehicular linkage from either the B4245 and/or the M48 to Severn Tunnel Junction Railway Station and the indicative masterplan makes an allowance for land to provide this.</li> <li>• The site is considered to have 'High' value in terms of ecological connectivity but the site does not meet the tests for Sites of Importance for Nature Conservation and is suitable for development in part, however, extensive portions of the site cannot be developed due to flood risk so would be used for biodiversity mitigation, compensation and enhancement.</li> <li>• With regards to Active travel in a Transport Note, prepared by TPA, Ifton Manor Farm performs considerably stronger than Caldicot Eastwith regards to proximity to services, accessibility by public transport and connectivity to the existing active travel network.</li> </ul> <p>9. A responder states that this additional strategic delivery will offset the scaling back of CS0251 to deliver overall housing need.</p> <p>10. A responder states that the plan is silent on a new motorway junction on the M48 to link to STJ. The plan should set out clear support for this infrastructure and lobby WG accordingly.</p> <p>11. A responder requests that car parking spaces per dwelling are reduced from 3 to 2 so as not to re-enforce reliance on the car.</p>	
<b>LPA Response</b>	Comments noted. Site not progressing as it is designated as a green wedge in the RLDP where there is a presumption against new built development. and due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land. The site also comprises 100% BMV land (38% of which relates to Grade 1 BMV). Overall, there are considered to be more suitable alternative sites in the Severnside area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0254 Ifton Manor (Site B), Rogiet</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Responder states that this land is agricultural for farming and grazing livestock.</li> <li>3. Responder states that the land is used by the community for walking and exercise (both for residents and pets).</li> <li>4. Concerns that this 'green wedge' is the final distinction between Rogiet and Caldicot and development would see the smaller village subsumed by the larger town.</li> <li>5. Traffic concerns as the B4245 is the only route through the village and subject to long delays when incidents happen on the network; adding more homes will create even more reliance on this single point of failure.</li> <li>6. Environment/biodiversity concerns as this area supports a vast array of local wildlife, some of which is endangered. It also serves as a release site for Hedgehog Helpline Cymru and is developing a healthy population of this endangered species.</li> <li>7. Responders raise concerns over the history of flooding of the area which often renders the site impassable with several feet of water in places. This flooding can reach within metres of existing properties so there are concerns over the impact development would have on the flooding risk to these homes. Photographs submitted as evidence.</li> <li>8. The site promotor, Taylor Wimpey PLC (Savills), has submitted extensive information to support the site and makes the following key points:</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. Edenstone plus 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. Edenstone plus 1 Private Individual</li> <li>8. Taylor Wimpey PLC (Savills)</li> </ol>

	<ul style="list-style-type: none"> <li>• There is a clear aspiration, from WG and MCC, to deliver an improved vehicular linkage from either the B4245 and/or the M48 to Severn Tunnel Junction Railway Station and the indicative masterplan makes an allowance for land to provide this.</li> <li>• The site is considered to have 'High' value in terms of ecological connectivity but the site does not meet the tests for Sites of Importance for Nature Conservation and is suitable for development in part, however, extensive portions of the site cannot be developed due to flood risk so would be used for biodiversity mitigation, compensation and enhancement.</li> <li>• With regards to Active travel in a Transport Note, prepared by TPA, Ifton Manor Farm performs considerably stronger than Caldicot East with regards to proximity to services, accessibility by public transport and connectivity to the existing active travel network.</li> </ul>	
<b>LPA Response</b>	Comments noted. The site has been promoted in association with the proposed residential/mixed-use development associated with CS0253 Ifton Manor Site A which has not progressed for the reasons set out above in response to CS0253.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0255 Land adj Ifton Industrial Estate, Rogiet</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes human remains found at the quarry in the west of the estate, archaeological mitigation in the estate has not encountered any further archaeological deposits. The area is disturbed and if necessary, dependent on the changes, development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0256 The Paddocks, Adj Rogiet Pool</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. The small-scale nature of the site does not justify an allocation in the Plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Secondary Settlements

<b>Penperlleni</b>		
<b>Candidate Site: CS0037 South Usk Rd, Penperlleni</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Support for the site (along with CS0280) stating the development is capable of sitting comfortably within its landscape setting with the Council's Landscape Sensitivity Study identifying the site as having the lowest landscape sensitivity of all of the candidate sites submitted in Penperlleni.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Edenstone</li> </ol>
<b>LPA Response</b>	Comments noted. Overall, the site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 42 dwellings with site specific policy requirements set out in Policy HA12 Land west of Trem yr Ysgol, Penperlleni.	
<b>Candidate Site: CS0138 Land at Goytre Farm, Penperlleni</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes an area of agricultural estate management. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Support for the site as Penperlleni within the Preferred Strategy is highlighted as a Tier 2 secondary settlement. The settlements proximity to the A4042/Usk Road ensures convenient access to the services, amenities and employment. The village is well catered for in terms of local amenities, services and buses to Newport, Cwmbran and Abergavenny which are all located within a short walk. The representor concludes that the site lies in a sustainable settlement that is not located within the Upper River Wye Catchment Area and is not impacted by the implications of the TAN15 flood map and states that there are no designations that cannot be carefully mitigated and accommodated for.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Persimmon Homes East Wales</li> </ol>
<b>LPA Response</b>	Comments noted. Site is not progressing to the Deposit Plan as there are landscape and ecological concerns particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC). Overall, there are considered to be more suitable alternative sites in the area	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

<b>Candidate Site: CS0217 Land at Fairfield, Penperlleni</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential Medieval Manor house and possible remains. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. Site is not progressing to the Deposit Plan as the site has a significant ecology constraint as the whole of the site is within a designated Site of Importance for Nature Conservation (SINC).	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0279 Land West of Usk Road, Penperlleni</b>		Representor:
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential Medieval mill, channel, and other possible remains. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</p> <p>2. <b>The site promotor, Barratt and David Wilson Homes South Wales, has submitted extensive information in support of the site and make the following points:</b></p> <ul style="list-style-type: none"> <li>• The majority of the site is grassland which is considered in their Preliminary Ecological Appraisal to be of low ecological value.</li> <li>• The Flood Risk and Drainage Advice Note submitted previously concludes that the site is within Flood Zone 1 for Rivers and Sea and that development for housing is acceptable within this flood zone.</li> <li>• MCC's Environmental Health Assessment concludes that development of the site, for housing, is acceptable from an environmental health perspective.</li> <li>• MCC's Active Travel Assessment concludes that the site is suitable to be developed from an active travel perspective.</li> </ul>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Barratt and David Wilson Homes South Wales</p>
<b>LPA Response</b>	Comments noted. Site is not progressing to the Deposit Plan as there are significant landscape concerns in relation to developing west of the A4042 which would significantly change Penperlleni's settlement pattern and valued landscape. There are also concerns regarding connectivity to facilities in the settlement due to the location on the opposite side of the A4042. Overall, there are considered to be more suitable alternative sites in the area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0280 Land at Walnut Tree Farm, Penperlleni</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red - The HER notes the site of a potential early post-Medieval farmhouse and outbuildings shown on the Tithe of 1838. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd

	<p>2. <b>The site promotor, Edenstone, has submitted extensive information in support of the site. Key points include:</b></p> <ul style="list-style-type: none"> <li>• The site is sustainably located and could help to deliver the Council's 20 minute neighbourhood aspirations.</li> <li>• The site is close to the village centre and could encourage and support active travel.</li> <li>• The Council's Landscape Sensitivity Study identified the site as have the lowest landscape sensitivity of the candidate sites in Penperlleni.</li> <li>• On the basis of the technical assessments undertaken to date the promotor states that there are not considered to be any unresolvable constraints to the proposed development of the site.</li> </ul>	2. Edenstone
<b>LPA Response</b>	Comments noted. Site is not progressing to the Deposit Plan as the site has a significant highway constraint as it has not been able to demonstrate safe pedestrian access and connectivity from the site to the village centre of Penperlleni. Overall, there are considered to be more suitable alternative sites in the area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Raglan

### Candidate Site: CS0069 Raglan Enterprise Park

		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Previous responses to consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation stays the same.</li> <li>2. Responder in support of the site as its scale is appropriate for the village and the development would contribute to climate change initiatives and increase local employment. However, much care should be given to the development so that it meets its goals in relation to; future needs, community, environment, sustainability, and traffic production, otherwise consideration will be given to its objection.</li> <li>3. Responder believes expansion of existing commercial estate at Little Castle Farm site would be more proactive, than allocating a new site to develop on prime agricultural land. CS0278 would be a better site for the development due to its access. Acknowledgment that site CS0278 is outside of village envelope but believes this is more important for residential sites not employment sites and is positive about the prospect of employment opportunities.</li> <li>4. Responder objects to site and any other applications due to the delay in development of a previous 45 dwelling council approved residential site in Raglan.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trist Ltd</li> <li>2. Raglan Community Council</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. It proposed to allocate approximately 1.5ha of land adjoining the existing Protected Employment site as a new employment allocation, allowing for an extension to the existing Enterprise Park and supporting job growth in the Raglan and wider area. No fundamental constraints were identified as part of the assessment process. The allocation also provides an opportunity to develop an off-grid employment site linked to the proposed adjoining ground mounted solar array.	

	It is also proposed to identify approximately 16ha of land to the west of the existing Raglan Enterprise Park as having potential for a ground mounted solar development, subject to detailed planning considerations. While the site is Grade 3a BMV land, it performs best in this respect when compared to the other solar related candidate site submissions. Allocation of the site provides an opportunity to contribute to local and national renewable energy targets.
<b>LPA Recommendation</b>	It is therefore proposed to allocate part of the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1i Raglan Enterprise Park, Raglan.  Part of the site is also allocated as having potential for a ground mounted solar development in Policy CC2 – Renewable Energy Allocation.
<b>Candidate Site: CS0183 South of Monmouth Road, Raglan</b>	
	Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as AMBER – Subsequent to an archaeological desk-based assessment, geophysical survey, and archaeological field evaluation, for a previous submission in the planning process, due to evidence of Medieval activity within the area, it was, and remains, our opinion, that development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. Raglan Community council believe the development of this site would lead to an unacceptable loss of agricultural land and would damage the high-quality historical landscape important to conservation areas, the castle, and residents for recreation.</li> <li>3. Concerns re unsustainable transport and commuting impacts, safety re the increase in traffic movement, and congestion in the village centre, which is not aided by the approved application for 45 residential dwellings.</li> <li>4. Concerns re the number of housing units allocated to Raglan. Responder believes the site's scale to be out of proportion with the existing village. If it is not economical to develop a site below 120 units, then the responder believes the previously approved 45 dwellings should be annulled.</li> <li>5. Responder believes CS0205 to be a natural expansion of the village down to its natural boundary of the Wilcae River, and a better fit.</li> <li>6. Responder and site promotor, Richborough Estates, are in full support of the site for residential allocation. The responders state that there are no fundamental constraints with the site, but note that the council require an FCA to support any application, which they believe due to previous attempts of development on the site will be overcome, as flooding risks can be mitigated with scheme design/ planning condition, and that the development of the site would result in a downstream benefit through a reduction in peak flow run-off, improving future resilience.</li> <li>7. Richborough Estates maintain that the development will not only bring forward new residential development and a significant amount of public open space, but also the potential to accommodate community uses, to be determined at a later date based on local needs. An area of 0.2 ha is set aside as part of the scheme for community use.</li> </ol>
<b>LPA Response</b>	Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence with good access to local amenities and no fundamental constraints have been identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 54 dwellings with site specific policy requirements set out in Policy HA10 Land South of Monmouth Road, Raglan.

<b>Candidate Site: CS0205 Land at Usk Road, Raglan</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Previous response to consultation recommended desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work; our understanding of the site has not changed since then, and recommendation remains the same.</li> <li>2. Responder supports the allocation of the site as the developable area of the site is modest and more in scale with Raglan’s needs. As the site is not extendable, it will round the village off to the natural boundary of the brook. The site is also accessible and safe for commuting.</li> <li>3. Concerns re volume of residential development being allocated to Raglan and believes the existing 45 units allocated should be annulled.</li> <li>4. Responder believes the site would be a natural extension of the village down to its boundary of the river, having good access without impacting congestion.</li> <li>5. Site promoter and responder Edenstone, support the allocation of the site. See additional supporting documents for the Monmouthshire RLDP Preferred Strategy Representations on behalf of Edenstone.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Raglan Community Council</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. Edenstone</li> </ol>
<b>LPA Response</b>	Comments noted. While a southern section of the site is within a flood risk area, development could be directed away from this part of the site. However, the site is not allocated as there is sufficient and more suitable land available for residential development within Raglan to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0278 Land West of Raglan</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – The HER notes the site of a potential Medieval land management adjacent; artefacts of prehistoric date recorded within the site. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concerns re the scale of the site in relation to the rest of the community and its needs.</li> <li>3. The development of a site of this scale would heavily reduce the amount of high-quality agricultural land.</li> <li>4. Concerns re unsustainable transport and commuting caused by proposed development contrary to Planning Policy Wales. Site will generate an unacceptable level of traffic.</li> <li>5. Concerns re the impact that the proposed development will have on the setting and landscape of the village from viewpoints across the area.</li> <li>6. Responder objects to this site as they believe that the needs of the present are met but at the cost of compromising the ability for future generations to meet their own needs.</li> <li>7. Responder believes existing commercial estate should be expanded instead of allocating a new site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Raglan Community Council</li> <li>3. Raglan Community Council plus 1 Private Individual</li> <li>4. Raglan Community Council</li> <li>5. Raglan Community Council</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>



	<p>8. Responder believes this site to be the best out of those proposed due to its good road access and believes that the development would bring lots of advantages.</p> <p>9. Concerns regarding the incomplete residential site for 45 dwellings within the village envelope and will object of site CS0278 until the council demonstrates its ability to turn planning into reality.</p> <p>10. Responders believe the site is deliverable, viable and developable and meets the requirements of the preferred strategy.</p> <p>11. The site has good access and could be developed without significantly effecting the existing village. The site also provides a range of employment opportunities; therefore, the responders support the development of the site and ask that the council contact them if they require further information pertaining to the site.</p>	<p>9. 1 Private Individual</p> <p>10. 1 Private Individual</p> <p>11. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. A reduced area of approximately 4.5 ha (compared to the submitted 8ha) is proposed to be allocated for employment use in the RLDP, responding to site elevations and integrating the proposal more effectively into the landscape. No fundamental development constraints have been identified as part of the assessment process. Its allocation will provide much needed employment land in Raglan and the wider County reflecting Raglan's location and its access links to other settlements.	
<b>LPA Recommendation</b>	It is therefore proposed to allocate the site for B1,B2,B8 employment use as set out in Policy EA1, with the site specific reference EA1j Land West of Raglan.	
<b>Candidate Site: CS0281 Raglan Country Estate</b>		Representor:
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – The HER notes the area as a part of a Medieval deer park, some changes due to the landscaping for the golf club, areas of land remain as fields; artefacts of prehistoric date recorded within the site. An archaeological desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</p> <p>2. Concerns re scale of the development and effect this would have on the landscape from vantage points around the community.</p> <p>3. Concerns that developments would cause an increase in traffic generation.</p> <p>4. The responder objects to the development of the site as they believe it focuses on short terms needs and doesn't consider the long-term implications it could have on future residents.</p> <p>5. Responder would object to this site if CS0278 was approved as they believe it is a better site from an access point of view and would also object if there was no strategic traffic planning in place for the development.</p>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Raglan Community Council</p> <p>3. Raglan Community Council plus 1 Private Individual</p> <p>4. Raglan Community Council</p> <p>5. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Usk

## Candidate Site: CS0039 Little Castle Farm, Monmouth Road, Usk

## Representor:

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| <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements.</li> <li>3. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales.</li> <li>4. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees.</li> <li>5. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow.</li> <li>6. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality.</li> <li>7. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring.</li> <li>8. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road.</li> <li>9. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/school/leisure facilities to handle any further demand.</li> <li>10. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic.</li> <li>11. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel.</li> <li>12. Concerns re the limited amount of employment within Usk with no realistic expectation developing sufficient jobs to employ new residents.</li> <li>13. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts.</li> </ol> | <ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Usk Civic Society plus 3 Private Individuals</li> <li>3. Usk Town Council plus 13 Private Individuals</li> <li>4. Usk Town Council plus 17 Private Individuals</li> <li>5. Usk Town Council plus 13 Private Individuals</li> <li>6. Usk Town Council plus 12 Private Individuals</li> <li>7. 2 Private Individuals</li> <li>8. 2 Private Individuals</li> <li>9. Usk Town Council plus 12 Private Individuals</li> <li>10. Usk Town Council, Usk Civic Society plus 7 Private Individuals</li> <li>11. Usk Civic Society plus 6 Private Individuals</li> <li>12. 8 Private Individuals</li> <li>13. Usk Town Council plus 10 Private Individuals</li> <li>14. Usk Town Council, Usk Civic Society plus 10 Private Individuals</li> <li>15. 2 Private Individuals</li> <li>16. 1 Private Individual</li> <li>17. 1 Private Individual</li> <li>18. 1 Private Individual</li> <li>19. 1 Private Individual</li> </ol> |
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	<p>14. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined.</p> <p>15. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.</p> <p>16. Concerns re the loss of open green space, within walking distance, for health and wellbeing.</p> <p>17. Concerns that development would affect the privacy of existing homes.</p> <p>18. A responder states that Usk is a historic town and the site is the location of the battle of Pwll Melyn and as such should be preserved.</p> <p>19. Notices at the candidate sites would have ensured a more representative consultation.</p>	
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape and ecological concerns have also been raised particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC) and due to the topography of the site and its elevated position it is likely to have a detrimental landscape impact. Overall, there are considered to be more suitable alternative sites in the area.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<p><b>Candidate Site: CS0105 Land at Former Goods Yard, Usk</b></p>		<p>Representor:</p>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. 19<sup>th</sup> century goods yard to the Monmouth to Pontypool railway, extant contemporary buildings, also Second World War defences in the immediate area. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. A responder states that Flood modelling by JBA Consulting concludes that the site is at flood risk in extreme events. It is proposed that the development site is raised above the flood level to comply with TAN15. Compensatory flood storage should be implemented alongside the ground raising. The responder states that their clients control land outside of the site which could provide storage for the development of the site but could also contribute towards the wider flood defences for Usk.</li> <li>3. Usk Civic Society objects to the site due to it being in the 1 in 100 year flood event zone making it unsuitable for vulnerable housing development. Furthermore the A472 (the means of exit from the site) floods in sub 1 in 100 events (eg Storm Dennis). Other responders have concerns re the increased potential of water run-off which is already a problem on Monmouth Road.</li> <li>4. Support for development of the site as it is brownfield and its size is in proportion to the targets identified in the RLDP Preferred Strategy. The site is close to town centre enabling residents to walk and not increase traffic and development would have a positive impact on the visual appeal of the area.</li> <li>5. Respondents state that Usk and nearby settlements have very limited employment opportunities requiring residents to travel for work and as public transport is limited, to an infrequent bus service, these journeys have to be made by car.</li> <li>6. Concerns re increased pollution, as air quality levels in the town are currently below the required standards and an increase in traffic will exacerbate this, along with extra congestion, parking problems and a greater risk of accidents at current black spots.</li> <li>7. Concerns re local amenities. There is no spare capacity in services such as GPs and dentists, and, no local bank or police station.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 2 Private Individuals</li> <li>3. Usk Civic Society plus 4 Private Individuals</li> <li>4. 1 Private Individual</li> <li>5. 3 Private Individuals</li> <li>6. 4 Private Individual</li> <li>7. 4 Private Individuals</li> <li>8. 5 Private Individuals</li> <li>9. 3 Private Individuals</li> <li>10. 1 Private Individual</li> </ol>

	<p>8. Concerns regarding the ageing sewage system, lack of investment by Dwr Cymru/Welsh Water and pollution of the river Usk from sewage outfall. Respondents have further concerns of pollution to the River Usk, from increased urban run off from development of the site and the risk of increased phosphorus loading.</p> <p>9. Concerns that development will have a detrimental impact on the habitats of local wildlife; evidence of protected species at the candidate site.</p> <p>10. A responder feels that notices at the candidate sites would have ensured a more representative consultation.</p>	
<b>LPA Response</b>	<p>Site not progressing as insufficient information has been submitted in relation to viability to demonstrate the site is deliverable in accordance with key policy requirements. The site, which is within the settlement boundary of Usk is previously developed land, a protected employment site in the current LDP that has been vacant for some time.</p> <p>The site is wholly within flood zones 2 and 3, however is within a TAN15 defended zone. National Policy set out in TAN15 does allow for brownfield sites in defended zones to be considered acceptable providing they can meet flood risk criteria set out in the policy. The costs of flood risk mitigation also has had an impact of the viability and deliverability of the site.</p> <p>There is also constraint in relation connection to public sewerage system, with the connection point at least 400m away from the site, again resulting in significant costs. A private sewerage treatment plant would not be appropriate for a development of this scale, particularly as the site is within a phosphate catchment zone of the River Usk Special Area of Conservation (SAC). Overall, it is not viable and deliverable to progress this site as an allocation. The site remains in the settlement boundary and as a consequence could progress for appropriate forms of development subject to detailed planning considerations.</p>	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0113 Burrium Gate (Phase II), Usk</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements.</li> <li>3. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales.</li> <li>4. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees.</li> <li>5. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow.</li> <li>6. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Usk Civic Society plus 3 Private Individuals</li> <li>3. Usk Town Council plus 12 Private Individuals</li> <li>4. Usk Town Council plus 19 Private Individuals</li> <li>5. Usk Town Council plus 12 Private Individuals</li> <li>6. Usk Town Council plus 14 Private Individuals</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>

	<ol style="list-style-type: none"> <li>7. Concerns regarding the hazard of double parking and parking on pavements at the existing dwellings in the vicinity of this site.</li> <li>8. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring.</li> <li>9. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road.</li> <li>10. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/schools/leisure facilities to handle any further demand. A responder comments on the closure and cutting back of many services including the closure of the local police station and of the waste recycling facility.</li> <li>11. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic.</li> <li>12. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel.</li> <li>13. Concerns re the limited amount of employment within Usk with no realistic expectation of developing sufficient jobs to employ new residents; increasing the need for commuting.</li> <li>14. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts.</li> <li>15. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined.</li> <li>16. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.</li> <li>17. Concerns re the loss of open green space, within walking distance, for health and wellbeing.</li> <li>18. Responders state that Usk is a historic town and the proposed site is the location of the battle of Pwll Melyn, and as such, should be preserved. Development would have a detrimental impact on the features and areas of tourism interest and on the beautiful and peaceful landscape.</li> <li>19. Notices at the candidate sites would have ensured a more representative consultation.</li> </ol>	<ol style="list-style-type: none"> <li>9. 1 Private Individual</li> <li>10. Usk Town Council plus 15 Private Individuals</li> <li>11. Usk Town Council, Usk Civic Society plus 10 Private Individuals</li> <li>12. Usk Civic Society plus 6 Private Individuals</li> <li>13. 11 Private Individual</li> <li>14. Usk Town Council plus 11 Private Individual</li> <li>15. Usk Town Council, Usk Civic Society plus 10 Private Individuals</li> <li>16. 3 Private Individuals</li> <li>17. 1 Private Individual</li> <li>18. 2 Private Individuals</li> <li>19. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site performs well against the assessment methodology with no fundamental constraints identified. A landscape concern has been raised but it is considered that this can be mitigated providing development is maintained within a ridgeline no more than 40m above Ordnance Datum (AOD). The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 40 dwellings with site specific policy requirements set out in Policy HA11 Land east of Burrium Gate, Usk.	
<b>Candidate Site: CS0282 North Burrium Gate, Usk</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. Farm buildings extant on 1831 First Series mapping, desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. The site sponsor, Johnsey Estates 2020 Ltd, supports the site and makes the following comments:</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>

<ul style="list-style-type: none"> <li>• By virtue of its location relatively close to Monmouth and the key services and facilities available in Monmouth and in Usk itself, Usk has the potential to accommodate a level of growth.</li> <li>• Usk experiences higher levels of self-containment and provides significant potential for minimising the need to travel and for sustainable travel.</li> <li>• Initial site and other assessments have confirmed that there are no fundamental constraints to the site coming forward for development.</li> <li>• It is anticipated that the site could provide up to 95 units which would increase the critical mass of the settlement and help to sustain vital local services and facilities.</li> </ul> <ol style="list-style-type: none"> <li>3. Responders state that along with the other two sites (CS0113 and CS0282) would amount to an unacceptable scale of expansion of Usk and would be contrary to MCC policy of just a small amount of new housing in secondary settlements.</li> <li>4. Concerns re a surface water problem and the phosphate issues which continue to pollute the river. The River Usk is a SSSI/SAC and is heavily polluted with the highest phosphate levels of any river in Wales.</li> <li>5. Concerns that development will increase the risk of flooding due to the lack of natural moisture absorption through fields, hedgerows and trees.</li> <li>6. Concerns that Usk's sewerage system is antiquated and unable to cope with current demand. Sewage matter is released through the Mill St Combined Storm Overflow.</li> <li>7. The A472 passing through Usk is one of only 2 areas in Monmouthshire that is subject to Air Quality Monitoring. This is exacerbated by inadequate parking leading to on street parking which causes congestion. Any development would likely lead to further commuting and general travel with worsening air quality.</li> <li>8. Concerns for Usk bridge which cannot withstand more big lorries which would be needed for construction along with the increase in traffic that development would bring.</li> <li>9. Responders state there is no road access to this field and any new access onto Monmouth Road would require up-grading of that stretch of road.</li> <li>10. Concerns that the town does not have the infrastructure of doctors/dentists/local transport/school/leisure facilities to handle any further demand. There is no local recycling centre, supermarket nor police presence.</li> <li>11. Responders state there is a limited bus service, sporadic evening taxi service and no railway station resulting in a high dependence on car use and no investment to develop cycleways to relieve local traffic.</li> <li>12. Responders state that the site falls outside the desirable 20 minute walk from the centre of Usk town and, with it's significant gradient, would not be a sustainable site nor promote active travel.</li> <li>13. Concerns re the limited amount of employment within Usk with no realistic expectation developing sufficient jobs to employ new residents.</li> <li>14. Responders feel there is a lack of study in the area of Environment/Animals/Landscape with reference to the impact any development would have on protected animal and bird species. Usk has an iconic landscape with importance for wildlife sustainability, existing habitat and habitat connectivity for protected species such as bats and newts.</li> <li>15. Responders state that any development above the current contour of the Usk settlement would have a detrimental effect on the existing landscape. Expansive views from the nearby popular tourist footpath would be ruined.</li> <li>16. Responders state that the land proposed is greenfield, grade 3 agricultural land currently used for crops and grazing.</li> </ol>	<ol style="list-style-type: none"> <li>2. Johnsey Estates 2020 Ltd</li> <li>3. Usk Civic Society plus 4 Private Individuals</li> <li>4. Usk Town Council plus 13 Private Individuals</li> <li>5. Usk Town Council plus 17 Private Individuals</li> <li>6. Usk Town Council plus 14 Private Individuals</li> <li>7. Usk Town Council plus 14 Private Individuals</li> <li>8. 3 Private Individuals</li> <li>9. 1 Private Individual</li> <li>10. Usk Town Council plus 13 Private Individuals</li> <li>11. Usk Town Council, Usk Civic Society plus 9 Private Individuals</li> <li>12. Usk Civic Society plus 4 Private Individuals</li> <li>13. 10 Private Individuals</li> <li>14. Usk Town Council plus 10 Private Individuals</li> <li>15. Usk Town Council, Usk Civic Society plus 9 Private Individuals</li> <li>16. 5 Private Individuals</li> <li>17. 1 Private Individual</li> <li>18. 2 Private Individuals</li> <li>19. 1 Private Individual</li> </ol>
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	<p>17. Concerns re the loss of open green space, within walking distance, for health and wellbeing.</p> <p>18. Responders state that Usk is a historic town and the proposed site is the location of the battle of Pwll Melyn, and as such, should be preserved. Development would have a detrimental impact on the features and areas of tourism interest and on the beautiful and peaceful landscape.</p> <p>19. Notices at the candidate sites would have ensured a more representative consultation.</p>	
<b>LPA Response</b>	Comments noted. Site not progressing to the Deposit Plan as there are landscape and ecological concerns, particularly in relation to a significant proportion of the site being a designated Site of Importance for Nature Conservation (SINC), and due to the topography of the site and its elevated position. Overall, there are considered to be more suitable alternative sites in the area.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0285 Glen Yr Afon, Usk</b>		Representor:
	<p>1. A responder raises the following concerns:</p> <ul style="list-style-type: none"> <li>• Massive population increase with limited employment opportunities in Usk.</li> <li>• Increased pollution, congestion and parking problems.</li> <li>• Services including GP and dentist already under strain and no local bank or police station.</li> <li>• Ageing sewage system already overwhelmed.</li> <li>• Increased risk of flooding due to loss of land absorbency.</li> <li>• Further encroachment on the habitat of delicate ecosystems.</li> </ul>	<p>1. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Main Rural Settlements

Devauden		
<b>Candidate Site: CS0036 North Devauden</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. The site promotor, Leathdunn Ltd, has submitted supporting information for the site and makes the following points: <ul style="list-style-type: none"> <li>• The site is not constrained by topography, ecology, heritage or landscape features and its proximity and connection to Devauden make it a logical extension of the settlement.</li> <li>• A Flood Consequence Assessment would need to be carried out for the site to confirm its suitability for development and confirm that an FCA would be carried out and submitted with any planning application for the site should it be allocated within the RLDP.</li> <li>• The site would not contribute to coalescence of Devauden with any other settlement and would not represent encroachment into the countryside due to the presence of existing properties to the north.</li> </ul> </li> <li>3. Responders state that the site was previously rejected as a candidate site due to its High Biodiversity Value and has subsequently been designated as a SINC.</li> <li>4. The site has species-rich hedgerows and is considered to have high connectivity value to both the adjacent habitat and the wider landscape of the neighbouring SINC sites.</li> <li>5. Concerns that the site is highly visible within the Wye Valley AONB; development of a site with evidenced high biodiversity value and within an AONB would directly contravene The Well-being of Future Generations (Wales) Act 2015.</li> <li>6. Concerns that the sewage treatment plant in Devauden is at capacity; there have been sewage overflow issues already.</li> <li>7. Concerns regarding surface water run off on the property directly below the site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Leathdunn Ltd</li> <li>3. 3 Private Individuals</li> <li>4. 2 Private Individual</li> <li>5. 3 Private Individuals</li> <li>6. 2 Private Individual</li> <li>7. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0214 Land at Churchfields, Devauden</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. The site promotor, Monmouthshire Housing Association, makes the following supporting comments:</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>



	<ul style="list-style-type: none"> <li>• The development opportunity is considered to represent proportionate growth in line with the Council's Preferred Strategy.</li> <li>• The site will provide much needed affordable homes.</li> <li>• The development will help support and benefit from existing services within the settlement.</li> <li>• Devauden is served by a bus route between the key towns of Monmouth and Chepstow.</li> <li>• Landscape Appraisal confirmed that there's no reason why the site could not be developed in landscape and visual terms with regard to the AONB.</li> </ul>	2. Monmouthshire Housing Association
<b>LPA Response</b>	The site performs well against the assessment methodology with no fundamental constraints identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 20 dwellings with site specific policy requirements set out in Policy HA14 Land at Churchfields, Devauden.	
<b>Little Mill</b>		
<b>Candidate Site: CS0016 Land to the east of Little Mill</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.</li> <li>2. On the basis of the technical, work set out at the Candidate Sites stage in August 2021, the site sponsor believes this site is technically deliverable, viable and developable and meets the requirements of the Preferred Strategy. The site has sound access off the public and highway and good transport links. The responder believes the site is a logical extension to the wider village and could be developed without significantly affecting the setting of the existing village. The proposal for the site includes a small commercial hub to support local businesses and startups.</li> <li>3. A responder states that this rural employment site is on greenfield land and would not be in sufficiently close proximity to Usk to serve as a local employment opportunity for this Tier 2 Secondary Settlement.</li> <li>4. SEWRIGS group state that the site lies within the Usk Terminal Moraine Regionally Important Geodiversity Site (RIGS): Important site showing the maximum extent of the Late Devensian glaciation in SE Wales. The study of the last ice age is part of Climate Science. This site was the limit of glaciation during the last ice age. It is important that no action is taken which would jeopardise further research. As stated in Planning Policy Wales, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. BB3 Limited</li> <li>3. 1 Private Individual</li> <li>4. SEWRIGS group</li> </ol>

<b>LPA Response</b>	<p>Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.</p> <p>The commercial element of the candidate site submission for B1/B8 uses is not considered appropriate in this location and given the site's reduced size. More appropriate sites for B1/B8 uses are identified elsewhere in the County.</p>
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 20 dwellings with site specific policy requirements set out in Policy HA15 Land east of Little Mill.
<p><b>Candidate Site: CS0075 Little Mill (Site B)</b></p>	
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.</p>
<b>LPA Response</b>	<p>Comment noted. This is an existing Adopted LDP allocation (SAH11(v)) and is reallocated in the RLDP as a 'Rollover' Allocation. A resolution to approve planning application DM/2020/01438 for 15 residential units was made by Planning Committee on 16<sup>th</sup> July 2024 and is awaiting the signing of the S106 Agreement.</p>
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 15 dwellings with site specific policy requirements set out in Policy HA16 Land North of Little Mill.
<p><b>Candidate Site: CS0103 Adj Berthon Road, Little Mill</b></p>	
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. Mill race shown on historic mapping forms the southern boundary.</p> <p>2. Monmouthshire Housing Association have submitted separate supporting information but note that an FCA has been prepared which concludes that the site is in Flood Zone A which is considered to be at little or no risk of flooding and that proposed development would not increase flooding elsewhere.</p> <p>3. Concerns re volume of traffic exacerbating a dangerous junction from a private driveway, a potentially dangerous junction into the site and over height HGVs unable to pass under the railway bridge.</p> <p>4. Concerns re flooding as the lower area of the site is often waterlogged and during periods of heavy rain is flooded. The site currently acts as a sponge so should it be built on there are concerns as to the effect on water levels further down into the village.</p> <p>5. Environmental issues including concern for the three large oaks on site which provide habitat for a number of bird species, the meadow itself is a hunting ground for owls and the hedgerows provide habitat for hedgehogs and slow worms.</p> <p>6. A responder states that the village has a lack of amenities, no school and a limited bus service. Pavements under the narrow railway bridge are inadequate and there is no safe crossing for the dual carriageway.</p>
	<p>Representor:</p>
	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p> <p>2. Monmouthshire Housing Association</p> <p>3. 1 Private Individual</p> <p>4. 1 Private Individual</p> <p>5. 1 Private Individual</p> <p>6. 1 Private Individual</p>

<b>LPA Response</b>	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0104 Cae Melin, Little Mill</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues. Trackway shown on historic mapping to the east.</li> <li>2. The site sponsor, Persimmon Homes East Wales, makes the following key points: <ul style="list-style-type: none"> <li>• The site is within a short walk of local amenities and services including a bus stop which provides access to the 61 &amp; 63 services.</li> <li>• Further services, amenities and employment at nearby towns and cities are easily accessible via the A4042.</li> <li>• The site is not located within the Upper River Wye Catchment Area and is not impacted by the implications of the TAN15 flood map.</li> <li>• There are no designations that cannot be carefully mitigated and accommodated for.</li> </ul> </li> <li>3. SEWRIGS group state that the site falls within the Usk Glacier Terminal Morain RIGS. As per PPW, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature so early consultation with the local RIGS group or NRW is strongly recommended.</li> <li>4. Concerns re flooding to adjacent property caused by run off from this site; development of the site would exacerbate this.</li> <li>5. A responder states that the site is currently used for agricultural purposes: grazing for livestock as well as providing hay/silage.</li> <li>6. Concerns re increased pressure on sewerage system</li> <li>7. Concerns re overloading of local infrastructure such as doctors surgery and the school at Penperlleni.</li> <li>8. Concerns re increased traffic on the roads and reduced air quality.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Persimmon Homes East Wales</li> <li>3. SEWRIGS group</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site is not allocated as there is sufficient and more suitable land available for residential development within Little Mill to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0233 Mulberry House, Berthon Road, Little Mill</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. SEWRIGS group</li> </ol>

	2. SEWRIGS group state that the site falls within the Usk Glacier Terminal Morain RIGS. As per PPW, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature so early consultation with the local RIGS group or NRW is strongly recommended.	
<b>LPA Response</b>	Comments noted. The small-scale nature of the site does not justify an allocation in the plan. Further consideration will be given to the site as part of the settlement boundary review.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0241 Land to North of Little Mill (Site A)</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Llanbadoc</b>		
<b>Candidate Site: CS0238 Land at Prioress Mill Lane, Llanbadoc</b>		Representor:
	1. A responder makes the following points in support of the site: <ul style="list-style-type: none"> <li>• Monmouthshire has a net-outflow of commuters; support for inward investment and local employment growth/opportunities is needed.</li> <li>• This site would facilitate the provision of a range of types and sizes of employment uses in a broadly sustainable location where it could serve nearby communities, including the settlement of Usk, and complement nearby uses, on previously developed commercial land. It is therefore firmly contended that the site is in accordance with the Preferred Strategy.</li> <li>• No other Candidate Sites were promoted in or around the settlement of Usk for employment use. Only two Candidate Sites, which included employment use in rural areas, have been progressed; both of these rural employment sites are on greenfield land and neither would be in sufficiently close proximity to Usk to serve as a local employment opportunity for this Tier 2 Secondary Settlement which has been identified for growth.</li> </ul>	1. 1 Private Individual
<b>LPA Response</b>	Comments noted. Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.	

<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.
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**Llandogo**

<b>Candidate Site: CS0101 Land adjacent to Parklands, Llandogo</b>	<b>Representor:</b>
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site.</li> <li>2. The responder is concerned that the current village infrastructure is not able to sustain the new development.</li> <li>3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage.</li> <li>4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments.</li> <li>5. Bus service does not operate in times needed for an increase in usage by working people.</li> <li>6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB.</li> <li>7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches.</li> <li>8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeologic Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>

<b>LPA Response</b>	Comments noted. Site is located within the existing development boundary which is proposed to be retained in this location. Given the site’s location within the settlement boundary proposals can be pursued via the planning application system, subject to detailed planning policies.
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<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.
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<b>Candidate Site: CS0124 The Reckless, Llandogo</b>	<b>Representor:</b>
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site.</li> <li>2. The responder is concerned that the current village infrastructure is not able to sustain the new development.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeologic Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> </ol>

	<ol style="list-style-type: none"> <li>3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage.</li> <li>4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments.</li> <li>5. Bus service does not operate in times needed for an increase in usage by working people.</li> <li>6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB.</li> <li>7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches.</li> <li>8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.</li> </ol>	<ol style="list-style-type: none"> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Therefore, this site will not be allocated in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0230 Land South of A466, Llandogo</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA017 Wye Valley Railway South and the need for an ASIDOHL. No recorded or known archaeological features in the site. Wye Valley Railway forms the southern boundary.</li> <li>2. The responder is concerned that the current village infrastructure is not able to sustain the new development.</li> <li>3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage.</li> <li>4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments.</li> <li>5. Bus service does not operate in times needed for an increase in usage by working people.</li> <li>6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB.</li> <li>7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches.</li> <li>8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeologic Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>

<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0245 Land at Parklands, Llandogo</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Concerns about the impact of the site on the Lower Wye Valley Registered Landscape of Outstanding Historical interest, and HLCA024 Llandogo and the need for an ASIDOHL. No recorded or known archaeological features in the site.</li> <li>2. The responder is concerned that the current village infrastructure is not able to sustain the new development.</li> <li>3. Concerns re an increase in commuters, and that access and commuting roads used will not be suitable for an influx in usage. Roads have been subject to landslips and falling trees, deep surface water after heavy rain and surface degradation, making them not fit for current usage.</li> <li>4. Concerns re previous major water outages and the measures the wastewater treatment works will take to cope with the new developments.</li> <li>5. Bus service does not operate in times needed for an increase in usage by working people.</li> <li>6. Concerns re the use of greenfield sites for new housing and how the infrastructure needed for new developments will degrade the wildlife and biodiversity of the village, negatively impacting Wye Valley as an AONB.</li> <li>7. Concerns re flooding and what defences will need to be implemented as the site is subject to TAN 15 and water covers the lower parts of the fields when the Wye breaches.</li> <li>8. Concern re vacant properties around the site many of which are used for Holiday Letting and Airbnb, reducing the amount of long-term rental properties.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeologic Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

<b>Llanellen</b>		
<b>Candidate Site: CS0027 Adj Llanellen Court (North)</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the findspot of a 1 <sup>st</sup> century Roman brooch; not noted if an isolated find or related to other evidence of activity. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. A reduced area of 1.56ha to the candidate site submission is proposed for allocation in the RLDP to provide a more appropriate scale of development in a village context and to reflect the settlement's position in the hierarchy. Overall, the site performs well against the site search sequence and no fundamental constraints have been identified. The site also meets key policy requirements including 50% affordable housing and net zero carbon homes demonstrating its viability and deliverability.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for 26 dwellings with site specific policy requirements set out in Policy HA17 Land adjacent to Llanellen Court Farm, Llanellen.	
<b>Candidate Site: CS0215 Land at Llanellen</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the findspot of a 1 <sup>st</sup> century Roman brooch; not noted if an isolated find or related to other evidence of activity. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. 2. The site promotor has submitted Preferred Strategy representation forms and supporting information and makes the following points: <ul style="list-style-type: none"> <li>• The site is located in Flood Zone A and is considered to be at very low risk of fluvial/tidal flooding.</li> <li>• The site is well located within reasonable walking distance of local bus services and village hall.</li> </ul>	1. Glamorgan Gwent Archaeological Trust Ltd 2. Monmouthshire Housing Association
<b>LPA Response</b>	Comments noted. Site not progressing as significant concerns have been raised in relation ecological impact.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0243 North of Village Hall, Llangybi</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.	1. Glamorgan Gwent Archaeological Trust Ltd



	<p>2. The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points:</p> <ul style="list-style-type: none"> <li>Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development.</li> <li>The site itself is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre.</li> <li>The site has the capacity to accommodate a wetland area which will not only act to separate the built development from the River Usk, but will also offer the opportunity to incorporate reed beds for the purpose of phosphate stripping.</li> </ul> <p>3. A responder feels that the B4269 which links the site to the A4042 suffers from substandard junction arrangement with the A4042 in terms of geometry and visibility.</p> <p>4. The responder states that the site has a high Landmap value for LLCA in terms of visual and sensory, historic and cultural landscapes.</p> <p>5. The site lies within Flood zone 2/3 and is at risk of flooding by the River Usk.</p> <p>6. The sites northern boundary is in direct proximity to the River Usk corridor which forms part of an ecological designation within the current LDP (SSSi &amp; SAC) which indicates that the site has high ecological significance.</p>	<p>2. Llanover Estates  3. 1 Private Individual  4. 1 Private Individual  5. 1 Private Individual  6. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Llangwm</b>		
<b>Candidate Site: CS0283 Rockfield Farm, Llangwm</b>		Representor:
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – The HER notes the Scheduled Monument of Ringwork NE of New House MM074 borders the site. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</p>	<p>1. Glamorgan Gwent Archaeological Trust Ltd</p>
<b>LPA Response</b>	Comment noted. Site is not considered compatible with the Preferred Strategy due to its location in the open countryside. As such, the site is not suitable for development and has not progressed further in the candidate site assessment process.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Llangybi

### Candidate Site: CS0019 St Cybi Drive, Llangybi

Representor:

1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.
2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems.
3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood.
4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings.
5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals.
6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process.
7. Concerns regarding the existing limited bus service.
8. Concerns re distance of the site from main road systems.

1. Glamorgan Gwent Archaeological Trust
2. Llangybi Fawr Community Council plus 4 Private Individuals
3. 4 Private Individuals
4. 5 Private Individuals
5. Llangybi Fawr Community Council plus 3 Private Individuals
6. Llangybi Fawr Community Council 4 Private Individuals
7. Llangybi Fawr Community Council plus 4 Private Individuals
8. 2 Private Individuals

#### LPA Response

Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.

#### LPA Recommendation

This site will not be allocated in the Deposit RLDP.

### Candidate Site: CS0020 West The Chase, Llangybi

Representor:

1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green - No recorded or known archaeological or historic environment issues.

1. Glamorgan Gwent Archaeological Trust
2. Llangybi Fawr Community Council

	<ol style="list-style-type: none"> <li>2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems.</li> <li>3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood.</li> <li>4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings.</li> <li>5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals.</li> <li>6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process.</li> <li>7. Concerns regarding the existing limited bus service.</li> </ol>	<p>plus 4 Private Individuals</p> <ol style="list-style-type: none"> <li>3. Llangybi Fawr Community Council plus 2 Private Individuals</li> <li>4. Llangybi Fawr Community Council plus 2 Private Individuals</li> <li>5. Llangybi Fawr Community Council plus 2 Private Individuals</li> <li>6. Llangybi Fawr Community Council plus 2 Private Individuals</li> <li>7. Llangybi Fawr Community Council plus 2 Private Individuals</li> </ol>
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<p><b>Candidate Site: CS0242 Land North of New House, Llangybi</b></p>		<p>Representor:</p>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust assess the site as Red – Included orchards shown on Tithe, borders managed features of withy beds and ponds, associated with New House Farm just outside boundary to the south. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age/ Roman date in the field and surrounding fields. Desk based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concerns re the 50yr old sewage system, and its ability to cope with current sewage levels at the Treatment Plant. Frequent blockages and overflows have caused effluent to flow out onto Ynys Lane, which has had an impact on pedestrians most notably dog walkers. An increased number of residents, is believed, will exacerbate the issues, and disturb existing systems.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust</li> <li>2. Llangybi Fawr Community Council plus 1 Private Individual</li> <li>3. Llangybi Fawr Community Council</li> <li>4. Llangybi Fawr Community Council</li> </ol>

	<ol style="list-style-type: none"> <li>3. Concerns re waterlogging and natural springs which feed down into the lower reaches of the village. Surface water is already streaming through properties nearby the sites due to insufficient infrastructure. The reduction of permeable land due to development will create a serious risk of flood.</li> <li>4. Concerns re an increased number of vehicles and therefore traffic due to new developments, where existing infrastructure inadequately deals with current demands because of narrow roads and lack of pavements. Parking for vehicles has become a problem, especially near existing MHA dwellings.</li> <li>5. Concerns re the lack and loss of local amenities such as the school, shop, post office services, sports facilities, and garage. This has contributed to scepticism surrounding the areas categorisation as a main village in the RLDP proposals.</li> <li>6. Concerns re developments preventing the continued use of the site as agricultural land for sheep to graze upon and its importance in the lambing process.</li> <li>7. Concerns regarding the existing limited bus service.</li> </ol>	<p>plus 1 Private Individual</p> <ol style="list-style-type: none"> <li>5. Llangybi Fawr Community Council</li> <li>6. Llangybi Fawr Community Council</li> <li>7. Llangybi Fawr Community Council</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. Landscape concerns have also been identified and Cadw raised concerns in relation to the impact of any development upon the nearby listed building and registered historic park and garden.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Llanishen</b>		
<b>Candidate Site: CS0221 Land at Penarth Farm, Llanishen</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green – No recorded or known archaeological or historic environment issues.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>
<b>LPA Response</b>	Comment noted. Llanishen is located within Tier 4 Minor Rural Settlement. Only minor infilling considered acceptable, subject to the detailed planning policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0222 Land at Penarth Farm, Llanishen</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER notes potential mill site. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determined work.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> </ol>
<b>LPA Response</b>	Comment noted. The site is not being progressed as an allocation due to its location in the Wye Valley National Landscape (AONB) and PPW's policy position that the AONB designation should be afforded the highest protection. In addition, 67% of the site relates to Best and Most Versatile agricultural land, with	

	the Minister for Climate Change letter of 1 <sup>st</sup> March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Llanover</b>		
<b>Candidate Site: CS0139 Land at Former Petrol Station, Llanover</b>		<b>Representor:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Eastern boundary adjacent to the road bordering the Registered Park and Garden of Llanover Park PGW(Gt)41(MON) Cadw must be consulted and a Heritage Impact Assessment undertaken to ascertain the impact of the proposal on the setting of the Park.</li> <li>2. <b>The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points:</b> <ul style="list-style-type: none"> <li>• Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development.</li> <li>• The site forms a logical extension to the existing Llanover Business Centre which contributes a strong existing employment function to the settlement, providing employment opportunities both for the settlement and more widely to the nearby rural villages.</li> <li>• Llanover has relatively good connection to nearby settlements by a range of public transport and active travel opportunities and is therefore an appropriate location for employment growth.</li> </ul> </li> <li>3. A responder states that this rural employment site is on greenfield land and would not be in sufficiently close proximity to Usk to serve as a local employment opportunity for it as a Tier 2 Secondary Settlement, which has been identified for growth.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Llanover Estates</li> <li>3. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site is not progressing as an allocation due to heritage concerns regarding the impact on the Llanover Conservation Area, nearby Listed Buildings and the Llanover Historic Park and Garden.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

<b>Candidate Site: CS0140 South of Rhyd-y-Meirch, Llanover</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Green. No recorded or known archaeological or historic environment issues.</li> <li>2. <b>The site promotor, Llanover Estates, has submitted extensive information in support of the site and makes the following points:</b> <ul style="list-style-type: none"> <li>• Llanover has the potential to accommodate a level of growth as recognised through its inclusion in the Preferred Strategy as a Main Rural Settlement.</li> <li>• Initial site and other assessments have shown that there are no fundamental constraints to the site coming forward for development.</li> <li>• The site itself is not subject to any statutory designations and is located close to employment opportunities, schools, healthcare and the range of facilities and services offered by Abergavenny Town Centre.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Llanover Estates</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Mathern</b>		
<b>Candidate Site: CS0026 West Baileys Hay, Mathern</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – No recorded or known archaeological or historic environment issues. Mill race noted on historic mapping, outside the boundary to the west.</li> <li>2. Concerns re lack of infrastructure and amenities and plans for new infrastructure and amenities to support current residents, such as broadband services, playparks, and education centres. An increase in residents due to the developments will only worsen the issue.</li> <li>3. Concerns re inadequate Public Transport facilities and active travel measures to provide access to local areas and for commuting purposes, only increasing car usage.</li> <li>4. New residents are likely to work away from home increasing number of commuters. Roads are inadequate for current levels of traffic and congestion and development would exacerbate this. Current congestion on the A48 increases the number of cars using small local lanes which are not able to deal with the demand. Increased car usage leads to increased pollution. Concerns re safety of those accessing area via active travel.</li> <li>5. Concerns re impact on aesthetics. Development needs to be sensitive of the village's local character.</li> <li>6. Concerns re health services ability to cope demand and an increased number of residents due to development will increase issues.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Mathern Community Council, Cllr Louise Brown plus 3 Private Individuals</li> <li>3. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual</li> <li>4. Mathern Community Council, Cllr Louise Brown plus 4 Private Individuals</li> </ol>

	<ol style="list-style-type: none"> <li>7. Concerns re sewerage and water drainage facilities as effluent has previously spilled out onto the street and the use of WCs in local dwellings have been affected. Water pressure and electricity supply may also be affected by the developments.</li> <li>8. Site is agriculturally productive.</li> <li>9. Concerns re development of the area as it is not marked as a national growth area identified in Future Wales 2040.</li> <li>10. Concerns re sites partial inclusion in Main Village Boundary and therefore should not be taken forward into the replacement LDP.</li> <li>11. Concerns re the introduction of a younger demographic and its effects on pace of life. New residents negatively impact areas by using development as strategic residence for commuting and not contributing to existing village culture.</li> <li>12. New developments are not affordable. Concerns over the viability of 50% affordable housing and concerns over low standards for net zero homes.</li> <li>13. Lack of or no consultation with residents affected by the site. Residents not included in the correct area zones for consultation</li> </ol>	<ol style="list-style-type: none"> <li>5. Mathern Community Council, Cllr Louise Brown</li> <li>6. Mathern Community Council, Cllr Louise Brown plus 2 Private Individuals</li> <li>7. 2 Private Individuals</li> <li>8. 1 Private Individual</li> <li>9. 2 Private Individuals</li> <li>10. Cllr Louise Brown</li> <li>11. 2 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. 1 Private Individual</li> </ol>
<p><b>LPA Response</b></p>	<p>Comments noted. Site is not progressing as although the site meets key policy requirements including 50% affordable housing and net zero carbon homes, the proposed scale and size of the site is too large for a Main Rural Settlement. There are also concerns in relation to negative landscape impact associated with the proposed scale of the site within a wide open landscape, along with its close proximity to Mathern’s Conservation Area. The site search sequence has identified that there are more suitable sites available for residential development within our Main Rural Settlements to accommodate identified housing need.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<p><b>Candidate Site: CS0053 East of Cherry Trees, Mathern</b></p>		<p>Representor:</p>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Adjoins the Registered Park of WyelandsPGW(Gt)51(MON), and part of the Essential Setting is within the south-eastern part of the site. Assessment of the impact will need to be undertaken to Cadw Guidance.</li> <li>2. Drainage issues including concerns re the open water source flowing through the site which has made the site prone to flooding, development could enhance this.</li> <li>3. Concerns re access to the site and the impact of increased use by cars on non-vehicle users.</li> <li>4. Concerns over lack of infrastructure for existing residents, such as NHS availability and public transport.</li> <li>5. An increased number of residents in the area will result in more traffic and subsequent congestion.</li> <li>6. Concerns re unmanaged conservation area.</li> <li>7. Responder expresses overall support.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeologic Trust Ltd</li> <li>2. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual</li> <li>3. Cllr Louise Brown plus 1 Private Individual</li> <li>4. Mathern Community Council</li> <li>5. 1 Private Individual</li> <li>6. 1 Private Individual</li> <li>7. Mathern Community Council</li> </ol>

<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Portskewett</b>		
<b>Candidate Site: CS0066 Bridge View Farm, Portskewett</b>		<b>Representor:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Concern that local services are unable to cope with expansion. Primary schools and secondary schools are at full capacity as are the doctors and dentists.</li> <li>3. Traffic congestion is a concern as any incidents on the M4 or either of the bridges causes chaos in both directions.</li> <li>4. A responder states that a lack of local employment and public transport options means greater pollution due to reliance on the car.</li> <li>5. A responder feels that a lack of green open space and countryside is having an effect on nature, flooding and the general health of those who live here.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site is not being progressed as an allocation due to concerns raised in relation to the site's location on the Gwent Levels. In addition, the site is wholly Grade 2 BMV land, with the Minister for Climate Change letter of 1 <sup>st</sup> March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0259 Bridge View Farm, Portskewett</b>		<b>Representor:</b>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. A desk based assessment and geophysical survey prior to any determination of an application would inform mitigation which may include further pre-determination work.</li> <li>2. Concern that local services are unable to cope with expansion. Primary schools and secondary schools are at full capacity as are the doctors and dentists.</li> <li>3. Traffic congestion is a concern as any incidents on the M4 or either of the bridges causes chaos in both directions.</li> <li>4. A responder states that a lack of local employment and public transport options means greater pollution due to reliance on the car.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. 1 Private Individual</li> </ol>



	5. A responder feels that a lack of green open space and countryside is having an effect on nature, flooding and the general health of those who live here.	
<b>LPA Response</b>	Comments noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Pwllmeryric

### Candidate Site: CS0030 Land Off Chapel Lane, Pwllmeryric

Representor:

<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – A crop mark is noted in the area, no further information. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concerns re development of the area as it is not marked as a national growth area identified in Future Wales 2040.</li> <li>3. Site is an essential and clearly visible piece of green between Pwllmeryric and Mathern.</li> <li>4. Site is productively in use as valuable agricultural land.</li> <li>5. Roads surrounding the area are already congested and a new development would increase traffic and therefore noise and pollution. Potential to obstruct emergency vehicle accessibility. Access in and out of area will also be affected.</li> <li>6. Concerns re infrastructure such as broadband, education, local amenities, NHS: Doctors and Dentist already under strain from current residents, adding to this will have a detrimental impact.</li> <li>7. Compromise local character, identity, and individuality of the area as two villages will be joined if the site is no longer green belt.</li> <li>8. Concerns re drainage and the previous flooding of the area as well as new developments being able to cope with sewerage demands.</li> <li>9. Concerns re the introduction of a younger demographic and its effects on pace of life. New residents negatively impact areas by using developments as strategic dormitories for commuting to larger cities and towns.</li> <li>10. New developments are not affordable. Concerns over the viability of 50% affordable housing and concerns over low standards for net zero homes.</li> <li>11. Lack of or no consultation with residents affected by the site. Residents not included in the correct area zones for consultation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 2 Private Individuals</li> <li>3. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual</li> <li>4. Mathern Community Council plus 1 Private Individual</li> <li>5. Mathern Community Council, Cllr Louise Brown plus 4 Private Individuals</li> <li>6. Mathern Community Council, Cllr Louise Brown 4 Private Individuals</li> <li>7. Mathern Community Council, Cllr Louise Brown plus 1 Private Individual</li> </ol>
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		8. Cllr Louise Brown plus 2 Private Individuals 9. 2 Private Individuals 10. 1 Private Individual 11. 1 Private Individual
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Shirenewton

### Candidate Site: CS0111 Adjacent to Thistledown Barn, Shirenewton

Representor:

<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include pre-determination work.</li> <li>2. In favour of as it is justifiable in relation to flood risk and proposed drainage strategy in line with Statutory SuDS Standards.</li> <li>3. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>4. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>5. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>6. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>7. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust</li> <li>2. 1 Private Individual</li> <li>3. Shirenewton Community Council plus 7 Private Individuals</li> <li>4. Shirenewton Community Council plus 9 Private Individuals</li> <li>5. Shirenewton Community Council plus 5 Private Individuals</li> <li>6. Shirenewton Community Council plus 8 Private Individuals</li> <li>7. Shirenewton Community Council plus 9 Private Individuals</li> </ol>
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	<ol style="list-style-type: none"> <li>8. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>9. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>10. Responder believes sites in rural areas should be allocated for self-build bungalows for a retiring population, freeing up existing family homes in the area. Responder also believes that a rural village is not the place to build affordable homes for young people and notes that they will be better served by a town with more facilities, access to transport and a wider availability of services.</li> <li>11. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>12. Responders fail to see how development in the village will help the climate emergency, noting that it's the opposite of what Future Wales 2040 wants.</li> <li>13. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>14. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>15. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</li> <li>16. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</li> </ol>	<ol style="list-style-type: none"> <li>8. Shirenewton Community Council plus 7 Private Individuals</li> <li>9. Shirenewton Community Council plus 4 Private Individuals</li> <li>10. 1 Private Individual</li> <li>11. Shirenewton Community Council plus 2 Private Individuals</li> <li>12. 2 Private Individuals</li> <li>13. 1 Private Individual</li> <li>14. 1 Private Individual</li> <li>15. Shirenewton Community Council</li> <li>16. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as it is wholly Grade 2 Best and Most Versatile agricultural land and there are more suitable alternative sites with a lesser proportion of BMV land in Shirenewton.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0208 West Shirenewton Recreation Hall, Shirenewton</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 4 Private Individuals</li> </ol>

	<ol style="list-style-type: none"> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</li> <li>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</li> </ol>	<ol style="list-style-type: none"> <li>3. Shirenewton Community Council plus 6 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 7 Private Individuals</li> <li>6. Shirenewton Community Council plus 6 Private Individuals</li> <li>7. Shirenewton Community Council plus 5 Private Individuals</li> <li>8. Shirenewton Community Council plus 4 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 1 Private Individual</li> <li>12. 1 Private Individual</li> <li>13. Shirenewton Community Council</li> <li>14. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. Site not progressing as significant concerns have been raised in relation to heritage impact.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

<b>Candidate Site: CS0218 Land at Ditch Hill Lane, Shirenewton (Option A)</b>	Representor:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe’s Well marked at the eastern periphery, other springs marked on historic mapping; the Well marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 6 Private Individuals</li> <li>3. Shirenewton Community Council plus 7 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 8 Private Individuals</li> <li>6. Shirenewton Community Council plus 7 Private Individuals</li> <li>7. Shirenewton Community Council plus 6 Private Individuals</li> <li>8. Shirenewton Community Council plus 3 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 3 Private Individuals</li> <li>12. 1 Private Individual</li> </ol>

	<p>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</p> <p>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</p> <p>15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.</p>	<p>13. Shirenewton Community Council</p> <p>14. 1 Private Individual</p> <p>15. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0225 Land at Ditch Hill Lane, Shirenewton (Option B)</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe's Well marked at the eastern periphery, other springs marked on historic mapping; the Well marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 6 Private Individuals</li> <li>3. Shirenewton Community Council plus 7 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 8 Private Individuals</li> <li>6. Shirenewton Community Council plus 7 Private Individuals</li> <li>7. Shirenewton Community Council</li> </ol>

	<ol style="list-style-type: none"> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>13. Concerns that the proposed candidate site is capable under MCC’s housing density policy of up to 26 units, which, is far more than the settlement average.</li> <li>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</li> <li>15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.</li> </ol>	<ol style="list-style-type: none"> <li>plus 6 Private Individuals</li> <li>8. Shirenewton Community Council plus 3 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 3 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. Shirenewton Community Council</li> <li>14. 1 Private Individual</li> <li>15. 1 Private Individual</li> </ol>
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	
<p><b>Candidate Site: CS0226 Land at Ditch Hill Lane, Shirenewton (Option C)</b></p>		<p>Representor:</p>
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe’s Well marked at the eastern periphery, other springs marked on historical mapping; the Well is marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 6 Private Individuals</li> <li>3. Shirenewton Community Council plus 7 Private Individuals</li> </ol>

	<ol style="list-style-type: none"> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</li> <li>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</li> <li>15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.</li> </ol>	<ol style="list-style-type: none"> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 9 Private Individuals</li> <li>6. Shirenewton Community Council plus 8 Private Individuals</li> <li>7. Shirenewton Community Council plus 7 Private Individuals</li> <li>8. Shirenewton Community Council plus 3 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 3 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. Shirenewton Community Council</li> <li>14. 1 Private Individual</li> <li>15. 1 Private Individual</li> </ol>
<p><b>LPA Response</b></p>	<p>Comments noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements.</p>	
<p><b>LPA Recommendation</b></p>	<p>This site will not be allocated in the Deposit RLDP.</p>	



<b>Candidate Site: CS0229 Land Opposite Chepstow Garden Centre, Pwllmeyric (Shirenewton ward)</b>	Representor:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – A complex of circular enclosures as crop marks tentatively identified as part of a prehistoric burial cairns are within the area. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concerns re drainage of the site as the field regularly floods from the local stream and is potentially in a flood zone area. The issue re flooding and drainage on the site would make the site unsuitable for the residential nature of a hotel and would render the solar panels ineffective if water-logged. Responders also note that the development of the site is likely to increase flooding elsewhere in the village and nearby buildings due to increased surface water runoff from the field. Concerns re current sewage infrastructure’s inability to cope with current demands, resulting in raw sewage running down nearby roads, without any additional burden.</li> <li>3. Responders concerned re road infrastructure’s ability to deal with current demands and that development will only increase the number of cars using the local roads and also cars parked in the local lanes and in field and property access points. Development will not only increase traffic, congestion, and delays, but further degrade air quality due to increased pollution and increase noise. Responders note that motorists try to avoid traffic by using smaller local lanes that are not designed to accommodate the volume of traffic, also causing dangerous driving. Concerns re safety around the roads as the area is an existing accident hotspot having poor visibility. Responders note that the congestion also stops emergency vehicles being able to pass the main arterial route. No provisions have been made for safe walking and cycling routes, causing concerns for the safety of pedestrians. The introduction of 20mph speed limits is ineffective as reducing speeding. It is noted that there may be a conflict between the traffic coming out of both the garden centre and proposed hotel.</li> <li>4. Responders note that the site is in an area that suffers from having no spare infrastructure and amenities locally to serve it, such as broadband, reliable public transport and playparks with existing infrastructure and amenities under further strain. Responders concerned that there are zero real plans for infrastructure and amenity improvement.</li> <li>5. Concerns re NHS services at max capacity with long wait times and no availability, and a lack of schools locally to keep up with demand, both issues that will only get worse with increased development.</li> <li>6. Scale Character identity Individuality. Concerns that the development of this site will compromise the identity and individuality of the local area is not in keeping with its historic nature. The proposed solar panels and hotel on the site is noted to be totally out of place for the quiet, rural land, and will overpower and dominate the nearby properties and approach to the conservation area of Mathern village.</li> <li>7. Concerns re the removal of an essential part of the green belt/ wedge between Pwllmeyric, Hayes Gate and Mathern if this site is developed also reducing the amount of land for agriculture in the area. Responders note development of this site to be inappropriate and contrary to Planning Policy Wales Edition 11, severely affecting the rural setting and landscape of the surrounding villages. Concern that a high security fence surrounding the site will transform the area into an industrial landscape. Despite the constant expansion of the garden centre site opposite, this is still a quiet rural area and not one of industry and should therefore be kept that way.</li> <li>8. Concerns re glare caused by the solar panels due to the site’s proximity to the A48 Pwllmeyric major road, its visibility, and its openness to the surrounding landscape. The light reflected by the solar panels could dazzle drivers and cause a road traffic</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Mathern Community Council, Cllr Louise Brown plus 3 Private Individuals</li> <li>3. Mathern Community Council, Cllr Louise Brown plus 7 Private Individuals</li> <li>4. Mathern Community Council plus 4 Private Individuals</li> <li>5. 2 Private Individuals</li> <li>6. Mathern Community Council, Cllr Louise Brown plus 2 Private Individuals</li> <li>7. Mathern Community Council, Cllr Louise Brown plus 5 Private Individuals</li> <li>8. Cllr Louise Brown plus 3 Private Individuals</li> <li>9. 2 Private Individuals</li> <li>10. 2 Private Individuals</li> <li>11. Cllr Louise Brown plus 2 Private Individuals</li> <li>12. Cllr Louise Brown plus 1 Private Individual</li> <li>13. 1 Private Individual</li> <li>14. Mathern Community Council</li> <li>15. 1 Private Individual</li> <li>16. 1 Private Individual</li> <li>17. 1 Private Individual</li> </ol>

	<p>accident. The site is also looked down upon from the garden centre also causing glare issues. Responders believe solar panel sites should be in more isolated locations. Screening of the site will not be effective due to its lower position compared to the surrounding landscape.</p> <p>9. Responders concerned that development are not sustainable or help to reducing the climate emergency, even with proposed mitigation strategies.</p> <p>10. Concerns that a hotel by its very nature will increase noise and disturbance at all hours of the day. A growth of people in this currently quiet area will also increase littering, nuisance, and antisocial behaviour. Responders living in close proximity to the site note that it would result in a loss of privacy for their property, with the hotel possibly overlooking and dominating smaller buildings.</p> <p>11. Responders believe there is no necessity for hotel accommodation in Pwllmeyric as there is already tourist accommodation at Mouton Brook Lodge, Willowbrook Guest House, Marriott St Pierre Hotel and Country Club, and the Two Rivers nearby.</p> <p>12. Responder notes that the site does not lie in the boundaries of any of the villages and is also not located in any of the Less Constrained Solar Area laid out in the RLDP.</p> <p>13. Development of the site would severely affect the conservation area of Mathern and Pwllmeyric and is not in keeping with this historic area.</p> <p>14. Responder noted that a hotel would be better placed in Chepstow, where it could help to regenerate the town.</p> <p>15. Responder notes that the allocation of this site only benefits the developers and makes them profit and that the site should not be allocated as Monmouthshire is not in a national growth area identified in Future Wales 2040.</p> <p>16. Concerns re the affordability of housing in the area and that those who work the jobs brought about by the development of the hotel would not be able to afford to live in the area, further contributing to issues surrounding commuting.</p> <p>17. Responder believes the consultation for the site should be extended as the site has not been highlighted to Chepstow, Pwllmeyric and Mather residents, being hidden in the rural plans.</p>	
<b>LPA Response</b>	<p>Comments noted. While internal and external consultee comments were obtained in relation to tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.</p> <p>The solar element is not being progressed as an allocation due to concerns raised in relation to the site's proximity to the Gwent Levels Historic Landscape. Ecology concerns have also raised in relation to the presence of a SINC on site, as well as flood risk issues on the eastern edge of the site. In addition, the site is predominantly Grade 2 BMV land, with the Minister for Climate Change letter of 1<sup>st</sup> March 2022 noting that significant weight should be given to protecting BMV land where solar arrays are proposed and the availability of more suitable alternatives.</p>	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

<b>Candidate Site: CS0231 West of Shirenewton Recreation Hall (Smaller Site), Shirenewton</b>	Representor:
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED - HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based Assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 5 Private Individuals</li> <li>3. Shirenewton Community Council plus 6 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 7 Private Individuals</li> <li>6. Shirenewton Community Council plus 6 Private Individuals</li> <li>7. Shirenewton Community Council plus 5 Private Individuals</li> <li>8. Shirenewton Community Council plus 4 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 2 Private Individuals</li> <li>12. 1 Private Individual</li> </ol>

	<p>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</p> <p>15. Responder concerned that any alteration to the current drainage would adversely affect their property, causing erosion and undermining their boundary wall.</p>	<p>13. Shirenewton Community Council</p> <p>14. 1 Private Individual</p> <p>15. 1 Private Individual</p>
<b>LPA Response</b>	Comments noted. Site not progressing as significant concerns have been raised in relation to heritage impact.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Candidate Site: CS0232 Land West of Redd Landes, Shirenewton</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED - HER details extensive prehistoric artefacts in the field and surrounding fields. Desk-based Assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 5 Private Individuals</li> <li>3. Shirenewton Community Council plus 6 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 8 Private Individuals</li> <li>6. Shirenewton Community Council plus 6 Private Individuals</li> <li>7. Shirenewton Community Council plus 5 Private Individuals</li> </ol>

	<ol style="list-style-type: none"> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> <li>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</li> <li>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</li> <li>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</li> <li>15. Responders believe planned access is very dangerous as the hill is steep and the visibility is poor, posing an unacceptable level of risk.</li> <li>16. Responder is in support of the site as they believe the site is technically deliverable, viable and developable and meets the requirements of the Preferred Strategy. The site has sound access off the public highway and could be developed without significantly affecting the setting of the existing village. The site has demonstrated as having no constraints that cannot be mitigated against. The responder believes that housing can be provided in one of the most sustainable villages in the county and asks the LPA to allocate the site in the deposit LDP.</li> </ol>	<ol style="list-style-type: none"> <li>8. Shirenewton Community Council plus 4 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> <li>11. 2 Private Individuals</li> <li>12. 1 Private Individual</li> <li>13. Shirenewton Community Council</li> <li>14. 1 Private Individual</li> <li>15. 2 Private Individuals</li> <li>16. 1 Private Individual</li> </ol>
<b>LPA Response</b>	<p>Comments noted. A reduced area to the candidate site submission is proposed for allocation in the RLDP. Overall, the site performs well against the site search sequence. This site is located on the western edge of Shirenewton. While the site is partly Best and Most Versatile (BMV) agricultural land, it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land. The site benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, and is also within walking distance of the primary school. The site meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.</p>	
<b>LPA Recommendation</b>	<p>It is proposed to allocate the site for 26 dwellings with site specific policy requirements set out in Policy HA18 Land west of Redd Landes, Shirenewton.</p>	
<b>Candidate Site: CS0240 Land to the East of Mounton Court, Shirenewton</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – HER details prehistoric artefacts and crop mark enclosures in the surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 5 Private Individuals</li> <li>3. Shirenewton Community Council</li> </ol>

	<p>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</p> <p>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village. Concerns re the footpath used to access the school becoming suburban and hemmed in by development.</p> <p>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</p> <p>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</p> <p>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</p> <p>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</p> <p>10. Responders fail to see how development in the village will help the climate emergency.</p> <p>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</p> <p>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</p> <p>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</p> <p>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</p> <p>15. Responder believes the village of Shirenewton has no opportunity for sustainable growth in terms of employment.</p> <p>16. Responder believes sites in rural areas should be allocated for self-build bungalows for a retiring population, freeing up existing family homes in the area. Responder also believes that a rural village is not the place to build affordable homes for young people and notes that they will be better served by a town with more facilities, access to transport and a wider availability of services.</p>	<p>plus 6 Private Individuals</p> <p>4. Shirenewton Community Council plus 3 Private Individuals</p> <p>5. Shirenewton Community Council plus 8 Private Individuals</p> <p>6. Shirenewton Community Council plus 6 Private Individuals</p> <p>7. Shirenewton Community Council plus 5 Private Individuals</p> <p>8. Shirenewton Community Council plus 4 Private Individuals</p> <p>9. Shirenewton Community Council plus 1 Private Individual</p> <p>10. 1 Private Individual</p> <p>11. 2 Private Individuals</p> <p>12. 1 Private Individual</p> <p>13. Shirenewton Community Council</p> <p>14. 1 Private Individual</p> <p>15. 2 Private Individuals</p> <p>16. 1 Private Individual</p>
LPA Response	Comments noted. Site not progressing as concerns have been raised in relation to highway impact.	

LPA Recommendation	This site will not be allocated in the Deposit RLDP.	
	<b>Candidate Site: CS0244 Land West of Ditch Hill Lane, Shirenewton</b>	Representor:
	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as RED – Coxe’s Well marked at the eastern periphery, other springs marked on historical mapping; the Well is marked as a Brake on the Tithe Map. HER details extensive prehistoric artefacts and cropmarks, and enclosure of potential Iron Age / Roman date in the field and surrounding fields. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work.</li> <li>2. Concern re previous flooding in relation to drainage and sewerage management, with fields being flooded with raw sewerage from existing residents, and the implications caused by a new development on the site.</li> <li>3. Concerns re lack of current infrastructure in the village such as public transport, broadband, shop, pub, post office, which will be even more insufficient after this site is developed.</li> <li>4. The school has reached its maximum capacity and NHS service are being overwhelmed by current demands, which will only be exacerbated by a large increase in residents.</li> <li>5. Concerns re the scale and over-bearing plans of new developments in proportion to the existing village and therefore its character and appearance, and a reduction in the open aspect of the village and its existing views, significantly expanding the size of the village.</li> <li>6. Concerns re an increase in traffic on the rural roads, as the only option for new residents would be to access facilities in neighbouring villages and towns using private vehicles. Adding more traffic because of an increase in residents will exacerbate congestion and pollution, there are no public charging points for electric vehicles and current infrastructure to support these schemes are not complete and plans are yet to be produced. Also concerns re the lack of safe pedestrian footpaths in the village and to walk to Chepstow and no dedicated cycle route as the country lanes can be dangerous for everyone. Responders note that the development will decrease access to the area and that there is already an issue with speeding. Because of the remote nature of the site and its lack of links to centres and amenities only further increases the necessity to use cars for transport.</li> <li>7. Responders note that the development of the site would mean the loss of valuable green wedge land, important to the villages distinct sense of place and identity. The green space maintains the distinction between the countryside and the settlements and protects the open character and landscape of the area. It is also noted that the green space greatly benefits humans and wildlife and is an important component of the wildlife reserve. Concerned re development of grade one agriculture land being in contrast to the views of Future Wales 2040 which, prioritises the development of Newport, Cardiff, and the Valleys.</li> <li>8. Concern re site being outside of defined village development boundary and would extend the village envelope.</li> <li>9. Concerns re the villages lack of opportunities for sustainable growth in terms of employment as there are no SMEs to provide jobs.</li> <li>10. Responders fail to see how development in the village will help the climate emergency.</li> <li>11. Concerns of significant adverse effects on current residential amenity, by reason of noise disturbance, overlooking, loss of privacy, overshadowing etc.</li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. Shirenewton Community Council plus 6 Private Individuals</li> <li>3. Shirenewton Community Council plus 7 Private Individuals</li> <li>4. Shirenewton Community Council plus 3 Private Individuals</li> <li>5. Shirenewton Community Council plus 8 Private Individuals</li> <li>6. Shirenewton Community Council plus 7 Private Individuals</li> <li>7. Shirenewton Community Council plus 6 Private Individuals</li> <li>8. Shirenewton Community Council plus 3 Private Individuals</li> <li>9. Shirenewton Community Council plus 1 Private Individual</li> <li>10. 1 Private Individual</li> </ol>

	<p>12. Responder notes that local consultation should take place on the options before any individual sites are considered for inclusion in the allocation.</p> <p>13. Concerns that the proposed candidate site is capable under MCC's housing density policy of up to 26 units, which, is far more than the settlement average.</p> <p>14. Responder believes the proposal to be alienating the people who have moved to the countryside for all of its benefits, driving them somewhere else and reducing the desirability of the village. This is detrimental to Monmouthshire and will take away the key reasons as to why residents want to live in Shirenewton.</p> <p>15. Responder notes that the site is surrounded by the indicative green belt in Future Wales Plan 2040 and therefore, development would be contrary to Planning Policy Wales Edition 11. The site would also be too close to Mynydbach and there needs to be a distinction between the two.</p>	<p>11. 3 Private Individuals</p> <p>12. 1 Private Individual</p> <p>13. Shirenewton Community Council</p> <p>14. 1 Private Individual</p> <p>15. Cllr Louise Brown</p>
<b>LPA Response</b>	Comments noted. Site is not allocated as there is sufficient and more suitable land available for residential development within the Main Rural Settlement of Shirenewton to accommodate its housing need.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>St Arvans</b>		
<b>Candidate Site: CS0003 Livox Quarry</b>		Representor:
	<p>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red. The HER notes finds of prehistoric date, and Medieval and post-medieval artefacts also. Outside but near to the boundary are Scheduled Monuments of Roman and Modern date. Desk-based assessment and geophysical survey prior to any determination of an application would inform mitigation, which may include further pre-determination work. Also within the Registered Landscape of Outstanding Historic Interest of the Lower Wye Valley, in character area HLCA007 Livox Farm, consult Cadw regarding the need for an ASIDOHL to determine the impact on this.</p>	<p>1. Glamorgan Gwent Archaeologic Trust Ltd</p>
<b>LPA Response</b>	Comment noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	



<p><b>Candidate Site: CS0077 Adj Piercefield Public House, St Arvans</b></p>	<p>Representor:</p>
<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes route of a Roman road at the east of the site area marked as orchard on historic mapping. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.</li> <li>2. A responder states that the land provides habitat for wildlife including badgers, hedgehogs, bats, owls and mice, all of which would face a loss of habitat if the site was developed as all other local fields are used for livestock and are therefore unsuitable for this wildlife.</li> <li>3. Concerns regarding capacity of the water treatment plant.</li> <li>4. Concerns as the access for the site is likely to be opposite a busy pre-school nursery and other entrances and junctions on this busy road.</li> <li>5. SEWRIGS group state that the site lies within the Otter Hole RIGS on Datamap Wales, but the site is listed for the Otter Hole Cave system underground. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.</li> <li>6. A responder states that the land has not been used for agricultural purposes for many but is largely abandoned and is known to have Japanese knotweed in several locations.</li> <li>7. Concerns regarding a loss of privacy to properties and gardens.</li> <li>8. The site sponsor, Marston’s PLC, has submitted supporting information and makes the following points:             <ul style="list-style-type: none"> <li>• A Flood Consequence Assessment &amp; Drainage Strategy was commissioned which confirms that the site is considered appropriate for residential purposes in terms of national and local planning policy for flood risk.</li> <li>• Following assessment through a Landscape and Visual Impact Assessment the Illustrative Masterplan has emerged which ensures that the proposed development would assimilate carefully into its surrounds and would avoid any harm to the AONB.</li> <li>• The site is located immediately adjacent to the A466 and also benefits from having bus stops immediately adjacent.</li> <li>• A Viability Assessment demonstrated that the proposals could meet all S106 obligations and infrastructure requirements including 50% affordable housing.</li> <li>• The Illustrative Masterplan demonstrates that the site would be GI led in excess of 40% on site and would provide opportunities for biodiversity habitat and net-gain.</li> <li>• St Arvans is one of the most disproportionately aging communities in the County and so growth of the village through delivery of the site would serve to meet the requirements of local planning policy relating to demographic rebalancing of rural communities.</li> <li>• A Preliminary Ecological Appraisal concluded that the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is unlikely that the proposals will result in significant harm to biodiversity.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. Glamorgan Gwent Archaeological Trust Ltd</li> <li>2. 1 Private Individual</li> <li>3. 1 Private Individual</li> <li>4. 1 Private Individual</li> <li>5. SEWRIGS group plus 2 Private Individuals</li> <li>6. 1 Private Individual</li> <li>7. 1 Private Individual</li> <li>8. Marston’s PLC</li> </ol>

<b>LPA Response</b>	Comments noted. The site performs well against the assessment methodology with no fundamental constraints identified. Although within the Wye Valley National Landscape (AONB), the proposal is small scale and the landscape assessment has demonstrated limited harm. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability.
<b>LPA Recommendation</b>	It is proposed to allocate the site for approximately 16 dwellings with site specific policy requirements set out in Policy HA13 Land adjacent to Piercefield Public House, St. Arvans.

<b>Candidate Site: CS00223 Land at New Barn Workshop, St Arvans</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. HER notes route of a Roman road at the north of the site; adjoining field has find spots of prehistoric and 8 <sup>th</sup> century artefacts. Development could be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeologic Trust Ltd

<b>LPA Response</b>	Comment noted. While internal and external consultee comments were obtained on tourism sites, the proposed tourism policy approach in the Deposit Plan more appropriately allows for consideration of sustainable tourism related proposals, including beyond identified settlement boundaries. It is therefore not considered appropriate/necessary to identify site specific tourism related allocations in the RLDP.
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<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.
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## Trellech

<b>Candidate Site: CS0092 Monmouth Road, Trellech</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Amber. Following archaeological field evaluation, it was recommended that development be mitigated by condition, in accordance with an agreed Written Scheme of Historic Environment Mitigation.	1. Glamorgan Gwent Archaeological Trust Ltd

<b>LPA Response</b>	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site.
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<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.
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<b>Candidate Site: CS0234 East of De Clere Way, Trellech</b>		Representor:
	1. Glamorgan Gwent Archaeological Trust Ltd assess the site as Red – Partly with the Trellech Archaeologically Sensitive Area, archaeological evaluation adjacent encountered Medieval remains. Geophysical survey and field evaluation prior to determination of any application.	1. Glamorgan Gwent Archaeological Trust Ltd
<b>LPA Response</b>	Comment noted. Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	
<b>Werngifford Pandy</b>		
<b>Candidate Site: CS0219 Land at Sun Meadow</b>		Representor:
	No responses received.	
<b>LPA Response</b>	Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Pandy WwTW to accommodate foul flows from the site and there are concerns over flooding on the access to the site.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	

## Candidate Sites for Protection

### Abergavenny & Llanfoist

#### Candidate Site: CSP001 Gavenny Valley, Abergavenny

#### Representor:

1. Support for inclusion as part of a policy for a Green Wedge buffer between the built-up area and the National Park and to protect the lower sides of the Gavenny Valley between the built-up area and the railway/A465 from further development.
2. Responders state that the steeply sloping wooded lower part of the site is a SINC including floodplains which have their own unique biodiversity and a developed species hierarchy.
3. Concerns that the site is partly liable to flood, absorbing excess rainfall which prevents flooding of existing homes and the risk of subsidence.
4. Concerns that an ancient woodland SSSI crosses the site providing an east-west wildlife corridor. Development would require access from Ross Road via a small area of level field and a breach in the SSSI. There are many trees on site subject to TPOs.
5. Concern about the impact of any development on the river quality. The river supports many species, some protected under the Wildlife and Countryside Act 1981, such as brown trout, otters, white-clawed crayfish, kingfishers, dippers, various birds of prey and various bats.
6. Abergavenny Town Council state that the site is within the setting of St Teilo's Church, a Grade 1 Listed Building. A responder also mentions the presence of World War 2 Pill Boxes and an Air Raid Shelter which should be preserved.
7. Responders state that the preservation of this site supports MCC, Welsh Government and NRW environmental policies and addresses the Climate and Nature Emergencies called by WG.
8. Responders state that the site provides access to dark skies.
9. Responders state that the woodland helps to reduce noise from the A465.
10. Responders state that the site provides valuable amenity space giving easy access to beautiful walks benefiting both mental and physical wellbeing. A responder believes the site meets DES2 criteria.
11. Responders state that the site provides uninterrupted countryside views to Skirrid Mountain; development would alter the skyline for the worse.
12. Responders state that the previous MCC Ecological Site Assessment (previous LDP/CS0054) recommended that the development of a high proportion of the site should be avoided.
13. Responders state that the site is important for tourism in the area, supporting existing holiday accommodation. Feedback from visitors confirms appreciation for this unspoilt area so close to the town.
14. Abergavenny & District Civic Society suggest the site may be Grade 3a agricultural land.
15. Concerns for the loss of undeveloped land; brownfield sites should be developed.
16. Concerns for the increase in traffic and pollution that development would bring.
17. Concerns for building more homes when a number of houses in the area remain unoccupied.

1. Abergavenny Town Council plus 16 Private Individuals
2. Abergavenny Town Council, Abergavenny & District Civic Society plus 15 Private Individuals
3. Abergavenny Town Council, plus 16 Private Individuals
4. Abergavenny & District Civic Society plus 20 Private Individuals
5. Abergavenny Town Council, Abergavenny & District Civic Society, plus 23 Private Individuals
6. Abergavenny Town Council plus 2 Private Individuals
7. 10 Private Individuals
8. 6 Private Individuals
9. 10 Private Individuals
10. 13 Private Individuals
11. 5 Private Individuals
12. 1 Private Individual
13. 2 Private Individuals
14. Abergavenny & District Civic Society
15. 5 Private Individual
16. 5 Private Individual
17. 2 Private Individuals

<b>LPA Response</b>	Comments noted. The site has been considered as part of the review of Areas of Amenity Importance which concludes that apart from Croesonen Parc, which will be designated separately, the site is mostly private, inaccessible and considered to be Open Countryside.	
<b>LPA Recommendation</b>	The site is therefore not suitable for designation as an Area of Amenity Importance.	
<b>Candidate Site: CSP002 Western Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge.</li> <li>2. Abergavenny Town Council and Abergavenny &amp; District Civic Society state that the site forms the National Park buffer zone proposal which could allow for a trunk road by-pass.</li> <li>3. Abergavenny Town Council and Abergavenny &amp; District Civic Society raise concerns that a flood risk from mountain streams may impact any development on the site.</li> <li>4. Abergavenny &amp; District Civic Society state that the site is Grade 3a agricultural land quality.</li> </ol>	<ol style="list-style-type: none"> <li>1. 2 Private Individuals</li> <li>2. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>3. Abergavenny Town Council, Abergavenny &amp; District Civic Society</li> <li>4. Abergavenny &amp; District Civic Society</li> </ol>
<b>LPA Response</b>	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations.	
<b>LPA Recommendation</b>	The candidate site has also been assessed as part of the Green Wedge Assessment and in accordance with the review's findings, the relevant sections of the site have been designated as green wedge.	
<b>Candidate Site: CSP003 Land at Pentre Road, Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge.</li> <li>2. Abergavenny Town Council state that the site is steeply sloped and prominent to views from the south with no mitigating green infrastructure that would help to absorb any development into the landscape.</li> <li>3. Abergavenny Town Council state that a thick hedgerow on the western boundary must be safeguarded.</li> <li>4. Responders feel that the woodland is an important element of the town's green infrastructure.</li> <li>5. Responders state that the site offers iconic views of The Sugar Loaf Mountain and along with the unspoilt nature of the landscape is a key asset to Abergavenny's tourism.</li> <li>6. Responders state that the site on the border of the Abergavenny Conservation Area and that four of the eleven fields which constitute the site are registered as SINCs. The fields are therefore of very high ecological value, supporting a high level of natural wildlife including birds of prey and mammals, and should be protected.</li> <li>7. Concerns that residential development will increase light pollution adversely affecting nocturnal wildlife in the BBNP.</li> <li>8. SOUL state that many of the lanes which surround or cross the site are single track providing excellent conditions for walking and exercise.</li> <li>9. Responders state that these lanes provide access to The Sugar Loaf, St Mary's Vale and The Vineyard for serious walkers, visiting tourists and locals and act as a natural boundary between the town development and the countryside.</li> </ol>	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council, SOUL, 208 Private Individuals</li> <li>2. Abergavenny Town Council plus 7 Private Individual</li> <li>3. Abergavenny Town Council</li> <li>4. Abergavenny Town Council, 1 Private Individual</li> <li>5. SOUL, 19 Private Individual</li> <li>6. SOUL plus 17 Private Individuals</li> <li>7. 2 Private Individuals</li> <li>8. SOUL plus 12 Private Individual</li> </ol>

	<ol style="list-style-type: none"> <li>10. A responder states that the site provides connectivity with the green infrastructure of the town – linking the National Park and Conservation Area designations to the town’s green spaces.</li> <li>11. There is concern that allowing development at this site would set a precedent for other sites in the area.</li> <li>12. Responders felt that the site is has no local shops and only a two-hourly bus service and that any residential development would be up to 2km from the town centre services.</li> <li>13. Traffic issues were raised with concerns that any development would increase traffic and may require a new junction with the A40. Access would be through narrow, often single lane, streets which are not suitable for through traffic. These narrow lanes would make Active Travel difficult.</li> <li>14. Concerns re pollution from an increase in traffic from development.</li> <li>15. Concerns that there is no infrastructure to support any development here, no extra jobs, schools, shops, medical facilities.</li> <li>16. Concerns re drainage problems in the area and the increased risk of run-off water during heavy rainfall.</li> <li>17. The 11 fields, which occupy the proposed Green Wedge, are of high quality land offering grazing to horses, cattle and sheep.</li> <li>18. Better development options are available on the site east of the A465, and the railway station, and vacant buildings, and brownfield sites, within the town could be utilised.</li> </ol>	<ol style="list-style-type: none"> <li>9. SOUL, 10 Private Individuals</li> <li>10. 2 Private Individual</li> <li>11. Abergavenny Town Council</li> <li>12. Abergavenny Town Council plus 2 Private Individual</li> <li>13. Abergavenny Town Council plus 14 Private Individual</li> <li>14. 1 Private Individual</li> <li>15. 2 Private Individual</li> <li>16. 1 Private Individual</li> <li>17. 5 Private Individual</li> <li>18. 3 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations.	
<b>LPA Recommendation</b>	The candidate site has also been assessed as part of the Green Wedge Assessment and consistent with its findings the site is designated as a Green Wedge in the RLDP.	
<b>Candidate Site: CSP004 Land north of Abergavenny</b>		Responder:
	<ol style="list-style-type: none"> <li>1. General support for protection as a buffer to the National Park; to be retained as a Green Wedge.</li> <li>2. Concerns were raised regarding the slope of the site, and its prominence in views from the east, and the lack of green infrastructure to help it blend into the landscape.</li> <li>3. A responder states that the area is of high visual landscape importance, highly visible from popular tourist routes to the Sugarloaf. It provides the setting for the National Park, with iconic views towards the Sugarloaf Mountain and St Mary’s Vale as well as the setting for the Abergavenny Conservation Area. It also provides connectivity with the green infrastructure of the town, linking the National Park, Conservation Area designations and the town’s green spaces such as Bailey Park.</li> <li>4. SOUL state that four of the eleven fields which constitute the site are registered as SINCS. Development of this site would have a negative effect on the Conservation Area which abuts it.</li> <li>5. SOUL state that many of the lanes which surround or cross the site are single track providing excellent conditions for walking and exercise.</li> <li>6. SOUL state that these lanes provide access to The Sugar Loaf, St Mary’s Vale and The Vineyard for serious walkers, visiting tourists and locals.</li> <li>7. Traffic issues were raised with concerns that any development would increase traffic on Old Hereford Road which would further overload Pen y Pound and its junction with the A40.</li> <li>8. Responders suggest that the slope of the site might render substantial Active Travel unlikely and would limit access to existing shops and of the town centre by foot, therefore, requiring a frequent bus service / increased use of the car.</li> </ol>	<ol style="list-style-type: none"> <li>1. Abergavenny Town Council, SOUL plus 1 Private Individual</li> <li>2. Abergavenny Town Council plus 1 Private Individual</li> <li>3. SOUL plus 1 Private Individual</li> <li>4. SOUL</li> <li>5. SOUL</li> <li>6. SOUL</li> <li>7. Abergavenny Town Council</li> <li>8. Abergavenny Town Council</li> <li>9. Abergavenny Town Council</li> <li>10. Abergavenny Town Council</li> </ol>

	<p>9. There is concern that allowing development at this site would set a precedent for other sites in the area.</p> <p>10. The woodland is an important element of the town's green infrastructure as an extension to the Deri woodlands and prominent from the east.</p>	
<b>LPA Response</b>	Comments noted. The site has been assessed as part of the Green Wedge Assessment and consistent with its recommendations the northern slither of land, adjoining the BBNP boundary, has been designated as a Green Wedge due to its function in relation to the protection of Abergavenny's setting with the BBNP. However, the Green Wedge Assessment also concludes that the southern section of the site has a moderate buffer role and therefore a green wedge designation is not considered appropriate. Consistent with national guidance, which allows for green wedge and settlement boundaries to make provision for a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer-term need for development land, the effects of development pressures in areas beyond the green wedge and the need to minimise demand for travel.	
<b>LPA Recommendation</b>	It is proposed to allocate the site for 100 dwellings with site specific policy requirements set out in Policy HA5 Land at Penlanlas Farm, Abergavenny.	
<b>Chepstow</b>		
<b>Candidate Site: CSP017 Land at Bayfield, Chepstow</b>		Representor:
	<ol style="list-style-type: none"> <li>1. Support for the proposal to protect this site - the site should be protected to maintain the open field, rolling landscape which creates a visual distinction between town and the recognised AONB and ancient woodland.</li> <li>2. Concerns that development on land abutting an AONB could set a precedent for building on other sites like this and destroy what makes Monmouthshire so special.</li> </ol>	<ol style="list-style-type: none"> <li>1. 1 Private Individual</li> <li>2. 1 Private Individual</li> </ol>
<b>LPA Response</b>	Comments noted. The site is located outside the settlement boundary and is therefore considered to have sufficient protection as any proposals would be assessed against national and local policy requirements relating to open countryside locations. A site-specific protection designation is therefore not considered necessary in addition to the policy protection proposed in the Plan.	
<b>LPA Recommendation</b>	This site will not be allocated in the Deposit RLDP.	