

**SUBJECT: DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP)
CONSULTATION REPORT**

MEETING: PLACE SCRUTINY COMMITTEE

DATE: 25th September 2025

DIVISION/WARDS AFFECTED: ALL

1. PURPOSE:

- 1.1 To inform Place Scrutiny Committee of the results of the public consultation/engagement on the Deposit Replacement Local Development Plan (RLDP) as set out in the Deposit RLDP Consultation Report and the subsequent proposed minor non-material amendments to the RLDP, prior to seeking Council's endorsement of the Deposit RLDP Consultation Report and the RLDP, as amended following public consultation, and associated documents to submit to Welsh Government and Planning and Environment Decision Wales (PEDW) for independent examination.
- 1.2 Place Scrutiny Committee to consider whether the Deposit RLDP Consultation Report reflects the consultation process undertaken for the Deposit RLDP.

RECOMMENDATIONS:

- 2.1 For Place Scrutiny Committee to scrutinise the content of the Deposit RLDP Consultation Report and provide any comments/observations on the Report prior to seeking Council's endorsement of the Deposit RLDP Consultation Report and the RLDP, as amended following public consultation, and associated documents to submit to Welsh Government and PEDW for independent examination.

KEY ISSUES:

Background

- 3.1 The Planning and Compulsory Purchase Act 2004 (section 62) requires all local authorities to prepare a local development plan (LDP) for their area. The Town and Country Planning (LDP) (Wales) Regulations 2005 (as amended) [hereafter the LDP Regulations] prescribes the form and content of LDPs and process to be followed for their preparation.

- 3.2 Monmouthshire County Council is preparing a Replacement Local Development Plan (RLDP) for the County which will cover 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 to provide the basis for deciding planning applications. It will cover the whole of the County except for the part within Bannau Brycheiniog National Park. The Plan is being prepared in accordance with the revised Delivery Agreement (October 2024) which sets out the timetable for Plan preparation and the approach to community consultation and engagement. When adopted, the RLDP will replace the existing adopted LDP as the statutory land use development plan for the County.
- 3.3 The RLDP has a key role in delivering the Council's objectives and addressing the core issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency, ensuring our communities are socially and economically sustainable by dressing our demographic balance by attracting a younger demographic and supporting the County's economic prosperity. It takes account of and helps deliver a range of other initiatives, including the land use elements of the Council's Economy, Employment and Skills Strategy, Local Transport Strategy and the Community and Corporate Plan by supporting the delivery of the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life.
- 3.4 The existing LDP was adopted in 2014 and covered a ten year period between 2011-2021. The adopted LDP is therefore out of date, and it is essential the LDP is replaced to safeguard the County against unacceptable development, allocate land to deliver essential affordable housing and to support economic prosperity. All of the strategic housing sites in the adopted LDP have been delivered or are currently being built out, therefore there is a lack of land and opportunity to build new homes or to deliver new employment sites. The RLDP will provide the Council with a sound development plan, which will give certainty to communities and developers up to 2033 on which land is appropriate for sustainable development.
- 3.5 The preparation of the RLDP involves key stages as shown in Figure 1 below and has progressed through a number of stages since its commencement. The Plan has recently proceeded from Deposit Plan (Stage 4) to submission stage of the RLDP process (Stage 5). At this stage, Council is considering whether to endorse Deposit RLDP Consultation Report and the Deposit RLDP, as amended following public consultation, and associated documents to submit to the Welsh Government (WG) and PEDW for independent examination.

Figure 1: Key Steps in the RLDP Process



Deposit RLDP Consultation, Engagement and Stakeholder Involvement

- 3.6 The Deposit RLDP builds on the stages and evidence undertaken up to this stage, including a small number of key post-consultation updates to the Preferred Strategy which were set out in a non-statutory report and endorsed by Council in October 2023¹. These agreed changes included the identification of a strategic site at Leasbrook in Monmouth following a change in position in relation to phosphates enabling development in the Monmouth area, the change of the strategic site allocation in Chepstow from Bayfield to the Mounon Road site and enhancing the sustainability credentials/energy efficiency of new homes to net zero carbon rather than net zero carbon ready. These changes formed the basis of the preparation of the Deposit Plan.
- 3.7 The Deposit RLDP sets out the Plan's strategy, policies, and allocations, supported by relevant background evidence. It identifies:
- Site allocations to meet identified needs.
 - Defined areas of protection.
 - Detailed policy framework including development management policies.
 - Delivery and monitoring mechanisms.
- 3.8 The Deposit Plan was subject to an Integrated Sustainability Appraisal (ISA) incorporating Strategic Environmental Assessment (SEA), Well-being of Future Generations Assessment (WBFGA), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA) and Welsh Language Impact Assessment (WLIA), and a Habitats Regulations Assessment (HRA). The ISA and HRA are iterative processes, with assessments undertaken at the relevant stages of the RLDP process, including Deposit, and are updated as the Plan progresses towards adoption.

¹ Full details of the post-consultation changes to the Preferred Strategy are set out in the Council Report <https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=143&MId=5410>

- 3.9 The Deposit Plan was endorsed by Council at its meeting of 24th October 2024 to issue for statutory public consultation/engagement. In accordance with Local Development Plan Regulation 17, consultation took place over a six-week period from 4th November – 16th December 2024 whereby communities and stakeholders were invited to comment on the content of the Deposit RLDP, together with the supporting Integrated Sustainability Appraisal and Habitats Regulations Assessment. The consultation was carried out in accordance with the procedures set out in the revised Delivery Agreement Community Involvement Scheme.
- 3.10 In accordance with LDP Regulation 22(2), following the consultation on the Deposit Plan a Consultation Report has been prepared which sets out who and how we consulted/engaged with the community and stakeholders at each stage of the RLDP process up to Deposit, the responses received to the Deposit Plan consultation and the Council's consideration of these representations. The Deposit RLDP Consultation Report is attached at **Appendix 1**.
- 3.11 A separate Representations Register has also been published, which provides a copy of the duly made representations that were received by the Council during the RLDP Deposit consultation (**Appendix 2**). This is set out in a series of volumes due to the number of representors that commented on the Deposit Plan. The Register has been published in accordance with Regulation 19 of the LDP Regulations and can be viewed on the Council's website. The register is a factual compilation of the comments received, with the necessary redactions made where relevant.
- 3.12 The various methods of consultation and engagement undertaken during the Deposit consultation proved highly effective, with 956 duly made responses received on the Deposit Plan from a range of statutory consultees, organisations, agents, community groups and private individuals. These responses resulted in over 4,000 individual representations being made on different elements of the Plan. A breakdown of the number of representations by RLDP policy/section is set out in Appendix 11 of the Consultation Report and a high-level summary of the key themes raised through the consultation is provided below.
- **RLDP Growth Strategy:** this focussed on two opposing views. The first noting that the growth level is too high and in excess of the housing target specified by Welsh Government in response to the 2021 Preferred Strategy and the second view noting that the growth level is too low to sufficiently address the RLDP's core issues and objectives.
 - **RLDP Spatial Strategy:** there was some support for the spatial strategy and recognition that growth is primarily focused in the County's Primary Settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including Severnside). Concerns were raised, however, that

a disproportionate amount of growth is focussed on the south of the County.

- **Reliance on two Large Strategic Sites in Abergavenny and Caldicot/Portskewett:** concerns were raised at the over reliance of two strategic sites allocated under policies HA1 – Land to the east of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, and the impact this will have on the delivery of the RLDP growth strategy.
- **Site Allocations:** all proposed sites allocations received objections with common concerns raised including the loss of greenfield land, ecological, highway and traffic and landscape impacts, and inadequate infrastructure provision to support the proposals. Representations in support of site allocations were, however, also received, for example the proposed site allocation on land to the East of Abergavenny (HA1) received some support in recognition of its location adjoining Abergavenny Train Station and the sustainable transport options that this provides.
- **Alternative Sites:** A series of candidate sites were suggested as alternatives to the proposed site allocations, usually by site promoters pursuing the allocation of a different site or residents suggesting a different site to that allocated.
- **Affordable Homes:** General support was provided for the need for additional affordable housing, with many supporting the 50% affordable housing policy requirement. However, others questioned the need for this level and suggested that this be reduced to the levels contained in the Adopted Local Development Plan.
- **Climate Change and Net Zero Homes:** the Council's climate change and net zero homes policy requirements were generally welcomed. However, concerns were expressed regarding the potential conflict between the policy objectives and the loss of greenfield land through the allocation of sites. Concerns were also raised in relation to the implementation of the Net Zero Homes policy and ongoing monitoring arrangements.
- **Viability:** Whilst there was support for the Council's 50% affordable housing requirement, concerns were raised regarding the impact this policy requirement together with other key requirements including net zero homes, would have on viability.
- **Employment and Economy:** views noted that the RLDP's job figure is optimistic, with concerns raised in relation to how it will be achieved. Clarification was also sought on how the employment land figure was arrived at, as well as concerns raised in relation to the lack of employment land allocated in Abergavenny and the disproportionate amount allocated in Raglan.
- **Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA):** Comments on the ISA primarily focussed on the assessment of alternative sites, suggesting that alternative scores

should have been applied. With regards to the HRA, Natural Resources Wales (NRW) raised concerns regarding the robustness of the assessment of the potential loss of functionally linked land relating to the Wye Valley and Forest of Dean Bat SAC.

- 3.13 A detailed summary of the key issues raised, structured around the main policy areas of the RLDP in Plan order, together with the Council's response is set out in Section 8 of the Consultation Report. Individual responses to all duly made representations received are provided in Appendix 12 of the Consultation Report - Deposit RLDP Representation Responses which are issued by volume due to the significant number of representations received.
- 3.14 Following the Deposit Plan consultation, a number of minor amendments to the Deposit RLDP are proposed. These amendments relate to matters such as formatting and grammar, factual corrections and minor updates/amendments to policies and supporting text for consistency and/or clarification. All of the amendments are considered to be minor and non-material in nature and, as a result, no focused changes to the RLDP are proposed. These amendments are set out in the Schedule of Minor Changes to the Deposit RLDP (**Appendix 3**) and are shown as track changes in the amended version of the Deposit RLDP and Proposals Map (**Appendix 4**).
- 3.15 A number of minor amendments to some of the RLDP background documents are also following the consultation and are set out in the Schedule of Minor Changes to the Deposit RLDP. Again, these amendments relate to matters such as formatting and grammar, points of clarification and factual updates/corrections. Of note, an Addendum to the Deposit Plan Habitats Regulations Assessment has been prepared in response to comments received from Natural Resources Wales (NRW) and is attached at **Appendix 6**. The updated ISA (amended to reflect a factual update) is attached at **Appendix 5**.

Next Steps

- 3.16 Feedback from the Place Scrutiny Committee will be reported to Council on 23rd October 2025. If Council endorses the Deposit RLDP Consultation Report and the Deposit RLDP, as amended, the RLDP and associated documents will be submitted to Welsh Government and PEDW for independent examination by a planning inspector.
- 3.17 Following the examination, the Inspector will issue a report recommending any required changes to the RLDP. If the Inspector considers the Plan is fundamentally unsound it will not be recommended for adoption. Once adopted, the RLDP will replace the existing LDP adopted and will become the framework against which decisions on planning applications are made until 2033.

4. EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIALJUSTICE, SAFEGUARDING AND CORPORATE PARENTING):

- 4.1 The Planning and Compulsory Purchase Act (2004) sets out the requirement for all LDPs to be subject to a Sustainability Appraisal (SA). All stages of the RLDP are subject to an Integrated Sustainability Assessment (ISA) (including Strategic Environmental Assessment (SEA), Well-being of Future Generations (WBFG), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA), and Welsh Language Impact Assessment (WLIA)). The ISA Report is attached in **Appendix 5**. The ISA findings have informed the Deposit RLDP including the detailed policies and site allocations in the plan, in order to ensure that the Plan promotes sustainable development.
- 4.2 An Equality and Future Generations Evaluation (including equalities and sustainability impact assessment) is attached to this report at **Appendix 7**.

Safeguarding and Corporate Parenting

- 4.3 There are no safeguarding or corporate parenting implications arising directly from this report. The RLDP will provide affordable homes, the delivery and allocation of which should be cognisant of the needs of children leaving care.

Socio-economic Duty

- 4.4 The RLDP seeks to tackle inequality, specifically by seeking to address house price unaffordability, which currently prevents some of our communities accessing suitable homes within the County. This is likely to benefit younger people, who in turn will make our ageing communities more socially and economically balanced and more sustainable. Good quality and affordable homes are important in achieving poverty reduction and equitable prosperity and supporting the best start in life. Good spatial planning helps to build cohesive communities. The provision of affordable homes combined with policy interventions in relation to the requirement of a mix of market housing will increase opportunities for those in poverty to access safe, secure and suitable homes. In accordance with the WBFGA, the RLDP also seeks to prevent future problems and will therefore continue to avoid new development in flood risk areas and will ensure the delivery of net zero carbon homes to help address the climate and nature emergency and also tackle issues such as fuel poverty.

5. OPTIONS APPRAISAL

Deposit RLDP Consultation Report

Option	Benefit	Risk	Comment
Place Scrutiny Committee to scrutinise the content of the Deposit RLDP Consultation Report and comment accordingly, prior to seeking Council's endorsement of the Consultation Report and the RLDP, as amended following public consultation, and associated documents to submit to Welsh Government and PEDW for independent examination.	This provides the Place Scrutiny Committee with the opportunity to scrutinise the content of the Deposit RLDP Consultation Report and comment accordingly. Any feedback received will be noted and reported to Council on 23 rd October 2025.		<p>This is the preferred option.</p> <p>The Deposit RLDP Consultation Report, as drafted, is considered to effectively capture the consultation and engagement undertaken throughout the RLDP preparation process, including the Deposit RLDP. The Report documents the consultation and engagement methods used during the Deposit consultation process and clearly sets out the Council's consideration of all duly made representations received on the Deposit RLDP.</p>
Place Scrutiny Committee do not scrutinise/ comment on the Deposit RLDP Consultation Report.		The option of not scrutinising/ commenting on the Deposit RLDP Consultation Report would result in the Place Scrutiny Committee missing a key opportunity to provide feedback on this report prior to it being considered at Council on 23 rd October 2025.	The option of not commenting on the Deposit RLDP Consultation Report would result in the Place Scrutiny Committee missing a key opportunity to provide feedback on this report and should, therefore, be discounted.

6. RESOURCE IMPLICATIONS

- 6.1 Officer and consultant time and costs associated with the preparation of the RLDP will be met from the Planning Policy budget and existing LDP reserve.

7. CONSULTEES

- Cabinet Member for Planning and Economic Development & Deputy Leader
- SLT
- Business Cabinet

8. BACKGROUND PAPERS

Include:

- Monmouthshire Deposit RLDP (October 2024)
- Monmouthshire RLDP Integrated Sustainability Appraisal (ISA) for the Deposit RLDP; Monmouthshire RLDP ISA Report Non-Technical Summary; Monmouthshire RLDP ISA Technical Annex Candidate Sites (AECOM, September 2024).
- HRA of the Monmouthshire RLDP Deposit Plan (AECOM, September 2024)
- RLDP Delivery Agreement (Revised October 2024)

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APPENDICES:

APPENDIX 1: Monmouthshire Deposit Replacement Local Development Plan (RLDP) Consultation Report (October 2025)

APPENDIX 2: Deposit RLDP Representations Register (October 2025)

APPENDIX 3: Schedule of Minor Changes to the Deposit RLDP (October 2025)

APPENDIX 4: Monmouthshire Deposit RLDP (as Amended/Track Changes Version) (October 2025)

APPENDIX 5: Monmouthshire RLDP Integrated Sustainability Appraisal (ISA) Report; Monmouthshire RLDP ISA Report Non-Technical Summary; Monmouthshire RLDP ISA Technical Annex Candidate Sites (AECOM, updated September 2025).

**APPENDIX 6: Habitats Regulations Assessment (HRA) of the Monmouthshire Deposit RLDP (AECOM, September 2024).
Addendum to the Habitats Regulations Assessment (HRA) of the Monmouthshire RLDP: Impacts on Wye Valley and Forest of Dean Bat Sites SAC (AECOM, March 2025)**

APPENDIX 7: Equality and Future Generations Evaluation