



# Monmouthshire Replacement Local Development Plan

2018-2033

## Appendix 1 - Deposit RLDP Consultation Report

October 2025



monmouthshire  
sir fynwy

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## Consultation Report: Deposit RLDP

### 1. Background and Introduction

- 1.1. 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) prescribes the form and content of LDPs and process to be followed for their preparation.
- 1.2. Monmouthshire County 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.
- 1.3. The preparation of the RLDP involves a number of key stages as shown in Figure 1 and has proceeded to submission stage. 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.

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



- 1.4. The RLDP has evolved through a number of key plan stages since commencement in 2018. Several challenges have arisen during the plan preparation period which have affected progress and required further consideration at the relevant stage. These challenges include the publication of updated Welsh Government based population projections, the Covid 19 pandemic, an objection from Welsh Government to the June 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk catchment areas. These challenges have resulted in a number of stages being revisited, with several iterations of documents being published for consultation. This report sets out details of each stage by LDP Regulation and discusses the background to the documents prepared and revisited relevant to that stage. An overview, however, of each key stage up to the Deposit stage in chronological order is set out in Appendix 1. This provides an audit trail of the sequence of events related to the progression of the RLDP.
- 1.5. The Deposit RLDP was subject to public consultation from 4th November to 16th December 2024, in accordance with the revised Delivery Agreement and LDP Regulation 17. This Report sets out who and how we engaged with the community and stakeholders at each stage of the RLDP plan process, up to Deposit. Details of

the 2022 Preferred Strategy stage are, however, expanded upon in the Initial Consultation Report, which was prepared in accordance with LDP Regulation 16A. This Consultation Report has been prepared in accordance with LDP Regulation 22(2) and guidance set out in the Development Plans Manual.

- 1.6. In accordance with LDP Regulation 22(2) this report:
  - Identifies the bodies engaged and consulted and number of representations received at pre-deposit and deposit stage.
  - Sets out the steps taken to publicise /engage throughout the RLDP preparation process.
  - Summarises the main issues raised at pre-deposit and deposit stage and how the main issues have been addressed in the RLDP.
  - Recommends how the Council considers each representation at Deposit stage should be addressed.
- 1.7. This Consultation Report clearly sets out the Council's consideration of all duly made representations received on the Deposit RLDP.

### **Structure of this Document**

- 1.8. The report provides an overview of the consultation methods, including who and how we engaged/consulted, at key stages of the RLDP process, including:
  - Delivery Agreement (LDP Regulation 9)
  - Call for Candidate Sites (LDP Regulation 14)
  - Pre-Deposit Participation (LDP Regulation 14)
  - Preferred Strategy Consultation (LDP Regulation 15)
  - Candidate Site Register Consultation (LDP Regulation 15)
  - Deposit Consultation (LDP Regulation 17)
- 1.9. Section 8 of the report provides a summary of the main issues raised to the Deposit Plan consultation. Full details of each duly made representation and the Council's response are provided in a series of separate documents reflecting the volume of representations received in relation to the Deposit Plan.
- 1.10. 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. Again, 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 Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 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.

### **Integrated Sustainability Assessment**

- 1.11. All formal stages of the RLDP are subject to an Integrated Sustainability Assessment (ISA) which fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-Being of Future Generations (WBFG). The role of the Sustainability Appraisal is to assess the extent to which the emerging policies will help achieve the wider environmental, economic, social and cultural objectives of the Replacement Local Development Plan (RLDP).

- 1.12. The first stage in the ISA process is the preparation of Sustainability Scoping Report which sets out the sustainability appraisal issues and objectives/criteria against which the RLDP strategy, policies and proposals will be assessed, and includes a review of the plans, programmes, strategies and policies relevant to the RLDP and a review of the environmental, social and economic baseline characteristics of the County, which are updated throughout the Plan preparation process. The Scoping Report was issued for targeted consultation for a five-week period from 26<sup>th</sup> October 2018 – 30<sup>th</sup> November 2018. The post consultation report was agreed on 16<sup>th</sup> January 2019 by Individual Cabinet Member.
- 1.13. The ISA procedure is an iterative process, with assessments undertaken at the relevant Preferred Strategy stages and Deposit Stage. The ISA reports have been published for formal consultation alongside the Preferred Strategies and Deposit Plan, with consultation and engagement details set out throughout this report.

#### **Habitats Regulations Assessment**

- 1.14. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the RLDP. The HRA must determine the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance and if applicable, scope what needs ‘appropriate assessment’.
- 1.15. Again, the HRA is prepared alongside the RLDP and as an integrated and iterative process. The Initial Screening Report is the first stage of the process and involves identifying and agreeing a list of European sites to take forward in consideration of the potential for likely significant effects to arise as a result of the RLDP. The draft HRA Initial Screening Report was issued for targeted consultation for a five-week period from 26<sup>th</sup> October 2018 to 30<sup>th</sup> November 2018 and subsequently agreed on 16<sup>th</sup> January 2019 by Individual Cabinet Member. Reflecting the requirements of the Habitats Regulations, iterative HRA Reports accompanied the Preferred Strategies and Deposit Plan and were subject to the same consultation arrangements.

## 2. Delivery Agreement (LDP Regulation 9)

- 2.1. The first requirement of the Replacement Local Development Plan process is the preparation of a Delivery Agreement (DA). It provides the timetable for the preparation of the Plan and includes a Community Involvement Scheme (CIS), which details how and when the Council will consult and engage with groups, organisations and individuals during the Plan's preparatory process.
- 2.2. A report was presented to Council on 19<sup>th</sup> March 2018 seeking approval to undertake targeted consultation on the initial draft DA for a four-week period from 21<sup>st</sup> March to 18<sup>th</sup> April 2018. The draft document was sent to 74 statutory consultees, including the Welsh Government, Natural Resources Wales, all Town and Community Councils in Monmouthshire, and neighbouring Local Authorities. Responses were received from six external parties, resulting in nine individual representations which were individually summarised, together with the Council's draft response in a Report of Consultation, and reported to Council on 10<sup>th</sup> May 2018. The DA was subsequently agreed with Welsh Government on 14<sup>th</sup> May 2018, with the final Delivery Agreement published in the May 2018.
- 2.3. In accordance with Welsh Government advice there is no requirement to consult on subsequent revisions to the initial DA, with details of set out below:

| Delivery Agreement Revisions          | Details  |
|---------------------------------------|--|
| Initial Delivery Agreement – May 2018 | Establishes timetable for key stages of the plan preparation and approach to community engagement. Agreed by Welsh Government on 14 <sup>th</sup> May 2018.  |
| First Revision – March 2020           | Amended to reflect the delays incurred up to the Preferred Strategy stage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work. The Revised Delivery Agreement was approved by Council on 5 <sup>th</sup> March 2020 and agreed by Welsh Government on 6 <sup>th</sup> March 2020. |
| Second Revision – October 2020        | Updated to reflect unavoidable delays relating to the Covid-19 pandemic, the review of the Issues, Vision, Objectives and Evidence Base, and publication of 2018-based population projections. The Revised DA was reported to Council on 22 <sup>nd</sup> October 2020. The CIS was also reviewed and adjusted in line with the Coronavirus Regulations (2020) and Ministerial advice to reflect social  |

|                                   |  |
|-----------------------------------|--|
|                                   | distancing and other measures. The revised DA was agreed with the Welsh Government on the 30 <sup>th</sup> October 2020.   |
| Third Revision –<br>December 2022 | <p>Updated to reflect revised timescales following the decision to embark on a new Preferred Strategy following an objection from Welsh Government to the July 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk Catchment areas.</p> <p>The Revised DA was agreed by Council on 1<sup>st</sup> December 2022 and agreed with Welsh Government on the 2<sup>nd</sup> December 2022.</p> |
| Fourth Revision –<br>October 2024 | <p>Updated to reflect impacts on the publication of the Deposit RLDP due to the timing of a UK General Election. The Revised DA was agreed by Council on 24<sup>th</sup> October 2024 and agreed with the Welsh Government on 25<sup>th</sup> October 2024.</p>  |

### 3. Call for Candidate Sites (Regulation 14)

- 3.1. As part of the plan preparation process, the Council invited landowners, developers and the public to put forward candidate sites to be considered for development, redevelopment or protection in the RLDP. This was undertaken as part of a two-staged process details of which are set out in the Candidate Site Methodology.
- 3.2. Stage one involved an Initial Call for Candidate Sites, which took place for a sixteen-week period from 30<sup>th</sup> July to 19<sup>th</sup> November 2018. Letters and emails were sent to all those on the Planning Policy database, including statutory bodies, organisations, agents and private individuals, and forms were made available in the Council's Community Hubs, One Stop Shop and public libraries. The Council also offered a Candidate Site Advice service, with 34 Candidate Site Advice meetings held with site promoters.
- 3.3. In response to the initial call, 220 Candidate Sites were submitted by landowners, agents and developers for a range of uses, including residential, employment and recreation uses, as well as for protection. All sites were compiled into a Candidate Site Register which was available to view on the Council's website and in County Hall, Usk.
- 3.4. A Second Call for Candidate Sites commenced on 9<sup>th</sup> March 2020 due to run for a twelve-week period to 3<sup>rd</sup> June 2020. Letters and emails were sent to approximately 1,000 representors on the Planning Policy database, including those who submitted a site during the Initial Call. Forms and guidance notes were made available in the Council's Community Hubs, One Stop Shop and public libraries and on the Council's website. However, due to the Covid-19 pandemic and advice from the Minister of Housing and Local Government, the decision was made to cease the Second Call for Candidate Sites on 20<sup>th</sup> July 2020. A notice of cessation was sent to the statutory consultees and other consultees on the Council's consultation database and placed on the Council's website advising of this decision.
- 3.5. A Second Call for Candidate Sites then took place alongside the 2021 Preferred Strategy consultation for an eight-week period from 5<sup>th</sup> July to 31<sup>st</sup> July 2021. Letters/emails were sent to approximately 1,000 consultees on the Planning Policy database, including all of those who submitted a site during the Initial Call. Forms and various guidance notes to support the submission of sites were made available in the Council's Community Hubs, One Stop Shop and public libraries and on the Council's website. The Second Call for Candidate Sites generated 159 candidate site submissions for development/redevelopment for a range of uses, including residential, employment and recreation uses. A total of 20 candidate sites for protection were submitted during both the calls for sites. Candidate sites submitted for protection during the Initial Call were logged in the register to be given further consideration as part of the Deposit Plan.
- 3.6. All sites submitted during the Second Call for Candidate Sites were published in a Candidate Sites Register, which updated and replaced the register published following the Initial Call for Candidate Sites. Sites that were not resubmitted following the Initial Call for Candidate Sites were not included in the updated Register. Emails and letters were sent to stakeholders on the RLDP consultation database on the 10<sup>th</sup> February 2022, notifying of the publication of the Candidate Site Register on the Council's website, noting that it was for informative purposes only at that time.



- 3.7. An update to the Candidate Sites Register was made following the 2022 Preferred Strategy consultation stage and was available to comment on at the Deposit consultation stage. The update included previously filtered out sites due to their location within the River Wye Valley phosphate catchment area, following Welsh Government's advice that new site allocations should be made in Monmouth on the basis that sufficient certainty was provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31<sup>st</sup> March 2025. Consequently, candidate sites within the River Wye Valley catchment area that were previously filtered out were added to the Candidate Site Register. A further amendment was made to include the submission of CS0293- Abergavenny East 2, which was submitted during the 2022 Preferred Strategy Consultation.
- 3.8. A Phosphate Briefing Update was sent out the week commencing 24<sup>th</sup> July 2023 to inform Members and all stakeholders on the RLDP consultation database of the updated approach to the environmental issue of water quality in the Rivers Wye and Usk and the implications for the RLDP and planning applications. The email advised that the Candidate Sites Register had been updated to reflect the changes noted above and that there would be an opportunity to comment at Deposit Plan stage.
- 3.9. The updated Candidate Site Register is available to view on the Council's website.

## 4. Pre-Deposit Participation (LDP Regulation 14)

- 4.1. LDP Regulation 14 states that, before complying with Regulation 15 (relating to Pre-Deposit Proposals), an LPA must, as it considers appropriate, engage specific and general consultation bodies for the purpose of generating alternative strategies and options. This stage in the Plan process involved the preparation of two documents:
- **Issues, Vision and Objectives:** this identifies the key issues, challenges and drivers facing the County, setting out the vision and objectives for the RLDP.
  - **Growth and Spatial Options:** this sets out a number of alternative growth and spatial options for the RLDP having regard to the Plan's evidence base and policy aspirations.
- 4.2. There is no statutory requirement for the Council to carry out public consultation at this stage. However, a series of consultation and engagement methods were undertaken in relation to each document as considered appropriate. Reflecting the challenges and changing circumstances experienced in preparing the RLDP, both pre-deposit documents have been amended and consulted upon a number of times, resulting in a number of iterations, with details of each set out below.

### Issues, Vision and Objectives

- 4.3. The identification of the issues and proposed vision and objectives were heavily drawn from/reflect the Public Service Board (PSB) Well-being Plan which was extensively consulted on in 2017 and resulted in contributions from more than 1,400 people. This approach reflects Welsh Government guidance which recognises the significance of local well-being plans as a key evidence source for LDPs. In view of this, and given the non-statutory status of the Issues, Vision and Objective stage of the RLDP process, it was not considered necessary to undertake a full public consultation exercise on this initial stage of the plan preparation process. Discussions on the draft Issues, Vision and Objectives were Member focussed, through an Economy and Development Select Committee workshop and a series of Area Committee and Cluster meetings as set out below.

### Issues, Vision and Objectives Non-Statutory Consultation January/ February 2019

Non-statutory engagement and consultation on the draft Issues, Vision and Objectives Report took place via:

- Workshop at Economy & Development Select Committee on 22<sup>nd</sup> January 2019 to which all Members were invited.
- Area Committee & Area Cluster meetings:
  - Lower Wye Area Committee – 23<sup>rd</sup> January 2019
  - Severnside Area Committee – 23<sup>rd</sup> January 2019
  - North Monmouthshire Area Committee – 30<sup>th</sup> January 2019
  - Central Monmouthshire Area Committee – 30<sup>th</sup> January 2019
- Report to Economy and Development Select Committee- 14<sup>th</sup> February 2019 to inform on the consultation feedback received to date, to seek further

feedback from the Committee, and seek endorsement of the Draft Issues, Vision and Objectives Paper.

- 4.4. A summary of the feedback received, together with the Council's draft response was reported to Cabinet on 5<sup>th</sup> June 2019. The feedback received covered a range of topic areas including population, economic growth, housing and affordable housing, economy and employment, and climate change.
- 4.5. The Issues, Vision and Objectives Paper was amended with some minor changes to reflect the feedback received from the targeted engagement and endorsed by Cabinet on 5<sup>th</sup> June 2019.
- 4.6. It was noted at the time that the vision and objectives will continue to be refined prior to inclusion in the Preferred Strategy to reflect the outcomes of further stakeholder engagement / consultation in relation to the growth and spatial options and a revised evidence base. The spatial element of the Vision was also to be determined following consultation to take place on the LDP growth and spatial options and set out in the Preferred Strategy.
- 4.7. Subsequent to the 5<sup>th</sup> June 2019 Cabinet meeting, the Council declared a climate emergency on 16<sup>th</sup> May 2019. It was therefore considered necessary to make further amendments to the Issues, Vision and Objectives Paper to reflect this decision, with greater emphasis given to climate change, and consolidate the changes agreed at the 5<sup>th</sup> June Cabinet meeting. Amendments were also considered necessary to set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. These were reported and agreed by Cabinet on 3<sup>rd</sup> July 2019.
- 4.8. The Issues, Vision and Objectives paper was updated again in March 2020 to add the spatial element of the Vision associated with the 2020 Preferred Strategy. A further review was then undertaken in June 2020 to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic, the findings of which were reported to Cabinet in its meeting of 17<sup>th</sup> June 2020. Following the publication of a letter from the Minister of Housing and Local Government on 7<sup>th</sup> July 2020, an assessment of the RLDP evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic was undertaken. For completeness, the review incorporated the assessment of the RLDP Issues, Vision and Objectives that was undertaken in June 2020. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Council at its meeting of 22<sup>nd</sup> October 2020.
- 4.9. Minor updates were made to the Issues, Vision and Objectives Paper in December 2022, as part of the Preferred Strategy consultation that took place in December 2022 and again in September 2024, as part of the preparation for the Deposit.
- 4.10. A summary of these events is set out below.

| Issues, Vision and Objectives (IVO) Revisions   | Details  |
|---|--|
| IVOs Consultation Draft                         | Member focussed consultation reflecting that the issues and proposed vision and objectives were heavily drawn from/reflect the Public Service Board (PSB) Well-being Plan which was extensively consulted on in 2017. Amended with some minor changes to reflect the feedback received from the targeted engagement and endorsed by Cabinet on 5 <sup>th</sup> June 2019   |
| Reviewed and amended July 2019                  | Updated to reflect the Council's declaration of a climate emergency in May 2019 and set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. Reported and agreed by Cabinet on 3rd July 2019.   |
| Updated March 2020                              | Amendment of Vision to include the spatial element associated with the 2020 Preferred Strategy.  |
| Review undertaken in June 2020 and October 2020 | A review was undertaken in June 2020 and again in July 2020 following the publication of a letter from the Minister of Housing and Local Government (7 <sup>th</sup> July 2020) to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Cabinet on 17 <sup>th</sup> June 2020 and Council on 22 <sup>nd</sup> October 2020. |
| Updated December 2022                           | Minor updates made in December 2022, as part of the Preferred Strategy consultation that took place in December 2022.  |
| Updated September 2024                          | Minor updates undertaken as part of the preparation of the Deposit Plan.   |

## Growth and Spatial Options

- 4.11. A number of Growth and Spatial Options Papers were published for consultation over the course of the plan preparation process to reach the Deposit stage. These are discussed in turn below.

### Growth and Spatial Options 2019

- 4.12. The Growth and Spatial Options Paper 2019 sets out a number of alternative growth and spatial strategy options for consideration as part of the RLDP. The growth options sections of the 2019 Paper, reflecting the findings of the Edge Analytic Report (2018), set out a range of demographic, housing and employment growth scenarios, based on the Welsh Government 2014 based population and household projections. The Paper presented a number of alternative low, mid and high growth options for consultation purposes (8 options altogether). Consideration was also given to spatial strategy options in terms of broadly where this growth should take place within the County, with five broad spatial strategy options proposed for consultation. The 2019 Growth and Spatial Options Paper was endorsed by the Economy and Development Select Committee on 17<sup>th</sup> July 2019 and endorsed for non-statutory consultation at the 3<sup>rd</sup> July 2019 Cabinet meeting.
- 4.13. The Growth and Spatial Options Paper (2019) was issued for non-statutory public consultation for a four-week period between 8<sup>th</sup> July 2019 and 5<sup>th</sup> August 2019. Details of which are set out below.

#### Growth and Spatial Options 2019 Non-Statutory Consultation 8<sup>th</sup> July – 5<sup>th</sup> August 2019

- Copies of the Growth and Spatial Options Consultation Report, Easy Read Guide and Executive Summary were available at County Hall, Usk, the Council's Community Hubs, One Stop Shop and public libraries and also on the Council's website.
- An animation was also available to view on the Council's website to explain key stages of the RLDP process in an accessible and easy to understand way with the aim of encouraging wider engagement with the communities.
- Notification of the consultation, inviting comments, was sent to the statutory consultees and approximately 500 other consultees, agents and individuals on the RLDP consultation database.
- Engagement and consultation also took place via the following:
  - Planning Policy Officer attendance at Area Committee and Area Cluster meetings during July 2019.
  - Attendance at the Youth Forum on 5<sup>th</sup> July 2019.
  - A Members' Workshop on 11<sup>th</sup> July 2019 (hosted by the Economy & Development Select Committee).
  - LDP Growth and Spatial Options community engagement event on 16<sup>th</sup> July 2019 at County Hall, Usk between 13:00 and 19:00 which was open for all to attend.
  - Scrutiny by Economy & Development Select Committee on 17<sup>th</sup> July 2019.
  - Abergavenny Town Council hosted a meeting/workshop on Thursday 1<sup>st</sup> August 2019.

- Internal discussions within the Council through Departmental Management Team/Senior Leadership Team.

- 4.14. In response to the non-statutory consultation and engagement a total of 93 responses were received, which were considered and reported in the Growth and Spatial Options Report of Consultation (March 2020) and helped to inform the preparation of the Preferred Strategy (March 2020). The Growth and Spatial Options Background Paper (March 2020) complements the Report of Consultation and adds further analysis of the options considered, including the extent to which they achieve the RLDP objectives and their performance against the Initial Sustainability Appraisal (ISA) themes.
- 4.15. In light of the consultation responses received on the Growth and Spatial Options Consultation Paper (June 2019), informal feedback from Welsh Government officials, receipt of a letter from the Minister for Housing and Local Government (July 2019), which seeks to promote sites that include 50% affordable housing, and the Council's further consideration of the County's key issues/challenges and options, a decision was taken to model two additional growth scenarios, referred to as Option 5a and Option 5A+. Similarly, following consideration of the consultation responses received on the spatial options, and the publication of the draft National Development Framework (NDF), which identifies the potential for a green belt in the south/mid of the County, a decision was taken to assess a further spatial option which focuses growth in the north of the County (referred to as Option 6). A further spatial option emerged to reflect the preferred growth option (growth option 5A+), to deliver growth proportionately across the most sustainable urban and rural settlements and distribute growth by housing market area to reflect the need for intermediate affordable housing.
- 4.16. As the additional growth and spatial options emerged as a result of the consultation undertaken in 2019, these are not discussed in the Report of Consultation. Further details on the methodology and analysis of the additional growth and spatial scenarios were, however, set out in the Growth and Spatial Options Background Paper (March 2020) and considered as options in the preparation of the 2020 Preferred Strategy.

#### **Growth and Spatial Options – December 2020**

- 4.17. In March 2020, the RLDP process had reached the Preferred Strategy stage, with formal consultation commencing on 5<sup>th</sup> March 2020, based on the outcome of the 2019 Growth and Spatial Options consultation. However, progress on the RLDP was subsequently paused in March 2020 due to the Covid-19 pandemic. During this pause in the plan process, Welsh Government published a correction to the 2018-based population and household projections in August 2020. The Welsh Government population and household projections form the starting point for the RLDP evidence on growth levels, onto which policy choices can be added as needed, for example to ensure that the County's identified issues are addressed, objectives met, and vision achieved. The publication of the Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP was robust and

based on the most up to date information. Consequently, the Growth and Spatial Options stage of the Plan process was revisited in 2020.

- 4.18. The 2020 Growth and Spatial Options Paper considers the 2018-based projections, as well as factoring in a specific policy-led affordable housing element added to all selected growth options reflecting the affordable housing need set out in the 2020 Monmouthshire Local Housing Market Assessment (LHMA). Six alternative growth options were selected for non-statutory consultation to assist in determining the housing and employment requirements of the RLDP. Similarly, a review of the spatial options was undertaken, with two previous options involving the creation of a new settlement discounted and an additional option, which focused growth in the North of the County was included as an option, reflecting the results of the 2019 consultation discussed above.
- 4.19. The Paper specified growth option 5 – population-led with added policy assumptions, and spatial option 2 – distribute growth proportionately across the County’s most sustainable settlements, as the preferred growth and spatial options.
- 4.20. The revisited Growth and Spatial Options Paper, along with an Easy Read version, was endorsed for non-statutory public consultation at the Cabinet meeting on 16<sup>th</sup> December 2020. The consultation took place over a 4-week period between January and February 2021, with consultation arrangements set out below.

#### **Growth and Spatial Options Paper 2020 Non-Statutory Consultation – January/February 2021**

- Consultation and engagement arrangements undertaken were revised in light of the Covid-19 pandemic and reflected the Coronavirus Regulations (2020) and Ministerial advice.
- Copies of the consultation documents were available to view at County Hall, Usk via a pre-booked browsing service and during the opening hours of all Community Hubs.
- Notifying all parties on the RLDP database of the consultation (49 letters and 714 emails notifications were sent).
- Consultation was publicised via corporate social media as well as Planning Policy’s social media account.
- Making all relevant information available on the Council’s website including an Easy Read version and an animation to explain the different options.
- A Members’ Workshop – 8<sup>th</sup> December 2020 (hosted by the Economy & Development Select Committee).
- Scrutiny by Economy & Development Select Committee on 10<sup>th</sup> December 2020.
- Two consultation webinars open to all to attend:
  - 14<sup>th</sup> January, 6pm (84 views in total – 69 live and 14 via the recorded link)
  - 20<sup>th</sup> January 2021, 2pm (87 views – 82 live and 5 viewed via the recorded link)
- Planning Policy Officer virtual attendance at the Town and Community Council Engagement Meeting – 21<sup>st</sup> January 2021.
- Internal discussions within the Council through Departmental Management Team (DMT) and Senior Leadership Team (SLT).

- 4.21. As a result of the non-statutory consultation and engagement a total of 105 responses were received. These were summarised and grouped by the growth and spatial option they relate to, with a Council response to each general theme of comments submitted, reflecting the strategic nature of the non-statutory consultation stage. Full details were set out in the Growth and Spatial Options Report of Consultation (June 2021) and the Growth and Spatial Options Background Paper (June 2021) which complements the earlier Report of Consultation and adds further analysis of the options considered, including the extent to which they achieve the RLDP objectives and their performance against the Initial Sustainability Appraisal (ISA) themes. Following the consideration of the findings of the 2021 Growth and Spatial Options consultation, a Preferred Strategy was approved for consultation in June 2021.

#### **RLDP Options Council Report September 2022**

- 4.22. On the 10<sup>th</sup> February 2022, an informative email/letter was sent to stakeholders on the RLDP consultation database, providing an update on the RLDP. The email/letter informed stakeholders that the Council was considering the implications of the Welsh Government Planning Division's proposed prescribed maximum growth level on the RLDP's objectives. It advised that a future report to Council in late summer 2022 would present options for progressing the RLDP and would seek a Council decision on how to proceed.
- 4.23. Following consultation on the 2021 Preferred Strategy, a report was taken to Council on 27<sup>th</sup> September 2022, seeking endorsement of the proposed way of progressing the RLDP, having regard to a number of challenges that arose and impacted on the progression of the RLDP. In summary, these involved a Welsh Government objection to the level of growth proposed in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk catchment areas.
- 4.24. The RLDP Options Report considered how to progress the RLDP having regard to the above challenges, whilst also ensuring the RLDP delivers on the Council's and RLDP objectives. The Report considered 4 options:
- Option 1: Proceed with the 2021 Preferred Strategy based on a housing requirement of 7,605 homes increasing to 8,366 homes including a 10% flexibility allowance and spatial strategy to distribute growth proportionately across the County's most sustainable settlements.
  - Option 2: Proceed with an amended approach based on a demographic-led strategy and an amended spatial strategy to take account of the phosphate constraint in the River Wye Catchment (a solution to the River Usk catchment being known).
  - Option 3: Proceed with the Welsh Government prescribed maximum dwelling requirement of 4,280 homes increasing to 4,700 including a 10% flexibility allowance, combined with an amended spatial strategy to consider the phosphate constraint in the River Wye Catchment.
  - Option 4: Restart the RLDP process.
- 4.25. A detailed options appraisal of the four options was undertaken and was attached to both the Council Report and the Growth and Spatial Options Paper (September 2022). This sets out the demographic, dwelling and jobs growth levels associated with each option, together with the benefits and risks, including in relation to the



ability of each option to meet our objectives and address our key issues, the impact on plan preparation and deliverability of the RLDP.

- 4.26. The options appraisal concluded that Option 2 was the most appropriate option for progressing the RLDP in light of the aforementioned challenges. This was agreed by Council at its meeting of the 27<sup>th</sup> September 2022 and formed the basis of the 2022 Preferred Strategy.
- 4.27. Given the extensive consultation that had taken place on the non-statutory initial stages of the RLDP and the feedback from the 2021 Preferred Strategy consultation, consultation on the RLDP Options Report focussed on Members and senior leadership. Details are set out below.

#### **RLDP Options Council Report September 2022 Targeted Discussions**

- Informal Cabinet
- Cabinet Member for Sustainable Economy
- Communities and Place Departmental Management Team and Senior Leadership Team
- All Member Workshop – 12<sup>th</sup> September 2022
- Special Meeting of Place Scrutiny Committee – 26<sup>th</sup> September 2022
- Full Council – 27<sup>th</sup> September 2022

## 5. Preferred Strategy Consultation and Engagement (LDP Regulation 15)

- 5.1. LDP Regulation 15 requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before determining the content of its LDP for Deposit. This is the first of the statutory consultation stages, providing the strategic direction for the County, setting out how much growth is needed and the broad location of where this growth is likely to be.
- 5.2. As indicated above, three Preferred Strategy stages have taken place throughout the course of preparing the RLDP. In the interest of brevity, a summary of the first two consultation stages is set out below, with full details of the 2022 Preferred Strategy consultation provided in the Initial Consultation Report (October 2024).

### Preferred Strategy March 2020

#### Preferred Strategy March 2020 Statutory Consultation

- Consultation and engagement took place in accordance with the CIS.
- Issued for 6-week consultation 9th March – 22nd April 2020.
- 20th July 2020 – following advice from the Minister of Housing and Local Government, decision made to cease the RLDP consultation. Notice of cessation of the RLDP Preferred Strategy consultation was sent to consultees on the RLDP consultation database and publicised on the Council's website.

- 5.3. The 2020 Preferred Strategy was ceased due to the Covid-19 pandemic and as noted above in relation to the Growth and Spatial Options, in August 2020 Welsh Government published a correction to the 2018-based population and household projections. As these form the starting point of the RLDP evidence base, the Growth and Spatial Options were revisited in December 2020 and informed a revised Preferred Strategy, which was approved for consultation in June 2021.

### Preferred Strategy June 2021

#### Preferred Strategy June 2021 Statutory Consultation

- Approved by Council at its 24<sup>th</sup> June 2021 meeting for an 8-week public consultation period.
- Public consultation undertaken between 5<sup>th</sup> July 2021 and 31<sup>st</sup> August 2021.
- The Preferred Strategy, an Easy Read Guide, Executive Summary, animation and Initial Integrated Sustainability Assessment and Habitats Regulations Assessment available to view on the Council's website.
- Notification of the consultation, inviting comments, sent to the statutory and approx. 1,000 other consultees, agents, and individuals on the RLDP consultation data base.
- Copies of the RLDP Preferred Strategy, Easy Read Guide and Executive Summary available for public inspection at County Hall Usk, the Council's Community Hubs, One Stop Shop and public libraries and also on the Council's website.

- Multiple social media posts on the MCC corporate and planning policy accounts advising of the start of the consultation and publicising the upcoming community events and how to book.
- Due to the Covid-19 pandemic and associated ongoing restrictions, community engagement events were held both in person with limited numbers and mandatory booking, and virtually via Microsoft Teams.
- 7<sup>th</sup> July 2021 additional emails sent to specifically publicise the consultation events with a link to the booking form.
- The virtual community engagement events were held on:
  - 8<sup>th</sup> July 2021 (18:00-19:30pm)
  - 20<sup>th</sup> July 2021 (15:00-16:30pm)
- The community engagement events were all publicised on the Council's social media channels and were held in the following locations:
  - Usk – Sessions House on 12<sup>th</sup> July 2021
  - Chepstow – Drill Hall on 14<sup>th</sup> July 2021
  - Magor – Baptist Church 15<sup>th</sup> July 2021
  - Monmouth – Leisure Centre 19<sup>th</sup> July 2021
  - Caldicot – Choir Hall 21<sup>st</sup> July 2021
  - Abergavenny – St Mary's Priory Centre 27<sup>th</sup> July 2021
  - Raglan- Village Hall on 29<sup>th</sup> July 2021
- Engagement and consultation also took place via the following:
  - A Members' Workshop on 22<sup>nd</sup> June 2021
  - A Housing Stakeholder Group meeting on 23<sup>rd</sup> June 2021
  - A MCC department-wide officer meeting on 7<sup>th</sup> July 2021
- An interactive mapping feature ('Placecheck') also formed a part of the consultation. Whilst it was made clear that preferences cast using 'Placecheck' would not be considered as formal representations, the software was used as an informative and engaging tool and well used. The tool illustrated the potential Strategic Growth Areas on a map and users were able to cast preferences (Likes/Dislikes) on each of the potential strategic growth areas. Over 3,000 preferences were cast by nearly 1,000 users.
- 16<sup>th</sup> July members of the Monmouthshire Business Resilience Forum were emailed informing them of the on-going Consultation and the Second Call for Candidate Sites.
- 16<sup>th</sup> August – an area cluster meeting was held. All Town and Community Councils were invited to the meeting which provided the opportunity to feedback and comment on the Preferred Strategy.

5.4. In response to the 2021 Preferred Strategy, Welsh Government's Planning Division raised significant concerns regarding the proposed level of growth and the strategy's 'general conformity' with policies 1 and 33 of Future Wales. The response suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys. Welsh Government's response prescribed a maximum growth of 4,274 dwellings for Monmouthshire to 2033. This was considerably lower than the 2021 Preferred Strategy growth dwelling requirement of 7,605 homes.

5.5. In addition, in December 2020 Natural Resources Wales adopted tighter targets for water quality of the River Wye and River Usk catchment areas. NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not

deteriorate any further, with development required to demonstrate phosphate neutrality or betterment.

- 5.6. The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the 2021 Preferred Strategy directed growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was, therefore, given as to how the RLDP could progress in light of this issue. Following discussions with Dŵr Cymru Welsh Water (DCWW) and NRW, it became apparent that whilst a workable solution to this water quality issue was achievable for the Llanfoist Wastewater Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) at that time.

### **Preferred Strategy December 2022**

- 5.7. In light of the Welsh Government objection to the level of growth in the 2021 Preferred Strategy and the water quality issues in the Rivers Wye and Usk catchment areas, a revised strategy was needed. The RLDP Options Report, discussed above in the context of the Growth and Spatial Options, was therefore taken to Council on 27th September 2022, seeking endorsement of the proposed way of progressing the RLDP, having regard to the challenges that had arisen.
- 5.8. In September 2022, Council endorsed the proposal to proceed with a new growth and spatial strategy that responds to these challenges and maximises delivery of these core issues and objectives within the environmental and national policy constraints. The 2022 Preferred Strategy proposed a lower level of growth and an amended spatial strategy that responds to these challenges. Key elements of the Strategy included:
- A housing requirement of 5,400 homes, with provision for 5,940 homes including a 10% flexibility allowance.
  - Enable the provision of approximately 6,000 additional jobs.
  - Focus growth the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot (including Severnside). 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, no new site allocations were proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.
  - Identified Preferred Strategic Site Allocations in the primary settlements of Abergavenny, Chepstow and Caldicot.
  - Strategic policies establishing strategic policy objectives including 50% affordable homes on new allocations and requirement for new homes to be net zero carbon ready.
- 5.9. The 2022 Preferred Strategy was approved for consultation by Council on 1<sup>st</sup> December 2022. Full details on the consultation and engagement methods are set out in the Initial Consultation Report (October 2024) are therefore not repeated here.

### **Preferred Strategy Statutory Consultation December 2022**

Consultation and engagement on the Preferred Strategy (2022) took place between 5<sup>th</sup> December and 30<sup>th</sup> January 2023.

Consultation and engagement on the 2022 Preferred Strategy took place in accordance with the CIS, full details of which are set out in the Initial Consultation Report, which can be viewed on the Council's website.

5.10. The consultation resulted in approximately 220 responses on the Preferred Strategy. An overview of the of the key themes raised and an LPA response is set out in Appendix 1 of the Initial Consultation Report. Due to the length of the Report this information is not repeated here, with readers directed the Initial Consultation Report for full details. Of particular note to emerge from the 2022 Preferred Strategy consultation, is the following:

- Welsh Government responded to note that 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.
- Welsh Government did not object to the Preferred Strategy's settlement hierarchy and distribution of housing growth, which focused growth in the Tier 1 settlements and the Severnside cluster.
- Welsh Government 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.
- A range of comments were also made by a variety of organisations, agents and private individuals 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 was given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was also 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 was that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates to address concerns of an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.

### **Phosphates Briefing Note – July 2023**

5.11. In July 2023 a Phosphates Briefing Update was sent out to all stakeholders providing an update on the water quality issues affecting the River Wye and River Usk and that there was now firm commitment from Dŵr Cymru Welsh Water (DCWW) that the

necessary improvements would be undertaken at the Monmouth Wastewater Treatment Works (WWTW) to allow for growth in Monmouth in the RLDP. The email advised that following the removal of the constraint on the Monmouth WWTW, it was proposed that the Deposit Plan would identify a new strategic site allocation for approximately 250-300 homes and include three 'roll-over' sites in the settlement of Monmouth.

- 5.12. A Scrutiny workshop open to all Members was also held on 12<sup>th</sup> July 2023 to discuss the briefing update.

### **Preferred Strategy Post Consultation Update to Council October 2023**

- 5.13. In October 2023, in accordance with the Delivery Agreement a non-statutory report was taken to Council to seek endorsement of a small number of key post-consultation updates to the Preferred Strategy as a basis for the preparation of the Deposit Plan. Full details of the changes are discussed in the Council Report<sup>1</sup>. A summary of the changes are as follows:

- Identification of a strategic site on land at Leasbrook in Monmouth following a change in position in relation to phosphates enabling development in the Monmouth area.
- Change of the strategic site allocation in Chepstow from Bayfields to the Mounton Road site.
- An increase in the flexibility allowance from 10% to 15%.
- Enhancing the sustainability credentials/energy efficiency of new homes to net zero carbon rather than net zero carbon ready.
- Factual updates to the housing figures to take account of the 2022/23 housing monitoring data.

- 5.14. Council agreed these changes and they formed the basis of the preparation of the Deposit Plan. Reflecting the proposed changes noted above, the updated Preferred Strategy proposed:

- Provision for approximately 5,400 homes, making provision for 6,210 homes including a 15% flexibility allowance.
- Sets out the planning policy framework to enable the provision of approximately 6,240 jobs by allocating sufficient employment land and by including policies to facilitate economic growth.
- Focuses growth in the County's most sustainable settlements of Abergavenny, Caldicot (including Severnside), Chepstow and Monmouth.
- Preferred Strategic Sites identified for the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth.
- New homes to be net zero carbon.

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<sup>1</sup> <https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=143&MIId=5410>

## **6. Candidate Site Register Consultation and Engagement (Regulation 15)**

- 6.1. The Development Plans Manual notes that at the Preferred Strategy stage (LDP Regulation 15) the LPA must publish the Candidate Site Register (CSR) and invite comments on it as part of the statutory consultation (see LDP Regulation 2, definition of pre-deposit proposal documents). Accordingly, alongside the consultation on the Preferred Strategy, consultation also took place on the Candidate Site Register (December 2022).
- 6.2. As with the Preferred Strategy (2022), details of the consultation methods are set out in the Initial Consultation Report and are therefore not repeated here.
- 6.3. In response to the consultation exercise, 650 representations were received in relation to the Candidate Site Register. In the main, respondents were objecting to the candidate site submissions, with full details of the comments set out in Section 4: Candidate Sites Register Summary of Representations, of the Initial Consultation Report.
- 6.4. As noted above in relation to the Candidate Site Register and 2022 Preferred Strategy, a Phosphate Briefing Update was sent out the week commencing 24<sup>th</sup> July 2023 to inform Members and all stakeholders on the RLDP consultation database of an updated approach to the water quality issue in the Rivers Wye and Usk and the implications for the RLDP and planning applications. The email advised that the Candidate Sites Register had been updated to reflect the changes, with sites previously filtered out in Monmouth due to the constraint, now included for consideration to inform the allocations of the Deposit Plan, and the addition of CS0293 – Land East of Abergavenny (2), which was submitted at the 2022 Preferred Strategy consultation stage. Stakeholders were advised that there would be an opportunity to comment on the updated Candidate Site Register at the Deposit Plan stage.

## 7. Deposit Consultation and Engagement (LDP Regulation 17)

7.1. Regulation 17 of the LDP Regulations (2005) requires that, prior to submitting its LDP to Welsh Government, the Council must publish its deposit draft for public consultation. The Deposit Plan was endorsed by Council at its meeting of 24<sup>th</sup> October 2024, for statutory consultation/engagement with communities and key stakeholders over a six-week period from 4<sup>th</sup> November – 16<sup>th</sup> December 2024. The Deposit Plan builds on the stages and evidence undertaken up to this point and contains the strategy, policies, and allocations, supported by relevant background evidence. It provides:

- Site allocations to meet identified needs.
- Defined areas of protection.
- Detailed policy framework including development management policies.
- Delivery and monitoring mechanisms.

### Consultation Documents

7.2. The consultation documents that were available during the Deposit consultation are set out below. Paper copies of the Deposit Plan, Deposit Summary, Deposit Integrated Sustainability Appraisal Report and Deposit Habitats Regulations Assessment were available for public inspection at County Hall Usk, the Council's Community Hubs and public libraries. All documents listed below were available to view on the Planning Policy website and available to view at the 'drop-in' sessions.

| Deposit Consultation Documents |  |
|--------------------------------|--|
| Key Stage                      |  |
| Deposit Plan                   | Replacement Local Development Plan Deposit Plan (October 2024)   |
|                                | Deposit Plan Summary (October 2024)  |
|                                | Animation (October 2024)   |
|                                | Initial Integrated Sustainability Appraisal (ISA) Report for the Monmouthshire Deposit Plan (September 2024); ISA Technical Annex – Candidate Site Assessment (September 2024); ISA Non-Technical Summary (September 2024) |
|                                | Habitats Regulations Assessment (HRA) of the Replacement Local Development Plan Deposit Plan (September 2024)  |
|                                | Initial Consultation Report (October 2024)   |
|                                | Self-Assessment of the Deposit Plan against the Test of Soundness (October 2024)   |
| Delivery Agreement             | Delivery Agreement (Updated October 2024)  |



|                      |   |
|----------------------|---|
| RLDP Previous Stages | RLDP Issues, Vision and Objectives (Updated September 2024)   |
|                      | RLDP Growth and Spatial Options (September 2022)  |
|                      | Preferred Strategy (December 2022)  |
|                      | Preferred Strategy Post Consultation Update to Council (October 2023)   |
| Candidate Sites      | Candidate Site Register (Updated July 2023)   |
|                      | Candidate Site Assessment Methodology (Updated July 2023)   |
|                      | Candidate Site High-level Assessment (As amended 2023)  |
|                      | Candidate Site Assessment Report (October 2024)   |
| Other Evidence       |   |
| Housing              | Monmouthshire Local Housing Market Assessment Refresh 2022-2037   |
|                      | Housing Background Paper (October 2024)   |
|                      | Demographic Evidence Report, Edge Analytics (Updated November 2021)   |
|                      | Preliminary High Level Viability Assessment (Burrows-Hutchinson, 2024)  |
|                      | Gypsy and Traveller Accommodation Assessment (2021 - 2026)  |
|                      | Gypsy and Traveller Background Paper (October 2024)   |
|                      | Sustainable Settlement Appraisal (Updated December 2022)  |
| Natural Environment  | Landscape Sensitivity Study Update, White Consultants (October 2020)  |
|                      | Areas of Amenity Importance Review (October 2024)   |
|                      | Green Wedge Assessments (LUC 2024)  |
|                      | Green Wedge Method Statement (LUC 2024)   |
|                      | Open Space Study (October 2024)   |
|                      | Emerging Green Infrastructure Strategy 2024 Executive Summary; Emerging GI Strategy 2024 Volume 1 and Volume 2. |
| Economy              | 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, BE Group (March 2020)  |
|                  | Employment Land Review, BE Group (November 2022)  |
|                  | Employment Land Background Paper (May 2022)   |
|                  | Monmouthshire Economy and Employment and Skills Strategy 2023   |
|                  | Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (May 2024)  |
| Renewable Energy | Renewable and Low Carbon Energy Assessment, The Carbon Trust (October 2020) and Non-Technical Summary   |
|                  | Renewable Energy Background Paper (October 2024)  |
| Retail           | Retail Background Paper (January 2024)  |
|                  | Monmouthshire Retail Study (2024)   |
| Minerals         | Minerals Regional Technical Statement (September 2020) and Welsh Government RTS Clarification Letter – 11 <sup>th</sup> November 2021                             |
|                  | Minerals Background Paper (October 2024)  |
| Waste            | The South-East Wales Waste Planning Report (April 2016)   |
| Infrastructure   | Infrastructure Delivery Plan Background Paper (October 2024)  |
| Transport        | Monmouthshire Local Transport Strategy 2024-2029  |
|                  | Strategic Transport Assessment Appendix A Technical Note (June 2024); Strategic Transport Assessment Non-Technical Report (June 2024).                            |
| Green Belt       | Letter to Julie James AM from Leader of MCC and Leaders of Monmouthshire County Council Labour group (September 2019)   |
|                  | Julie James AM reply to September 2019 Monmouthshire County Council letter (October 2019)   |
| Flood Risk       | Strategic Flood Consequence Assessment Stage 1 Report (November 2022); Strategic Flood Consequence Assessment Stage 1 Appendix F1 – Monmouthshire (November 2022) |
|                  | Strategic Flood Consequences Assessment Candidate Sites Screening   |

### Consultation and Engagement Methods

- 7.3. In accordance with the CIS, a number of engagement methods were utilised for the Deposit Plan consultation to encourage a broad response from different stakeholders and to seek a range of views on the proposals. The engagement methods undertaken are set out below.

| Consultation Methods  |
|---|
| <b>Member Involvement</b>   |
| <p><b>Member Workshops:</b> Three Member Workshops, hosted by Place Scrutiny Committee, were undertaken prior to the Deposit going before Full Council for approval to undertake public consultation on the Plan. The workshops were held virtually, each covering a broad topic area of the Plan:</p> <ul style="list-style-type: none"> <li>• 17<sup>th</sup> September 2024 – Workshop focus: Proposed RLDP timetable, Housing Allocations and Housing Policies.</li> <li>• 26<sup>th</sup> September 2024 – Workshop focus: Employment Allocations, Renewable Energy and Tourism Policies</li> <li>• 2<sup>nd</sup> October 2024 – Workshop Focus: Areas for Protection, Climate Change, Green Infrastructure and Public Consultation and Engagement</li> </ul> <p><b>Place Scrutiny:</b> A report was taken to Place Scrutiny on 10th October 2024 to facilitate pre-decision scrutiny on the Deposit Plan.</p> <p><b>Full Council:</b> Full Council meeting of 24<sup>th</sup> October 2024 endorsed the commencement of statutory consultation/engagement on the Deposit Plan with communities and key stakeholders for a six-week period between 4<sup>th</sup> November – 16<sup>th</sup> December 2024.</p> |
| <b>Press Release</b>  |
| <p>Prior to the start of the consultation period, a press release was prepared for local media.</p>   |
| <b>Notification via Email and Letter</b>  |
| <p>1<sup>st</sup> November 2024: Bilingual notification of the consultation, inviting comments, was sent to the statutory and approximately 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>  |
| <b>Public Information Exhibitions – ‘Drop-in’ Sessions</b>  |
| <p>Nine 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 including via posters, social media and the Planning Policy website.</p> <ul style="list-style-type: none"> <li>• 12<sup>th</sup> November 2024 – Raglan, Old Church School Community Centre, Chepstow Road Raglan</li> <li>• 14<sup>th</sup> November 2024 – Abergavenny Market Hall, Cross Street, Abergavenny</li> <li>• 18<sup>th</sup> November 2024 – Usk Community Hub, Maryport Street, Usk</li> <li>• 21<sup>st</sup> November 2024 – Palmer Centre, High Street, Chepstow</li> <li>• 25<sup>th</sup> November 2024 – Shire Hall, Agincourt Square, Monmouth</li> <li>• 27<sup>th</sup> November 2024 – Magor Baptist Chapel, The Square, Magor</li> </ul>   |

- 29<sup>th</sup> November 2024 – Portskewett Recreational Hall, Manor Way, Portskewett
- 2<sup>nd</sup> December 2024 – Goytre Village Hall, Newton Road, Penperlleni
- 4<sup>th</sup> December 2024 – Caldicot Town Council Building, Sandy Lane, Caldicot

The exhibitions displayed information bilingually with large display boards, such as maps of the proposed strategic sites, together with paper copies of the Deposit Plan, Proposals Map and supporting evidence. Copies of the Deposit Summary and leaflets were available to take away. The exhibitions allowed the public and local residents to 'drop-in' within the advertised time to discuss the Deposit Plan and any of the supporting information with a Planning Officer. A number of Officers were available at each of the nine exhibitions to explain the process and answer /clarify any queries. Photos of a selection of the 'drop-in' events are contained in Appendix 2. All events were well attended.

### Virtual Consultation Sessions

Virtual consultation events were held as an alternative to the 'drop-in' sessions or allow another opportunity to engage with Officers. Three events were held, one with representatives of the Town and Community Councils and two open to all to attend.

- **5<sup>th</sup> November 2024 – Town and Community Councils** specific event. Information was presented on the RLDP process, setting out the key policy objectives of the Plan and details of how to respond to the consultation. Town and Community Councils were also invited to disseminate information on the Deposit Plan to their communities and to help raise awareness of the consultation.
- **13<sup>th</sup> November 2024, 2pm – 3.30pm, and 9<sup>th</sup> December 2024, 6pm – 7.30pm, – virtual consultation events open to all to attend.** An introductory presentation of the RLDP process and an overview of the Deposit Plan, and an animation explaining the Deposit Plan process was played. The events were facilitated by MCC's Communication Team, with questions put to the Head of Placemaking and Planning Policy Officers.

### Engagement with Representatives of School Councils

In order to provide an opportunity to engage with young people an email was sent to Monmouthshire's comprehensive schools seeking to arrange for MCC's planning officers to meet with school council representatives from each school year, to present the Plan's key proposals and seek feedback to inform the consultation process.

Two schools responded to the invite, with an event undertaken in both:

- Caldicot Comprehensive School- 11<sup>th</sup> December 2024
- Chepstow Comprehensive School- 11<sup>th</sup> December 2024

A short presentation was given in both sessions, focussing on the specific local area. A discussion was held, focussed on a few key questions, with feedback forms provided to gain feedback on key issues/challenges in their areas and how they think the RLDP can help Monmouthshire to address its challenges. Large paper maps were also provided

with the pupils given the opportunity to illustrate how they would masterplan the relevant sites in their area.

The key issues raised during the school engagement is set out in Appendix 3.

### Business Engagement Events

To gain feedback and engage specifically on the economic element of the Plan, a business engagement event was organised in partnership with Monmouthshire's Economy, Employment and Skills Team. Feedback from the event that took place on the 6<sup>th</sup> December 2024, can be found in Appendix 4.

In addition, the Head of Placemaking attended the Business Resilience Forum meeting of 13<sup>th</sup> November 2024 to give a presentation on the RLDP and inform them of the consultation process.

### Climate Change Champions Meeting

28<sup>th</sup> November 2024 – Head of Placemaking gave a presentation to the Council's Climate Change Champions meeting to provide an overview of the RLDP's policies and proposals and to raise awareness of the public consultation.

### Social Media

Information regarding the Deposit Plan was posted on X and Facebook social media platforms, including MCC's corporate accounts. Multiple posts were put out throughout the consultation period including posting the animation to advertise the consultation period and the specific 'drop-in' and virtual engagement events.

### Consultation Material

As part of the consultation and engagement on the Deposit Plan, a range of formats and methods were used to provide information on the content of the Plan and also how to provide contribute to the process. These included bilingual versions of the following:

- Summary document: this provides an overview of the key elements of the Plan.
- Posters: advertising the 'drop-in' events with a QR code available to scan for further details. A copy can be viewed in Appendix 5.
- Leaflets: these were prepared for each of the nine 'drop-in' sessions and contained a map showing the allocations proposed in the area, key information about the consultation and a QR code providing more details on how to respond to the Plan. An example of a leaflet is contained in Appendix 6.
- An A-board advertising the drop-in sessions was placed in a visible spot outside each 'drop-in' venue to raise awareness that the event was taking place that day. Appendix 7 provides an example.
- Representation Response Form: two versions of the response form were available, a paper version which was available from the Community Hubs or the 'drop-in' sessions or downloadable off the website to fill in electronically and email in. The

second method was an online version, which was available via the Council's website to fill in and submit electronically.

- **Notice of Deposit Matters:** this was sent out to all stakeholders on the RLDP consultation database and available to view at the 'drop-in' sessions and at County Hall and the Community Hubs. A copy is contained at Appendix 8.

### County Hall and Community Hubs

The consultation documents were also available to view at County Hall, Usk and MCC Community Hubs (Abergavenny, Caldicot, Chepstow, Gilwern, Monmouth and Usk) during normal opening hours.

### Site Allocation Notices and Adjacent Properties Letters

In order to be transparent as possible with regard to the RLDP's proposed site allocations the following bilingual methods of correspondence were undertaken:

- **Site Allocation Notices:** a number (dependent on the size of the allocation) of sites notices were placed in close proximity to the land associated with each proposed RLDP allocation. These contained a map identifying the boundary of the proposed allocation and details of how to view the Deposit Plan and supporting information, along with a QR code directing readers to the Council's Planning Policy website for further information. An example of a site notice is provided in Appendix 9.
- **Adjacent Properties Letters:** a letter was sent to all properties within a 100m buffer zone of each of the proposed RLDP allocations. These also included a copy of the site noticed referenced above and a leaflet identifying the site and proposed use and how to find out more about the policies and proposals contained within the Deposit Plan. A sample letter is contained in Appendix 10.

- 7.4. The various methods of consultation and engagement proved highly effective, with 956 duly made responses received on the Deposit Plan, from a mixture of statutory consultees, organisations, agents, community groups and private individuals responding to the consultation. These responses resulted in over 4,000 individual representations being made on different elements of the Plan. A breakdown by Policy is set out in Appendix 11 and a summary overview of the key topic areas is set out below.

| RLDP Policy/Section                     | Approximate No. of Representation by Type |            |         |       |
|---|---|------------|---------|-------|
|   | Comments                                  | Objections | Support | Total |
| Key Issues, Vision and Objectives       | 33  | 100        | 56      | 189   |
| Growth and Spatial Strategy (S1 and S2) | 13  | 336        | 47      | 396   |
| Managing Settlement Form (OC1, GW1)     | 3   | 37         | 25      | 65    |

|  |    |      |    |      |
|--|----|------|----|------|
| Placemaking and High-Quality Design (S3, PM1 – PM3, HE1 – HE3)                               | 10 | 56   | 27 | 93   |
| Climate Change (S4, NZ1, CC1 – CC3)  | 22 | 153  | 46 | 221  |
| Green Infrastructure, Landscape & Nature Recover (S5, GI1- GI2, LC1 – LC5, NR1 – NR3, PROW2) | 24 | 96   | 58 | 178  |
| Infrastructure (S6, IN1)   | 13 | 142  | 16 | 171  |
| New Housing (H1 – H8)  | 13 | 38   | 9  | 60   |
| Affordable Housing (S7, H9)  | 14 | 87   | 28 | 129  |
| Residential Allocations (S8, HA1 – HA18)   | 79 | 1003 | 52 | 1134 |
| Gypsy & Travellers (S9, GT1)   | 4  | 60   | 7  | 71   |
| Employment & Economy (S10, EA1 – EA2, E1 – E2)   | 30 | 102  | 28 | 160  |
| Rural Enterprise (S11, RE1 – RE6)  | 2  | 7    | 0  | 9    |
| Visitor Economy (S12, T1 – T2)   | 3  | 39   | 21 | 63   |
| Sustainable Transport (S13, ST1 – ST6)   | 17 | 80   | 32 | 129  |
| Retail & Commercial Centres (S14, RC1 – RC4)   | 4  | 34   | 18 | 56   |
| Community Infrastructure (S15, CI1 – CI4)  | 7  | 49   | 28 | 84   |
| Minerals (S16, M1 – M3)  | 5  | 13   | 11 | 29   |
| Waste (S17, W1 – W3)   | 4  | 19   | 14 | 37   |

- 7.5. Four petitions were submitted in response to the Deposit consultation, with the representations included within the figures noted above and in Appendix 11. Brief details are summarised below.

| Organisation/<br>Representor     | No. of Signatories  | Brief Details  |
|----------------------------------|---|--|
| Save Our Unique Landscape (SOUL) | Submitted on behalf of 250 members who live in Abergavenny (although no details of these were provided) | <ul style="list-style-type: none"> <li>• In principle support for the housing provision figure of 6,210 homes.</li> <li>• Consider the jobs figure to be very ambitious.</li> <li>• Conditional support for the allocation of HA1 – Land to the East of Abergavenny, subject to viability and connectivity.</li> <li>• Object to HA5 – Land at Penlanlas, due to impact on the BBNP setting.</li> <li>• Object to the limited amount of employment land allocated in Abergavenny.</li> </ul> |
| Neil Niblett                     | 14 signatories  | <ul style="list-style-type: none"> <li>• Object to employment allocation EA1a – Land at Nantgavenny Business Park, Abergavenny.</li> <li>• Objections primarily relate to the highway impact of the proposal on Nantgavenny Lane and the Nantgavenny Lane/Hereford Road junction.</li> <li>• Other concerns related to the impact on residential amenity, ecological impact and loss of greenfield land.</li> </ul>  |
| Richard Liddell                  | 56 signatories  | <ul style="list-style-type: none"> <li>• Object to settlement boundary changes made to accommodate the proposed mixed-use allocation HA3 – Land at Mounton Road, Chepstow.</li> <li>• Object to proposed site allocation HA3 – Land at Mounton Road, Chepstow.</li> <li>• Concerns raised included the visual impact of the site, loss of an important green wedge, impact on the highway network and impact on the historic environment.</li> </ul>   |
| Residents of Mardy               | 40 signatories  | <ul style="list-style-type: none"> <li>• Object to housing allocation HA5 – Land at Penlanlas, Abergavenny.</li> <li>• Concerns raised included impact on the setting of the BBNP, highway impact, loss of a greenfield site and ecological impact.</li> </ul>   |

- 7.6. All individual representations have been published within a Register of Representations as a factual record of the representations received on the Deposit Plan.



## 8. Summary of Deposit Consultation Representations (LDP Regulation 17)

8.1. This section provides an overview of the main issues arising from the public consultation and engagement undertaken on the Deposit Plan. On a high-level basis, the following key themes emerged from the consultation:

- **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.
- **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 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 the local community 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.
- 8.2. 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 the table below. Individual responses to all representations received are provided in the Deposit RLDP Representation Responses, issued by volume, due to the number of representations received. Details of each volume and the policy area covered are set out in Appendix 12.
- 8.3. 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 and are shown as track changes in the amended version of the Deposit RLDP and Proposals Map.

## Deposit RLDP Consultation Responses – Main Themes/Issues Raised

|  |    |
|--|----|
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| Gypsy & Travellers.....                                      | 47 |
| Employment and Economy .....                                 | 48 |
| Rural Economy .....  | 49 |
| Visitor Economy .....  | 50 |
| Sustainable Transport .....                                  | 50 |
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|  |     |
|--|-----|
| HA12 – Land West of Trem Yr Ysgol, Penperlleni .....             | 89  |
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| EA1e/W3f – Land adjoining Oak Grove Farm, Caldicot.....          | 105 |
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| EA1g – Rockfield Farm, Undy .....                                | 107 |
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| EA1j/W3b – Land West of Raglan .....                             | 108 |
| EA1k – Land to the East of Abergavenny.....                      | 110 |
| EA1l – Land at Former MOD Site, Caerwent .....                   | 110 |
| EA1m – Land to the East of Caldicot/North of Portskewett .....   | 110 |
| W3g – Existing Waste Facility – Five Lanes, Caerwent .....       | 111 |
| W3h – Existing Llanfoist Civic and Transfer Station .....        | 111 |

| RLDP Policy Area                     | Main Themes/Issues Raised  |
|--------------------------------------|--|
| <b>Issues, Vision and Objectives</b> | <p>The Issues along with the challenges and opportunities were supported in the main. Where objections were made these generally related to site allocations or other policies within the Plan, suggesting these would perpetuate the issues.</p> <p><b>The key issues, challenges and opportunities have been identified through the RLDP preparation process with a summary of the key economic, environmental, social and cultural issues included within paragraph 3.1.1 of the Plan. Further detail is set out in the RLDP Issues, Vision and Objectives Paper and Appendix 6 of the Deposit RLDP.</b></p> <p>The Vision was also generally supported. Some site promoters requested the vision be amended to recognise the role market housing plays in addressing affordability issues, stating this was of importance, as an alternative to placing emphasis on affordable housing.</p> <p>It was also requested by a number of representors that the term exemplar be defined.</p> <p><b>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. The growth strategy communicates the scale of future development. It is recognised that the delivery of market housing is often required to bring forward much needed affordable homes, however the emphasis is appropriately placed on meeting affordable housing need to address this key local issue.</b></p> <p><b>Welsh Government support this approach in their representation on the Deposit RLDP, noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</b></p> <p><b>Regarding the term exemplar, it is recommended that this be included within the glossary of the RLDP to provide clarity. The following definition is suggested; exemplar development relates to development of a high standard. It relates to more than just good design it considers social, economic, environmental and cultural aspects as well as physical appearance.</b></p> <p>Many comments on the objectives related to minor amendments to the wording. Some reflected comments made to the issues and vision such as defining exemplar and highlighting the important role market housing plays in addressing affordability issues.</p> <p><b>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues, including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</b></p> |

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|   | <p><b>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County.</b></p> <p><b>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</b></p>  |
| <p><b>RLDP Sustainable and Resilient Communities Strategy</b></p> | <p>The response received to the RLDP's growth strategy was primarily objected to 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 is not in conformity with Future Wales. The second view is that the growth level is too low and fails to sufficiently address the RLDP's core issues and objectives and the 2021 Preferred Strategy growth level is more appropriate. There was, however, recognition of the balance the Council has had to factor into the proposed growth level, including Welsh Government's previous concerns regarding conformity with Future Wales and impact on the growth of the South-East Wales National Growth Areas.</p> <p>Similarly, the proposed flexibility allowance of 15% was objected to as being too low, with 20% regularly suggested, and also objected to on the basis that it is too high. Concerns were also raised in terms of the proportion of the housing supply that is met via completions and other allowances, such as existing commitments, windfalls and infills.</p> <p>Views were also expressed that the proposed growth is contrary to the Council's climate and nature emergency.</p> <p><b>The RLDP's growth strategy seeks to strike 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 responds 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. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, 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 Draft Plan 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."</b></p> <p><b>In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Deposit Plan is, therefore, considered to represent a sustainable level of growth that addresses our key 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 previous concerns regarding alignment with Future Wales.</b></p> |

In recognition of the balance to be struck in the RLDP, Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also providing additional homes and enabling economic growth.

With regards to the flexibility allowance, the Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure, whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also 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 and enables the provision of a range and choice of sites, ensuring 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 also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.

The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date, existing commitments that are considered to be deliverable in the Plan period and windfall and infill allowances. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). This has resulted in consequential changes to the indicative distribution of residential growth set out in Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy.

With regards to the Spatial Strategy set out in Strategic Policy S2, there was some support for the proposed hierarchy. However, comments relating to a disproportionate amount of growth to most settlements were received, but primarily in relation to the south of the County. Concerns were also raised at the over reliance on two large 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 could have on the delivery of the growth strategy.

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 86% of the level of housing growth proposed in these settlements. 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 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred

|                                 |   |
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|                                 | <p>Strategy, whereby they acknowledged 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”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. 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>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/North of Portskewett) 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. Furthermore, the Plan incorporates a 15% flexibility allowance to allow for a more robust and resilient approach to site delivery. The flexibility allowance also enables the Plan to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites. Furthermore, the RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</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. Further details on the anticipated delivery rates specific to HA1 - Land to the East of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, are set out in response to the site-specific representations.</p> <p>The potential conflict between the list of developments that would be considered as exceptions in the open countryside and those covered by other policies in the RLDP was also highlighted.</p> <p>Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy 2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list.</p> |
| <b>Managing Settlement Form</b> | <p>The principles of both OC1 New Built Development in the Open Countryside and GW1 Green Wedge Designations generally received support, with the majority of responses welcoming the requirement to manage and control development in open countryside locations in Monmouthshire.</p> <p>In terms of OC1, clarification was required in terms of what development is allowed in the open countryside.</p> <p><b>The response to this has been to simplify the policy by deleting the references to other policies in RLDP within criterion a). The type of development proposals allowed in open countryside locations is set out in national planning policy.</b></p>  |



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|                               | <p>With reference to GW1 there have been several comments in relation to clarification for justifications for designations of the Green Wedges set out in the RLDP Proposals Map.</p> <p><b>These justifications are set out within the Green Wedge Review (2025) which sets out the final conclusion and justifications for the Green Wedge Designations for Policy GW1, based on the methodology and green wedge parcel assessments undertaken by Land Use Consultants (LUC) on behalf of MCC. The Green Wedge Review (2025) concluded that few individual parcels of existing green wedge land did not warrant re-designation. In terms of new designations, these were allocated between the settlement edge of Abergavenny and the statutory designation BBNP, whereby the review took into consideration paragraph 3.68 of PPW, which sets out that green wedges ‘may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area.’ The Green Wedge Review (2025) has concluded that those parcels of land in the area between the settlement of Abergavenny and BBNP that have a high or high-moderate green wedge potential are designated as green wedges. There has been a slight boundary adjustment to parcel AG10 to accommodate the RLDP residential allocation Land at Penlanlas Farm. Please see the Green Wedge Review (2025) for further information.</b></p> |
| <b>Placemaking and Design</b> | <p>Strategic Policy S3 relating to Sustainable Placemaking and High-Quality Design was generally well received and supported. Where objections were made, these generally related to specific sites rather than the actual policy wording.</p> <p><b>Strategic Policy S3 and detailed policies set out within the RLDP provide a positive planning framework for sustainable placemaking and high quality design across the County.</b></p> <p>The detailed placemaking policies (PM1, PM2 and PM3) were generally supported. As with Policy S3, objections made had no direct relevance to the content of the policies and related to other policies such as the site allocations.</p> <p><b>Additional detail relating to policy PM1 will be provided within Supplementary Planning Guidance (SPG) associated with Strategic Policy S11 and Policy PM1. Appendix 11 identifies a Placemaking and Design SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</b></p> <p>There were limited comments on the detailed heritage policies (HE1, HE2 and HE3) and many of those received did not have direct relevance to the content of the policies.</p> <p><b>The relevant comments were signposted to supplementary planning guidance relating to Conservation Area Appraisals.</b></p>  |
| <b>Climate Change</b>         | <p>The overarching principles of the RLDP’s policy approach to climate change were generally well received and supported. However, many consider the RLDP allocations to be contrary to the aims of the climate change policy objectives, particularly in relation to flood risk and surface water run-off, air quality and developing on greenfield land. A number of site promoters/agents expressed the view that climate change policy requirements should be applied more flexibly, on a site-by-site basis and having regard to viability issues.</p>   |

**Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.**

**The incorporation of climate change considerations into development proposals is a key policy objective of the Council. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met, however, the application of the climate change policy requirements to all development is considered to be appropriate. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.**

The overarching ambitions of Policy NZ1 Net Zero Carbon Homes were generally supported. Some respondents, however, raised concerns regarding its compliance with national planning policy and policy implementation, including the practicalities of implementation, feasibility and viability, as well as the lack of resources to implement the policy. Others considered that these policy standards should also apply to non-residential development.

**Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1. This policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.**

**With regard to policy implementation, MCC has undertaken considerable consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys'. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.**

**In terms of non-residential development, due to the wide range of typologies and scales of development requiring assessment to build an evidence base for widening the policy to non-residential development, it was not considered practical or feasible to progress this for the current RLDP.**

There was general support for a specific sustainable drainage systems policy (CC1), with surface water run-off being a key issue raised as part of the consultation process. However, others felt that it is not needed as it repeats requirements set out in separate legislation.

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|  | <p><b>The RLDP recognises that sustainable drainage (SuDS) systems are a requirement of separate legislation, however, Policy CC1 is considered necessary to reinforce the Council’s position that regardless of size, there will be an expectation that sustainable drainage methods are incorporated into a scheme. The policy will, therefore, be of relevance to schemes lower than the threshold set out in the relevant legislation. The policy also highlights that the distribution of SuDS features across the site should be prioritised.</b></p> <p>Welsh Government noted support to the approach taken to consider renewable energy generation proposals on a site-by-site basis against the policy criteria set out in Policy CC3 of the RLDP, rather than through the identification of Local Search Areas. General support was received to the criteria-based policy; however, some consider the criteria to be too restrictive.</p> <p><b>A robust evidence base has informed the RLDP’s approach to the appropriate way to consider renewable energy proposals on a site-by-site basis; Welsh Government’s support on this issue is therefore welcomed. Policy CC3 seeks to ensure such proposals are balanced against a range of issues including wider environmental, economic, social and community benefits and reflects national planning policy.</b></p> <p>Objections were raised to the renewable energy allocation made at Raglan Enterprise Park under policy CC2. These primarily relate to the loss of agricultural land and loss of the farming business currently operating on the land. Concerns relating to surface water run-off and biodiversity impacts associated with the allocation were also raised.</p> <p><b>Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives. The RLDP includes a robust policy framework to consider the concerns raised, including surface water run-off and biodiversity impacts. Due to the prevalence of high-quality agricultural land in the County it is extremely challenging to avoid locating ground mounted solar proposals on agricultural land. While the land allocated under Policy CC2 is Grade 3a Best and Most Versatile Land within the agricultural land classifications, the site performs best in this respect when compared to the other solar related candidate site submissions.</b></p> |
| <b>Green Infrastructure, Landscape &amp; Nature Recovery</b> | <p>The overarching principles of the RLDP’s policy approach to Green Infrastructure, Landscape and Nature Recovery were generally well received and supported. However, as with the climate change policies, many consider the RLDP allocations to be contrary to the aims of the policy objectives of preserving and enhancing Monmouthshire’s natural resources and ecosystems, particularly in relation to developing on greenfield land and that the policy wording is not strong enough to protect our natural resources, as the policies do allow development to take place.</p> <p><b>The Plan’s key issues and objectives address all elements of sustainable development including the provision of homes and economic growth in order to address the county’s key issues of ageing demographic and much needed affordable housing provision. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, which includes new growth, and should be read as a whole. The GI, Landscape and Nature Recovery protection policies accord with national planning policy, legislation and case law. Chapter 6 of PPW has recently been strengthened with the ‘Net Benefit for Biodiversity’ approach which places a</b></p>   |

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|                       | <p><b>duty on the Council to seek to maintain and enhance biodiversity by ensuring development does not cause significant loss of habitat or populations of species and must provide improved ecosystem resilience. Overall, the policies are considered appropriate and robust to safeguard Monmouthshire's special environment and biodiversity and reflect up to date evidence and legislation.</b></p> <p>There was general support for Policy Green Infrastructure (GI1), however, various comments were received in relation to the policy repeating National Policy and that the reference to developers/applicants to provide GI Assessments conflicted with national planning policy which requires LPAs to undertake these assessments.</p> <p><b>The Policy is not considered to repeat National Policy. It has been written to be locally specific to Monmouthshire and reference is made for proposed development proposals to be informed by MCC's GI Strategy and GI SPG. With regard to GI assessments, for clarification it is proposed to change wording within the Policy and supporting text from 'GI Assessment' to 'GI Statement'. With GI Assessment a reference used for work being undertaken by the Council, such as MCC's GI Strategy ; and GI Statements the terms used when developers/ applicants are required to submit green infrastructure information as part of planning applications . The terms GI Assessments and GI Statements will also be included and defined in Appendix 12 of the RLDP Glossary of terms.</b></p>   |
| <b>Infrastructure</b> | <p>Most objections received by members of the public related to concerns in relation to existing infrastructure within areas, with some suggesting that development should be directed elsewhere. A number also questioned the funding and delivery of infrastructure projects noting development shouldn't proceed until the supporting infrastructure is in situ.</p> <p><b>Regarding the location of development, in accordance with Planning Policy Wales (PPW) (2024) housing land should be sited in sustainable locations. The housing and mixed-use allocations identified in the RLDP and any proposals for new housing development outside of the allocations are located in accordance with the Settlement Hierarchy set out in Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the County's primary settlements and most sustainable lower tier settlements.</b></p> <p><b>Adequate and efficient infrastructure is recognised in PPW as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering sustainable development and meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan.</b></p> <p><b>In addition to Strategic Policy S6, an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP is included within Appendix 8 of the RLDP.</b></p> <p><b>With regard to allocated sites, site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the IDP included within Appendix 8 of the RLDP. Site promoters of the allocated residential and mixed-use sites have also completed site specific financial viability assessments (FVA) to support their proposals to demonstrate that their sites are viable based on key policy requirements set out within the site allocation policies, including the provision of 50% affordable homes and net zero carbon homes,</b></p> |

**without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.**

Organisations including Dŵr Cymru Welsh Water, Network Rail along with some of the housebuilders provided general support for Policy S6. A number of site promoters, nevertheless, questioned the need for a separate policy relating to infrastructure stating this is something that would be assessed on a site-by-site basis and that for allocated sites the information is most relevant in the associated policy.

**Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development and provides the overarching framework for all types of development. It is recognised that the allocated site policies and IDP (Appendix 8) set out likely infrastructure requirements for the allocated sites. However, without an overarching policy on infrastructure there would be no reference point for other non-allocated development proposals. It is, therefore, considered necessary to retain Policy S6 within the RLDP.**

A few representors didn't think the IDP went far enough suggesting any requirements will be left to determine at the planning application stage.

**The IDP sets out the infrastructure requirements, costs etc at this stage of the planning process. Further details will be determined as the site progresses to the planning application stage, as necessary. The estimated costs within the IDP will be updated further where relevant in the RLDP process, when additional information relating to key elements of infrastructure is known. The IDP Background Paper provides more detail on existing infrastructure provision and capacity covering a range of topic areas.**

**Welsh Government support this approach in their representation on the Deposit RLDP noting the inclusion of the Infrastructure Delivery Plan Background Paper is in line with paragraphs 5.125 – 5.128 of the Development Plans Manual Wales (2020).**

With regard to the HA2 Caldicot East North of Portskewett site and the wider Severnside area, questions were raised about health infrastructure. The Aneurin Bevan Health Board also noted local concerns about the Gray Hill Surgery in Caldicot which serves the whole of the Severnside area and has an additional practice in Magor.

**The IDP has been informed by, and prepared in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. While health infrastructure isn't listed specifically in the IDP in relation to the site allocation at Caldicot East North of Portskewett, on-going discussions are taking place with the Aneurin Bevan University Health Board (ABUHB) which have progressed further since the Deposit Plan consultation. While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in service improvement across the County as a whole. It is recognised that there is additional need for GP services in the South of the County in particular, and the Council is, therefore, working with ABUHB in finding a solution and delivering a service on the HA2 Caldicot East North of Portskewett site.**

High Beech Roundabout and traffic congestion around the Chepstow area was considered by many to be a fundamental issue for the area.

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|                           | <p>The operational capacity of the Highbeech roundabout, which is a trunk road roundabout is under the jurisdiction of Welsh Government (WG) Highways, is a key consideration of the site allocation at Land at Mounton Road (Policy HA3). Welsh Government Highway Officers have been consulted on the proposed allocation and have not objected to the inclusion of Mounton Road as a site allocation, subject to any development coming forward being in line with principles of the Wales Transport Strategy (WTS) the Active Travel Guidance Act and other relevant guidance. Welsh Government have committed to delivering WelTAG 1 and 2 studies in collaboration with key partners, including Monmouthshire County Council and Transport for Wales, to identify and assess various options to improve transport movements at this key intersection and Chepstow as a whole. MCC will continue to work with WG and other partner organisations on this matter.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations with also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>  |
| <p><b>New Housing</b></p> | <p>Comments received in relation to the policies that allow residential development within the defined settlement boundaries, with these largely focussed on objections to the settlement boundaries themselves.</p> <p>The settlement boundaries defined on the Proposals Map to inform the implementation of the new housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by 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, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with Raglan, Usk and Penperlleni identified as Tier 2, Secondary Settlements. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy.</p> <p>With regard to residential development in minor residential settlements, concern was expressed in relation to the policy wording allowing for minor small scale rounding off or the infilling of a small gap between existing buildings.</p> <p>The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes. Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its</p> |

landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.

The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 is considered to reflect the balance referred to in PPW. Infill development is not restricted to gaps between existing residential properties as there could be equally acceptable opportunities between other buildings. Policy H3 seeks to avoid encroachment into the open countryside, restricting development to physical form of the settlement, but recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.

### **Housing Mix**

Some of the site promoters raised concern over the approach to housing mix in the Deposit RLDP, suggesting this should apply to affordable housing only and not market homes.

**In accordance with Planning Policy Wales (2024) LPAs should plan for a mix of market and affordable housing types to meet the housing requirement and specifically consider the differing needs of their communities. Additionally, localised issues must also be considered and a local policy approach can be applied where justified to support the viability of communities.**

The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. Reflecting this, the housing mix policy (Policy H8) seeks to ensure that new housing developments of 10 or more homes provide an appropriate range and mix of house types, tenure and size to assist in addressing our issues and objectives relating to affordability and demographic challenges. Ensuring a mix of good quality homes of different types and sizes can help to meet the needs of the community and contribute to balanced communities. Low Cost Home Ownership (LCHO) can provide opportunities for first time buyers through the provision of starter homes. However, there is also a need to ensure the provision of additional smaller market units for those that do not meet the criteria for LCHO properties but cannot necessarily afford the typical larger homes on the market in Monmouthshire. The provision of small to medium homes of three bedrooms or fewer will increase the choice of homes for single households, smaller families, young couples/mixed young households as well as older households who would like to downsize, which will help retain these cohorts within Monmouthshire and sustain our communities.

Other site promoters suggested there should be flexibility in the circumstances in relation to the housing mix policy.

**Policy H8 is flexible in so far as it does not set limits through the use of percentages or numbers for different sized market homes. Policy H8 requires development proposals to be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included in the RLDP. It would, therefore, be in any site promoters benefit to submit such statements at the pre-application stage to aide discussions with the Council. The Council will give consideration to the preparation of a planning advice note/SPG to provide further clarification on the interpretation/implementation of Policy H8.**



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|                           | <p><b>Site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements. The FVA's also set out the mix of market housing and where this has not been appropriate, site promoters have been notified and have updated their FVA's accordingly. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</b></p>  |
| <b>Affordable Housing</b> | <p>Welsh Government provided support of the Plan's approach to affordable housing noting there is a severe need to deliver affordable housing, particularly for younger people, and the Council's approach will ensure Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development compatible with Future Wales.</p> <p>There was, however, a mixed response from other representors in relation the Plan's approach to affordable housing. While some provided support for the need for additional affordable housing and applauded the bold approach, others questioned the need for 50% affordable homes and suggested the percentage be dropped to match that of the Adopted LDP. Some raised concern about impact on local infrastructure and lack of jobs within areas.</p> <p><b>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</b></p> <p><b>In conformity with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, that was included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</b></p> <p>Many of the site promoters supported the policy approach but others raised concern about viability impact, noting that Monmouthshire is the first local authority in Wales to set out a requirement for 50% affordable housing, despite evidence set out in the Preliminary High Level Viability Assessment and individual site-specific Financial Viability Assessments.</p> <p><b>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</b></p> <p>Many members of the public had general questions relating to how affordable homes would be allocated, questioning the type of affordable homes and raising concern that they would not be allocated to local people.</p> |



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|                               | <p><b>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</b></p> <p><b>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homesearch website.</b></p> <p><b>The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes.</b></p> <p>Questions were raised in relation to the provision of homes for the ageing Monmouthshire population in relation to both market and affordable homes.</p> <p><b>Policy S7 intentionally relates solely to affordable housing. However, paragraph 12.10.4 of the RLDP refers to a range of household types, including older person households. It also refers to bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing. In accordance with Planning Policy Wales (2024), paragraph 12.9.1 sets out the type of specialist housing referred to in Policy H7, including age-restricted general market housing, generally aimed at those over 55, as well as sheltered housing and residential care/nursing homes.</b></p> <p>With regard to affordable housing exception sites, while some supported the flexibility in the policy approach to enabling exception sites in different settlement tiers, other site promoters suggested the site size thresholds were too low. A few objections were made in relation to the Tier 4 settlements where affordable housing exceptions could be made for sites of up to five homes, suggesting this level of housing development would not be acceptable in these locations.</p> <p><b>National planning policy encourages the use of affordable housing exceptions policies to help meet affordable housing need and support the viability of local communities. Reflecting this, the development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further information regarding this approach. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2.</b></p> |
| <b>Gypsy &amp; Travellers</b> | <p>Support was noted by Welsh Government to allocating a site within the RLDP to address the need identified in the Gypsy Traveller Accommodation Assessment. More generally, however, objections were raised in relation to the Gypsy and Traveller allocation at Bradbury Farm, Crick for 7 pitches. Concerns primarily focussed on the suitability of the site due to issues such as noise and highways impact, access to</p>   |

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|                               | <p>services, proximity to the settlement community and the disproportionate number of Gypsy and Traveller sites located in the south of the County. Operational issues such as management, allocation of pitches and rental/council tax payments were also raised as concerns.</p> <p><b>Planning Policy Wales (PPW) requires local authorities to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need (4.2.36). Site investigation surveys including air quality, transport, ecology, and noise surveys have been undertaken to inform the site identification process. The survey findings were considered at the Cabinet meeting of the 21<sup>st</sup> August 2024 which approved the inclusion of Land at Bradbury Farm, Crick as an allocation in the Deposit RLDP. Further survey work will be undertaken as necessary at the planning application stage. Further guidance is set out in Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Site. This notes at paragraph 38 that ‘in deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services.’ In this respect, the proposed allocation at Bradbury Farm and its proximity to residential areas is considered to be in accordance with national planning policy guidance and offers opportunities to masterplan the site as part of the wider proposals in the area.</b></p> <p><b>Welsh Government has a commitment to ensure a wide choice of accommodation is available and ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers, to have equal access to culturally appropriate accommodation as all other members of the community. With regard to existing Gypsy and Traveller sites in the County, each site is considered against the relevant policy framework and assessed on its own merits.</b></p> <p><b>Site management arrangements for the proposed allocation are still under consideration; however, pitch allocation arrangements will operate in a similar fashion to the housing register whereby families register their interest to be allocated a pitch or pitches.</b></p> |
| <b>Employment and Economy</b> | <p>The comments received on the Employment and Economy section of the RLDP referred to the job figure as being optimistic and uncertainty as to how it will be achieved. Clarification was also sought in relation to how the employment land figure was arrived at. Concern was raised at the lack of employment land allocated in Abergavenny and the disproportionate amount allocated in Raglan.</p> <p><b>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes credible 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 economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised the jobs figure is higher than some past trends, it is within the range of past performance in the County. In addition to industrial based jobs, many jobs will be delivered through foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire’s economy. This reflects the character of the wider economy of South-East Wales and should be supported in line with the ‘whole economy’ approach that is advocated by national planning policy.</b></p>   |

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|                      | <p>In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the County and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>National planning policy requires Local Development Plans to make provision for employment land. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given that allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The approach taken is, therefore, considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p> <p>On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the RLDP, with the majority of both directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area). The limited level of employment allocations made in Abergavenny is recognised, this is, however, a reflection of the limited number of candidate site submissions the Council received for the area for employment use. 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 other relevant partners. Furthermore, Policy EA2 of the Replacement Local Development Plan (RLDP) protects six existing industrial estates for employment use within Abergavenny, which also contribute to provision in the area. The Plan's policy framework also supports/enables proposals for economic growth in Abergavenny, including proposals in foundational sectors, such as tourism, food and retail, which play an important role in the local economy. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, which reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.</p> |
| <b>Rural Economy</b> | <p>A key theme to emerge with regard to the rural economy policies is the view that rural enterprise developments conflict with the principles of Policy S2 – Spatial Distribution of Development, as it allows appropriate development adjacent to a settlement boundary, which is defined as open countryside. Objections were also received in relation to the inclusion of a policy to assess poultry units and the environmental impact such developments.</p> <p><b>Policy S2 - Spatial Distribution of Development - Settlement Hierarchy</b>, notes that outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be where justified by national planning policy. Planning Policy Wales notes rural enterprise developments as a form of development potentially acceptable in the countryside. Policies RE1, which only allows appropriate small scale rural enterprises adjoining the settlement boundary, subject to detailed planning considerations and S2 are therefore considered to be consistent with each other.</p>  |

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|                              | <p><b>The inclusion of Policy RE5 – Intensive Livestock / Free Range Poultry Units, in the RLDP is consistent with Planning Policy Wales (PPW) and the Welsh Government Chief Planning Officer’s Letter of 12th June 2018, which advises Local Planning Authorities to put in place appropriate policies in Local Development Plans in order to facilitate the sustainable consideration of this type of development. The policy does not allocate/provide more poultry units, but provides the framework to consider such developments, consistent with national policy. It is however, proposed to add an additional criterion to the policy to address cumulative impacts, consistent with national planning policy.</b></p>   |
| <b>Visitor Economy</b>       | <p>The overarching visitor economy principles set out in Strategic Policy S12 were generally supported, where it was recognised that Sustainable Tourism principles help to support Monmouthshire’s economic prosperity. There was concern, however, that the policy does not provide enough detail or published evidence on how Monmouthshire’s visitor economy will be sustained and strengthened. There were also representations that raised concerns that proposed residential allocations in the Plan would discourage tourism away from Monmouthshire.</p> <p><b>It is acknowledged that the Plan’s approach to sustaining Monmouthshire's visitor economy is consistent with national planning policy (PPW and Future Wales) to plan positively and recognise the importance of tourism to economic prosperity and job creation within Monmouthshire, both in urban and rural locations, and balancing this against the need to protect Monmouthshire’s unique and special environment. The Plan, however, is not the only mechanism to promote the Council’s tourism strategy, with Monmouthshire’s Destination Management Plan 2017-2020 and Monmouthshire’s Economy, Employment and Skills Strategy (EESS) (2023) also providing the supportive means and further detailed strategies to promote and strengthen the tourism industry within Monmouthshire.</b></p> <p>In reference to Policy T1 ‘New or extended Tourism Accommodation and Facilities in the Open Countryside’, there was general support but concern the impact of development in open countryside/green field locations could negatively impact on the surrounding environment and biodiversity. Comments also questioned whether tourism allocations should have been included within the Plan.</p> <p><b>The criteria set out in Policy T1 have been developed to reflect the high level support that national planning policy provides in relation to supporting the rural economy. The policy criteria are considered to be appropriate and specific and ensures that development proposals comprehensively reflect and demonstrate the sustainability principles set out in national planning policy. The Policy requires that all development proposals are evidenced with a ‘Sustainable Tourism Need and Impact Assessment’ (STNIA). As noted in Appendix 11 of the RLDP, Sustainable Tourism Supplementary Planning Guidance will be prepared which will provide further detailed guidance on interpretation of the criteria set out in Policy T1.</b></p> <p><b>With regard to the approach not to allocate tourism sites within the Plan, it is considered more appropriate to develop a supportive planning policy framework for sustainable development proposals in the county, which allows for consideration of sustainable tourism beyond identified settlement boundaries.</b></p> |
| <b>Sustainable Transport</b> | <p>Sustainable Transport policies were in general supported where it was recognised that the premise to promote and prioritise public transport and active travel (walking, wheeling cycling) improvements and design was positive and proactive. There were various concerns raised, however, that with Monmouthshire being largely a rural county existing public transport services and facilities are poor and not adequate in providing a level of public transport that equates into a modal shift away from the private vehicle, and the policies are therefore unrealistic in a</p>   |

Monmouthshire context. There were various comments in relation to existing highway infrastructure not being adequate for the proposed new strategic developments set out in the Plan, with concerns raised in relation to traffic congestion that is currently being experienced, particularly in the south of the county, in relation to Land to the East of Caldicot North of Portskewett (Policy HA2) and Land at Mounton Road, Chepstow (Policy HA3).

Welsh Government also commented that the Sustainable Transport policies should address reducing parking levels in line with the Wales Transport Strategy.

**Monmouthshire's Sustainable Transport policies are underpinned by the Wales Transport Strategy (WTS), Future Wales 2040 and Planning Policy Wales (PPW), where there is a collective ambition for development to be located and designed in accordance with the Sustainable Transport Hierarchy. This WTS places an emphasis on development to be located and designed in way which ensures the reduction in the need to travel and a shift away from the private car for travel. The RLDP sustainable transport policies, therefore, reflect this national strategy, with the promotion of targeted new options, such as designing development to reduce the need to travel, improving active travel networks to maximise active travel connections and networks and providing electric vehicle charging, with digital infrastructure being part of development design.**

**The sustainable transport policies do, however, recognise that in rural areas without bus provision, the use of private cars may remain the only practical option. Policy ST1 clarifies that if a rural location is justified for a proposed development, a proportionate approach will be applied to such proposals and their ability to accord with national planning policy, including the Sustainable Transport Hierarchy. A small level of growth is allocated in the County's most sustainable rural settlements to address Objective 13 'Rural Communities' of the Plan and ensure Monmouthshire's rural communities and economy are sustained and supported.**

**The Plan directs most growth, including strategic site allocations, to Monmouthshire's most sustainable Primary Settlements, where there is access to, and provision of existing public transport facilities and active travel networks, and opportunities to connect and link with local and regional transport aspirations to support the modal shift away from the private vehicle. Monmouthshire's transport aspirations are set out in the Local Transport Strategy (LTS), which contains proposals to improve the County's train stations in Abergavenny, Chepstow and Severn Tunnel Junction, and support the new Magor Walkway Station in the Severnside area, as well as proposals to improve bus station infrastructure in Abergavenny, Chepstow, Severnside and Monmouth. The LTS also includes support for improvements to the active travel network within the County and support road improvement schemes, which include a link road from the B4245/M48 to Severn Tunnel Junction Train Station and improvements to Highbeech roundabout, Chepstow. The aforementioned road improvements, however, come under the operational jurisdiction of the Welsh Government, and MCC is working with Welsh Government and other regulatory bodies, such as Transport for Wales, to bring these transport schemes forward. Policy ST5 safeguards these transport schemes from any proposed development that may prejudice them coming forward.**

**In terms of the sustainable transport policies reducing parking levels, it is considered that policies S13 and ST1 allows for a flexible approach for considering parking requirements associated with new developments. Policy ST1 sets out that in town centre locations, car-free**

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|  | <p><b>development will be supported where practicable. It is anticipated that Supplementary Planning Guidance for the Council's Parking Standards 2013 will be reviewed and updated to ensure alignment with the WTS, Future Wales and PPW parking guidance.</b></p>   |
| <b>Retail &amp; Commercial Centres</b> | <p>The Retail and Commercial Centre policies were generally well received. Some concern was raised in relation to pressure from out-of-town developments and the existing centres, including changes made to the street scene.</p> <p><b>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 and is reflected in the Plan's policy framework. Strategic Policy S14 provides the overarching framework for new or enhanced retail, commercial and social developments. S14 includes a hierarchy ranging from Town Centres to Neighbourhood centres. In addition to retail policies, Strategic Policy S15 provides support for new local shops as community facilities outside of the identified centres. Any such proposals must adhere with policies S15 and RC4.</b></p> <p><b>In relation to the existing centres, town centre regeneration schemes will be supported by the retail policy framework within the RLDP where planning permission is required. However, any proposals relating to highways, which includes pavements, sit outside the scope of the RLDP process.</b></p>  |
| <b>Community Infrastructure</b>        | <p>Community Infrastructure policies were well received, with support in relation to protecting and enhancing community facilities, open spaces, allotments and growing spaces throughout the County. Concern was raised, however, that Monmouthshire's settlements lack community facilities, such as dentist and doctor surgeries and there is a lack of that open space, which is being exacerbated by the loss of open spaces to new housing developments, set out in the Plan.</p> <p><b>The RLDP has a duty to address all elements of sustainable development and community well-being, including the provision of homes and economic growth, and address Monmouthshire's core issues of affordable housing provision and rebalancing our demography and economic prosperity. In terms of building on Monmouthshire's green open spaces, it is recognised that previously developed land (brownfield) opportunities in Monmouthshire are limited, and greenfield opportunities have, therefore, been considered through the site selection process to meet our key housing and employment requirements. The greenfield site allocations are generally in private ownership and, as such are not publicly accessible open space, although in some cases there may be PROW across the land. The RLDP provides the policy framework to ensure public open space is provided as part of new development proposals, including the site allocations. This will increase access to open space, growing spaces and recreation for our communities. As part of a review of building an evidence base of open spaces throughout the County an open space audit (updated 2025) has been undertaken, which helps inform Policies CI2 and CI3, as well as an Area of Amenity Importance (AAI) review, which informs policy CI4.</b></p> <p><b>In reference to lack of doctor and dentist facilities, the mechanisms for improved health infrastructure sit outside of the planning process, however, the Council is fully engaged with the health board (ABUHB) to deliver health care service improvements across the County.</b></p> <p>In relation to Policy CI2 Provision of Formal and Informal Open Space and Allotments/ Community Growing Areas, which sets out formal and informal open space benchmark standards for settlements in Monmouthshire, based on the Fields in Trust (FIT) standard, it was commented that the FIT standard has been updated since the publication of the Deposit Plan and Policy CI2 should be amended accordingly. Others commented</p> |

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|                 | <p>that Policy CI3 which safeguards recreational facilities and open space in relation to the standards set out in CI2, should be stricter and remove the flexibility provided in criterion (b), which allows a loss of facilities/open spaces if it can be justified that there is an excess in the locality.</p> <p><b>It is acknowledged that the FIT standard has been updated in November 2024, since the Deposit Plan was written, and the policy requires updating, along with the Open Space Study. The policy and Open Space Study will be updated to reflect the updated FIT Standards</b></p> <p><b>The level of flexibility in Policy CI3 is considered reasonable and appropriate, allowing proposals to be considered for other uses if there is an excess of open space in a given area.</b></p> <p>There was some support for Policy CI4 Areas of Amenity Importance (AAI) noting the policy is clear in its approach. A number of representations received related to specific sites that had either been deleted as AAI or included as new areas of AAI. One of the sites deleted is located in Raglan and has planning permission for 21 homes, the other related to land outside the Magor development boundary.</p> <p><b>The site in Raglan was privately owned with no public access. The development of the site for housing will enable public access to the open space provided within the site which will benefit the local community. The open space provided throughout and to the north of the site will be considered for formal designation as an AAI in future Plans.</b></p> <p><b>In Magor, the AAI designation in the Adopted LDP to the north of Magor and Undy had a boundary that aligned broadly with the M4 safeguarding route. As there is no longer a need to protect the M4 safeguarding route, the boundary of the AAI was considered to be arbitrary and did not follow a particular defined boundary. A large proportion of this AAI was located outside of the development boundary in an area of open countryside. While it may have some informal use, it does not have a formal recreation use and due to its location does not meet the criteria to be designated as an Area of Amenity Importance as per the methodology set out in the AAI Review. In addition to this, the majority of the land is privately owned and is not accessible to the public. Paragraph 1.6 of the AAI Review refers to privately owned spaces, noting that such spaces are not accessible to the public and have been excluded from AAI as they do not fulfil the criteria for designation as AAI. Amendments have, therefore, been made to the boundary to exclude the northernmost section that is located outside the development boundary.</b></p> |
| <b>Minerals</b> | <p>Welsh Government noted support for the approach taken towards preparing the Former Gwent Statement of Sub-Regional Collaboration: Position Statement. However, the Minerals Product Association expressed disappointment that the requirement to prepare a Statement of Sub-Regional Collaboration has not been fully met and consider that the Former Gwent Sub-Region not being in a position to confirm how the regional minerals apportionment figures will be met to be unacceptable.</p> <p><b>The Mineral Planning Authorities (MPAs) that make up the Former Gwent Sub-Region have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC), however, it has not been possible at this stage to confirm how the regional apportionment figures will be met due to specific ongoing circumstances that are referenced in the Position Statement, such as the outcome of planning applications and candidate site submissions in the sub-region. These influence the sub-region's ability to establish what the shortfall is, making it premature to approach other authorities. The preparation of a Position Statement, to be monitored and updated as circumstances change, was therefore seen as a pragmatic way forward. This approach has been supported by Welsh Government in its representations on the</b></p>  |



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|              | <p><b>Deposit RLDP. The SSRC: Position Statement has, however, been updated to reflect updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix.</b></p>  |
| <b>Waste</b> | <p>The overarching sustainable waste management principles set out in Strategic Policy S17 were generally well received and supported, however, the potential environmental impacts of such developments were raised as a concern. Recognition that waste management is not limited to commercial and householder waste was raised, noting that agricultural waste is key in a Monmouthshire context.</p> <p><b>With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow and anaerobic digestion in rural locations.</b></p> <p>Objections were raised to a number of the employment allocations listed in policy W3 that have been identified as having potential for the location of in-building waste management facilities. Concerns focussed on requesting details of the type of waste and disposal process involved and the impacts these would have on the local environment.</p> <p><b>Planning Policy Wales (PPW) requires sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities.</b></p> <p><b>Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies.</b></p> <p><b>In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP along with any relevant environmental permitting requirements.</b></p> |
| <b>ISA</b>   | <p>Welsh Government recommended the LPA seek their own legal advice to ensure all of the procedural requirements have been met, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). They also stated a requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality if deemed appropriate.</p> <p><b>The LPA is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal.</b></p>   |



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|            | <p>Other objections in the main criticised the assessment of alternative sites and consideration of options, suggesting that alternative ‘scores’ should have been provided.</p> <p><b>The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP.</b></p> <p><b>The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring (‘quantitative analysis’) how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets.</b></p>   |
| <b>HRA</b> | <p>Welsh Government noted the need to demonstrate that the RLDP aligns with Natural Resources Wales’s (NRW) updated guidance relating to phosphates and nutrient neutrality. It also recommended that the Local Planning Authority (LPA) seek its own legal advice to ensure all legal procedural requirements have been met including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).</p> <p><b>The Local Planning Authority is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal.</b></p> <p><b>With specific reference to the HRA, this has been undertaken by AECOM Consultants and follows the relevant regulations appropriate to the stage of Plan being reviewed.</b></p> <p>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 and whether it has been satisfactorily demonstrated that proposed allocations would not have an adverse effect on the conservation objectives of the Bat SAC.</p> <p><b>An Addendum to the Habitats Regulations Assessment has been prepared by AECOM which assesses the impacts of the Deposit RLDP on the Wye Valley and Forest of Dean Bat Sites SAC. This concludes that with regard to the conservation objectives specific to the Wye Valley and Forest of Dean Bat Sites SAC, sufficient foraging habitat is maintained with minimal loss in suitable foraging habitat within the Core Sustainance Zone of designated roosts within the SAC as a result of the proposed site allocations in the Monmouth area. In addition, the RLDP contains policies both on a general and site-specific level, to control the impact on habitats bordering relevant proposals, including policy requirements to minimise the impacts of light spill and linear features that could serve as bat flight lines are protected. The HRA Addendum is therefore considered to have addressed the issues raised.</b></p> |

| RLDP Site Allocation                         | Main Themes/Issues Raised   |
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| <b>HA1 – Land to the East of Abergavenny</b> | <p>A significant number of representations were received in relation to the mixed-use allocation Policy HA1 – Land East of Abergavenny. Whilst the majority object to the proposed allocation, many support it as the focus for growth in Abergavenny. Key issues raised relate to the site not forming a logical extension to the settlement and there being no justification for its allocation and the resultant loss of greenfield land. The need for comprehensive masterplanning is recognised by both supporters and objectors.</p> <p>General impact on the landscape setting as well as more specifically on the Little Skirrid and Coldbrook Park were noted. Ecological impacts are also noted as an area of objection.</p> <p>A key issue raised is the connectivity of the site with the wider Abergavenny area and the incorporation and implementation of crossings over the A465 and railway.</p> <p>The general impact of the proposal on Abergavenny’s highway network was also raised, along with impact on infrastructure in the locality.</p> <p>The low level of employment within the proposal was a concern, with suggestions to increase it.</p> <p>The delivery of the site and its ability to deliver 500 homes in the Plan period was raised as a significant concern. The viability of the proposal given the level of infrastructure required, along with ownership concerns relating to the western section of the site were also raised as potential issues affecting the site’s delivery.</p> <p><b><u>Settlement Form</u></b></p> <p><b>The proposed growth level and spatial distribution set out in the RLDP, represents a sustainable approach to addressing our key 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. Spatially, the growth is considered to be well distributed throughout the County and 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 level of growth apportioned to Abergavenny is considered to be consistent with the findings of the SSA, which confirms the dominant role of Abergavenny in the County reflecting the range of services and facilities and sustainable transport options, including a train station, available to Abergavenny.</b></p> <p><b>Future growth within Abergavenny is constrained by a number of factors, including areas immediately north and west of the town adjoining the Bannau Brycheiniog National Park, some of which are proposed to be designated as green wedges, and the floodplain of the River Usk constrains development to the south of the town and in parts of Llanfoist. Having regard to these constraints and the site selection process, the allocation made under policy HA1 – Land to the East of Abergavenny, offers the opportunity to create a sustainable, affordable housing-led, mixed-use community that helps meet the objectives of the RLDP. In responding to the Deposit Plan, Welsh Government noted <i>the allocation signals the future direction of sustainable growth for the town during the plan period and beyond. The site is located close to the</i></b></p> |

*town centre and provides good public transport connectivity to Cardiff, Bristol and Hereford through the adjacent railway station. The schematic diagram demonstrates an appropriate mix of uses and provides an opportunity to promote transit orientated development in line with the policy objectives of Future Wales and Planning Policy Wales. In this respect, the allocation is considered to be appropriate and in accordance with national planning policy.*

#### **Masterplanning**

The masterplan accompanying HA1 – Land to the East of Abergavenny, is indicative with more detailed masterplanning to be undertaken as part of the ongoing progression of the proposed allocation. In addition to the indicative Deposit masterplan, there is a robust evidence base supporting the proposed allocation including a Placemaking Booklet, Density Framework, Land Use Framework and Movement Framework Plan. Significant masterplanning works have been undertaken to date by the site promoters having regard to the input from MCC Officers and the Design Commission for Wales to establish key placemaking principles and policy requirements as set out in policy HA1. The RLDP makes clear that the proposed allocation represents the longer-term intention for growth beyond the Plan period. However, the extent of future growth will be determined by the evidence base relating to a future plan period. It is, therefore, not considered appropriate at this stage to allocate/masterplan a larger area.

#### **Landscape Impact**

From a landscape and GI perspective, Policy HA1 criterion (f) states that ‘Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny’. As indicated in the indicative masterplan contained within the Deposit Plan for proposed site allocation HA1, land on the eastern boundary of the site is proposed to be retained as a nature area between the built development and the foot slopes of the Little Skirrid. In this respect, the high level masterplanning for the site allocation has responded to its landscape setting and further consideration of the potential impact on the Skirrid and the Little Skirrid will be undertaken through an Environmental Statement as part of the planning application process.

In terms of the potential impact on the BBNP, significant views will need to be assessed as part of the Landscape Visual Impact Assessment and Environmental Statement in terms of cumulative impact on landscape character and setting as part of the planning application process. This will be within the context of RLDP policies LC1 – Landscape Character, LC3 – Bannau Brycheiniog National Park (BBNP) and LC5 – Dark Skies and Lighting.

Strategic Policy S8 – Site Allocation Placemaking Principles and Policy HA1 – Land to the East of Abergavenny, along with policies S5 – Green Infrastructure, Landscape and Nature Recovery and the Development Management policies under this strategic policy within the RLDP will enable the Council to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

With regard to the impact on Coldbrook House Registered Historic Park and Garden, Cadw has noted that existing vegetation already provides some screening in relation to the view from the historic asset and careful design and additional planting should provide sufficient

screening to reduce any effect of development to an acceptable level. The RLDP policy framework and its key policy focus of requiring the significant use of green infrastructure to integrate development into the wider landscape, along with national planning policy and the relevant historic environment legislation, will ensure the setting of the registered park and garden is considered at the detailed planning stage.

#### Ecological Impact

With regards to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements, as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. MCC Ecology note that appropriate mitigation and compensation are required which will be agreed at the detailed planning stage.

In terms of potential impact on the River Usk nutrient sensitive catchment, the Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW confirmed that it is committed to delivering upgrades to the Llanfoist Wastewater Treatment Works (WwTW) to include phosphate stripping capability. It has advised that capacity will be available at the WwTW to accommodate foul flows from the proposed allocated upon completion of the upgrade scheme at the Llanfoist WwTW.

#### Highway Impact

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. A Transport Assessment has been undertaken in support of the site allocation, with further analysis to be provided at the planning application stage. Furthermore, Policy HA1 requires the proposal to be supported by a range of transport improvements including provision of pedestrian and cycle active travel linkages to key access points, incorporation of the existing Public Rights of Way and improvements to the public transport infrastructure associated with the site.

The proposal includes a proposed access point onto the A465, along with a secondary access point. Criterion m) refers to the secondary access being on to Garth Road. It is proposed to amend this to refer to 'the provision of a secondary access'.

#### A465/Railway Crossings

The integration of the strategic site with the wider Abergavenny area and associated facilities is a key principle of the proposal, along with the identification of connections over the railway line and A465. The site's proximity to Abergavenny train station provides the opportunity to create a sustainable development that promotes sustainable transport options in accordance with national planning policy. The proposal provides the opportunity to create a public transport interchange for both rail and bus and the provision of a park and ride facility. To facilitate this, Policy HA1 sets policy requirements including the repurposing and redesign of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line. Other measures include the incorporation and enhancement of Public Rights of Way footpaths and a network of pedestrian and cycle routes to increase permeability and connectivity.

Work has been conducted on the potential options to access the train station and to provide active travel routes to the wider Abergavenny area and these will be further considered as part of the planning application.

With regards to the potential relocation of the A465, this does not form part of the current proposal and would not be consistent with Welsh Government's current policy position on road building.

#### Amenity/Air Quality/Light Pollution Impacts

There are no Air Quality Management Areas designated within the Abergavenny area, although the impact on the Merthyr Road Bridge/Waitrose roundabout is being monitored. Air quality concerns are addressed in Policy HA1q) – which requires incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution. Specific concerns relating to light pollution impacting on the Bannau Brycheiniog National Park (BBNP) are addressed in Policy LC5 – Dark Skies and Lighting.

#### Drainage/Flood Risk

The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning policy on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. The inclusion of necessary surface water drainage systems will be a key element of the ongoing masterplanning for the site.

#### Development on Greenfield and Agricultural Land

Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development, including the provision of homes and economic growth, and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and jobs potential.

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

### Employment

The employment provision made within the strategic allocation under policies HA1 and EA1k – Land to the East of Abergavenny, is an integral element of the proposed mixed-use allocation, located at the western end of the site, opposite the train station, and as such has potential to serve both the development site and the wider Abergavenny area. The scale of provision reflects a balance between the creation of a sustainable community through the incorporation of a mixture of uses and an acknowledgement of the level of B1 Use Class provision that is needed to contribute to the overall employment land requirement over the Plan period.

The Town and Country Planning (Use Classes) Order 1987 (as amended) classifies B1 Business Use Class as being offices, research and development of products and processes, light industry appropriate in a residential area. The employment allocations have been informed by the Employment Land Review (Nov 2022), which recognises the important contribution B1 uses make to the local economy but concludes that B2 (general industrial) and B8 (storage and distribution) uses make up the majority of the employment requirement, which would not be appropriate in the context of the proposed residential-led, mixed-use allocation. In this respect, additional land for B1 use classes is not considered to be required as part of this site.

### Infrastructure Requirements

With regards to the provision of infrastructure, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.

With specific reference to education provision in the locality, MCC Education has indicated that there is currently capacity in both primary and secondary schools in the area to accommodate the proposed allocation. This will be reviewed at the planning application stage.

The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW has advised that a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades.

### Deliverability

Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.

In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.

In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.

#### Viability

A site-specific financial viability assessment (FVA) has been undertaken as supporting evidence to the proposal to ensure that the site is viable based on 50% affordable housing requirements along with other key policy requirements. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.

#### Western Parcel of Land

Extensive dialogue has taken place between the Council and the respective parties involved in bringing the proposed site allocation forward and these will be ongoing as the RLDP progresses to Examination and to the planning application stage. The indicative masterplan contained within the RLDP is considered to be deliverable having regard to land ownerships and the Council will continue to work with all relevant parties to secure the delivery of the site. The Council fully appreciates that Coldbrook Estates are seeking the inclusion of a larger area of land, promoted as part of the candidate site process in relation to candidate site submission CS0293, the outcome of which will be concluded as part of the Examination process.



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|   | <p><b>The RLDP recognises the placemaking benefits the western parcel of land contributes to the overall masterplanning of the site. The land provides an opportunity to contribute to placemaking and sustainable transport objectives through the incorporation of a potential park and ride facility and mixed-use neighbourhood centre, linking to Abergavenny Railway Station and the wider Abergavenny area. Given the placemaking benefits associated with this section of the allocation, the Council will explore all options available to deliver this land as part of the wider scheme.</b></p>  |
| <p><b>HA2 – Land to the East of Caldicot/North of Portskewett</b></p> | <p>A substantial number of representations were received concerning the affordable housing-led mixed-use allocation Policy HA2 - Land to the East of Caldicot/North of Portskewett. There was some support for the site, however, the majority of respondents object to the proposed allocation.</p> <p>Many commented on the size of the site and number of homes proposed, suggesting the Severnside area had reached capacity and also that the site could not be delivered within the timescales of the Plan period.</p> <p>The location of the site in relation to designated areas of ecological importance was raised, along with impact on protected species, habitats and the loss of agricultural land.</p> <p>The site's proximity to Caldicot Castle was of concern to many residents, as well as its location generally on the edge of Caldicot and Portskewett suggesting it would have an impact on the landscape.</p> <p>Some representors disputed whether the site related to Caldicot or Portskewett along with the name of the site.</p> <p>One of the key issues raised related to infrastructure requirements and the impact of the proposed site allocation on existing services that are already stretched, including education and healthcare.</p> <p>The impact of the site on the local road network and the Highbeech roundabout was raised by many, along with reference to limited public transport in the area.</p> <p>Others commented on the provision of footpaths and active travel routes, particularly in relation to links to the Town Centre.</p> <p>The site's potential impact on flooding, water and sewerage in the local area was of concern to many respondents.</p> <p><b><u>Site Selection</u></b></p> <p><b>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal (SSA) and is set out in Strategic Policy S2. The sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable affordable housing-led developments that provide well-connected and balanced communities. The SSA confirms the dominant role of the primary settlement of Caldicot including Severnside reflecting the range of services, facilities and sustainable transport available. The settlements in the south of the County, in particular, exhibit a strong geographical and functional relationship and collectively</b></p> |



form the Severnside area centred around the primary settlement of Caldicot and includes Portskewett along with Magor Undy, Rogiet, Caerwent, Sudbrook and Crick.

In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. The proposed site allocation at Land East of Caldicot North of Portskewett will form a new neighbourhood of Caldicot with links to Portskewett to the south/southeast. The inclusion of a primary school at the site will bring benefits for the wider community, serving both the new development and the nearby homes in both Caldicot and Portskewett. The inclusion of a mixed-use neighbourhood centre offers the opportunity to include other community uses such as a health centre, as well as small scale local convenience shop. The site will also include land for employment opportunities. The site includes strategic open space throughout that will be available for use by both the existing and future community, with links to nearby active travel routes. Importantly, the site will deliver the Plan's key policy objectives of 50% affordable housing and net zero carbon homes.

While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being greenfield Council-owned land. The inclusion of sites in public ownership is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. Through the site search sequence process Land to the East of Caldicot/North of Portskewett was considered the preferred option for development as a sustainably located, well-connected edge of settlement site to meet housing need in the area and enable the delivery of balanced communities. For further information please see the relevant Candidate Site Assessment Proformas.

#### Site Delivery

The housing trajectory is the key mechanism to demonstrate how sites will be delivered in the identified timescales, throughout the Plan period, to meet the RLDP housing requirement. At the housing stakeholder meeting it was suggested that the lead in times for first completions were overly ambitious due to the average length of time between submission of a planning application and first completions on the site. A fundamental part of the requirement to frontload the RLDP process is to ensure that the Plan as a whole is deliverable, including site allocations. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020), the site allocation is supported by a comprehensive suite of technical work to assist in frontloading the process and inform delivery of the site allocation within the Plan. There has been a continuing dialogue with the site promoters along with internal and external consultees during the preparation of the RLDP, which will significantly reduce the time taken to determine planning applications on the site.

Following ongoing dialogue with the site promoters it is proposed to update timescales with the first completions moved to 2028/29, however, they reaffirm that the 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.

It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.

Given the likelihood of multiple outlets across the site the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.

#### Ecological Impact

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA2 includes a number of criteria in relation to nature recovery including the Severn Estuary European Marine Site, the Nedern Brook Site of Special Scientific Interest and the Mount Ballan SINC. Criterion k) notes no built development is to take place in the SSSI.

Criterion j) relates to opportunities for grassland and hedgerow restoration, wetland creation and woodland connectivity to support protected species on the site. Criterion k) relates to the enhancement of grassland areas and enhanced native planting around ponds and wetland areas to support protected species.

A number of ecological surveys have been produced to date to support the allocation. Further ecological surveys will be undertaken and submitted at the detailed planning application stage.

The RLDP includes a specific policy (LC5) relating to dark skies and lighting that must be considered as part of a detailed planning application.

Criterion h) of Policy HA2 states that green space design must consider any emerging guidance for Suitable Alternative Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary. This will include consideration of the SSSI as Functionally Linked Land for overwintering birds. A Severn Estuary Recreation Strategy has been prepared which also considers SANG provision for this site.

#### Agricultural Land

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In their representation on the Deposit RLDP, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations

involving BMV and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. When considering the search sequence recommended in national planning policy, it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain.

#### Impact on Heritage

The impact of the development on the surrounding historic assets has been considered during the candidate site assessment process by colleagues in the MCC Heritage team. The proposed development is sufficiently far away from the immediate setting of the castle as not to have an adverse impact on its setting. The masterplan retains areas of parkland around the castle to ensure the wider setting of the asset is maintained and the new development is integrated within its surroundings. Further consideration of the Castle and its setting have been provided from Cadw. Cadw have reviewed the heritage assessment for the site and note development of the site is possible without causing a significant impact on the settings of designated historic assets.

Criterion g) of Policy HA2 provides reference to the adjacent Grade II Listed Building, Conservation Area, Country Park and views to the nearby Scheduled Ancient Monument. This notes that development should consider and respond positively to these heritage assets and that no built development will take place in these sensitive areas.

Part of the site is located in the Archaeologically Sensitive Area of the Gwent Levels, this relates to the area to the west of the former MOD railway line where no built development is proposed. Desk-based assessment and geophysical survey is required, prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

#### Landscape Impact

Strategic Policy S8 and Policy HA2, along with Policy S5 and supporting DM policies, will appropriately enable the Authority to address concerns of impact on landscape character and visual amenity.

Landscape and Visual Impact Reports have been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage. Separate requirements and tools under other legislation such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

Policy HA2 includes criterion e) which relates to development of the site considering existing topography, assets, features and contours of the site and also notes this should include measures to integrate development appropriately while reducing visual impact. Criterion e) of Policy HA2 also notes less dense development should be provided on the edge of the site.

The RLDP Strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales 2040. The site is located outside of this indicative area.

#### Site Name

It is recognised that the site lies across ward boundaries and is linked to both Caldicot and Portskewett, accordingly the site is named within the RLDP as Policy HA2 Land to the east of Caldicot/North of Portskewett.

#### Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. As a consequence, any site-specific infrastructure requirements for the proposed site allocations are set out within the individual site allocation policies and are also reflected in an Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advise that there is currently capacity in secondary schools within the locality, however, there is a lack of capacity in local primary schools. A new primary school is consequently proposed as part of the HA2 allocation which will serve both the existing and future residents in the area.

While health infrastructure isn't listed specifically for this site in the IDP, on-going discussions are taking place with Aneurin Bevan University Health Board (ABUHB). While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in delivering service improvements across the County as a whole. It is recognised that there is additional need in the South of the County in particular, and the Council is, therefore, working with ABUHB in identifying potential solutions and delivering a service on the Caldicot East North of Portskewett site.

The Council is implementing an ambitious town centre regeneration project for Caldicot Town Centre which will improve its attractiveness to businesses and the community.

#### Highways/Accessibility Considerations

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.

Regarding the road network, MCC Highways agree with the Transport Assessment produced to date but note that further information will be required at the detailed planning application stage. A Travel Plan has also been produced for the site and will be updated at the planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle.

With regard to Highbeech roundabout, Welsh Government have committed to delivering WelTAG 1 and 2 studies in collaboration with key partners, including Monmouthshire County Council and Transport for Wales, to identify and assess various options to improve transport

movements at this key intersection and Chepstow as a whole. MCC will continue to work with WG and other partner organisations on this matter.

In addition to this, criterion o) of Policy HA2 relates to the provision of off-site highway improvements as necessary, having regard to the requirements arising from the Transport Assessment and includes specific reference to footways required as part of the site, the revision of speed limits along Crick Road to 20mph and provision of a public transport link.

The site is served by bus route 73 (Newport-Caerwent-Crick-Chepstow). Criterion o) of Policy HA2 refers to the provision of a public transport link along Crick Road and throughout the site, details of which will be determined at the planning application stage. The IDP includes public transport financial contributions towards improved public transport and bus frequency.

#### Active Travel Links and Footpaths

Policy HA2 includes criterion n) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the new development area. This includes a key connection in the form of an active travel route to Caldicot Town Centre, along with a connection to the former MOD railway, cycle and walking route.

#### Flood Risk and Surface Water Run-Off Considerations

Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies the southern part of the site as being located within Flood Zone 2 and 3, however, this does not form part of the built development area of the site. Criterion p) of Policy HA2 reflects this noting that no built development will be permitted within the part of the site located in floodplain. Accordingly, Flood Consequences Assessments have been prepared for the site, and further detail will be considered as part of the planning application stage.

With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

#### Dŵr Cymru Welsh Water

Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and advised that there are no issues with accommodating the foul flows from the site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system and to inform the extent of any necessary water infrastructure and sewerage upgrades to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. This type of information would not be required until the planning application stage.

### **HA3 – Land at Mounton Road, Chepstow**

Land at Mounton Road, Chepstow (Policy HA3), generated a large consultation response to the proposal with over 300 respondents commenting on the proposed allocation. Although there was some support for the proposed allocation, with Chepstow Town Council commenting that members are positive regarding the progressive development of promoting the site, concerns were expressed regarding the infrastructure and there is a reluctance to support the development until transport congestion issues on Highbeech roundabout are fully addressed.

The majority of responses mirrored this concern that the existing highway infrastructure is not adequate to cope with further development in the Chepstow locality, in particular numerous representations related to traffic congestion at Highbeech roundabout.

Other concerns repeatedly raised in the representations included the loss of Best Most Versatile (BMV) agricultural land, loss of green wedge land, visual impact of the proposal upon the gateway to the Wye Valley National Landscape Area of Outstanding Natural Beauty (AONB) and surrounding heritage, detrimental impact to biodiversity, and exacerbation of air quality issues in the area, particularly as there is an Air Quality Management Area (AQMA) in close proximity to the site.

In relation to the proposal to include a hotel/ care home at the site, some responses did consider this as a positive, but others felt that a hotel was unnecessary due to existing hotels in the locality of Chepstow and nearby Tintern, which serves the Wye Valley National Landscape (AONB).

Some representations considered an alternative candidate site (CS0098) Land at Bayfield to be the preferable site for development in the Chepstow locality.

#### **Loss of BMV agricultural Land/Site Search Sequence**

**A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.**

**Despite a high proportion of BMV within the site, the site has been allocated as the preferred site in the Chepstow locality as the site performs well in terms of placemaking and accessibility criteria. Moreover, the site is being promoted as a mixed use development which has economic benefits to the County as a whole as well as employment opportunities to the residents of Chepstow reducing the need to travel/commute for work. The edge of settlement location near the gateway location/key travel routes into Chepstow's town centre also provides the opportunity to promote accessibility and connectivity into Chepstow's town centre.**

#### **Contrary to the Green Wedge Designation**

**As part of the RLDP process, green wedge designations in the current adopted LDP (2011- 2021) have been reviewed. As part of this, the assessment of the parcel of land (CPM10) that contains the proposed Mounton Road allocation concluded that 'the tree belt along St**

Lawrence Lane forms a strong boundary to the land south west, *and the A48 forms a boundary to the south east limiting the impact that development here would have on the adjacent land and on the remaining gap between Chepstow and Pwllmeyric. The parcel makes a moderate contribution to preventing settlement coalescence, managing urban form, safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a 'moderate buffer role.'* Therefore, the potential for green wedge designation is moderate.

A Green Wedge Review (2025) has also been undertaken to interpret and conclude the green wedge assessments undertaken by LUC. In line with the assessment evidence, the parcels of land have been considered for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12). It is concluded there is not a significant reason in context of the green wedge purposes that land parcel CPM10 should be retained as a green wedge designation. Is it, therefore, proposed to remove the green wedge designation. The removal of this parcel of land is also considered to align with national policy, whereby PPW notes that green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Ensuring 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 pressure in the area and the need to minimise demand to travel. For further information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025).

#### Highbeech Roundabout and Transport Infrastructure Concerns in Chepstow

In terms of concerns in relation to the capacity of Highbeech roundabout, the operational capacity of the Highbeech roundabout, which is under the jurisdiction of Welsh Government (WG) Highways, is a key consideration to the development proposal Land at Mounton Road. Welsh Government Highway Officers have been consulted on the proposed allocation and have not objected to the inclusion of the Mounton Road as a site allocation, subject to any development coming forward being in line with principles of the Wales Transport Strategy (WTS), the Active Travel Guidance Act and other relevant guidance. The WTS prioritises measures that maximise mode shift from the private vehicle off the highway network to measures that promote sustainable travel, which includes prioritising active travel (walking, wheeling, cycling) and public transport use. This is also reflected in national planning policy (PPW and Future Wales), as well as RLDP policies S13 Sustainable Transport and ST1 Sustainable Transport Proposals.

As well as consulting with WG Highway Officers, MCC commissioned a Strategic Transport Assessment (STA) which undertook modelling using the South East Wales Transport Model (SEWTM) to assess the potential impact of the proposed RLDP's housing growth on the highway network compared to the existing baseline movements. In relation to Chepstow, this indicated a 2-4% increase in localised traffic at Highbeech roundabout junction. It should be noted, however, that the modelling output is based on existing public transport and active travel provision and the analysis does not take into account the national policy aspirations to improve the public and active travel provisions and networks in Chepstow.

In reference to Chepstow and national aspirations to improve sustainable transport travel in the town, the Welsh Government are currently undertaking a funded strategic assessment, known as WelTAGs, which appraise different transport solutions based on deliverability, well-being and affordability considerations. Subsequently, there is a wider strategic approach to travel and traffic improvements within the settlement of Chepstow, which the Highbeech roundabout junction is part of, and goes beyond measures to



improve the roundabout, strategically assessing transport improvements to the town as a whole. Nevertheless, the allocation of Land at Mounon Road is in a unique position to identify and safeguard land in the southeast part of the site for potential improvements to the roundabout, if required. This is set out on the Indicative Masterplan and within Policy HA3 criterion (m).

Furthermore, as well as a national approach to drive transport improvements in Chepstow, Monmouthshire's Local Transport Strategy (LTS) sets out MCC's ambitions for transport improvements to Chepstow. These include active travel schemes and a Chepstow Transport Hub to improve both rail and bus linkages and frequency to and from the town with neighbouring settlements, including Severn Tunnel Junction and Bristol. These proposals, along with Highbeech Roundabout improvements, are safeguarded from development in Policy ST5 of the RLDP. Overall, further detailed Transport Assessments (TAs) are to be considered at the planning application stage. Where relevant, the detailed TA has the potential to be informed by the outcome of the Welsh Government's WelTAG assessments.

#### **Air Quality Considerations**

An Air Quality Assessment (Rapport, April 2024) submitted to support the allocation has demonstrated at this high-level stage of the proposal that air quality levels at the development site (new receptors) would be below the air quality objective levels in the opening year of 2026 and in future year scenarios.

Nevertheless, air quality impact will be further assessed as part of the planning application process and Policy HA3 criterion (n) of the Plan ensures this will be thoroughly assessed by including a specific policy requirement *for 'the incorporation of satisfactory air quality measures for mitigating and/or reducing emission measures.'* It is considered that key policy requirements such as net zero carbon homes, provision of ULEVs for electric vehicles and provision of active travel routes and public transport improvements will reduce emissions. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.

#### **Visual Impact of the Proposal upon the Wye Valley National Landscape (AONB)**

In terms of the visual impact of the proposal upon the gateway to the Wye Valley, a Landscape Visual Baseline (LVB) (EDP, February 2024) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that the site's landscape value is considered medium value and the site's immediate and wider context has a medium overall sensitivity to change. Subject to careful design at all stages and inclusion of the recommendations, there appears to be no landscape or visual reasons which would preclude development of the site. The planning application should be further informed by Landscape and Visual Impact Assessment, which would feed into an iterative design solution.

MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development. It is considered that with appropriate design and layout with development focused on eastern and north western boundaries of the site the proposed development is visually seen as extension of Chepstow's urban boundary. The design layout on the indicative masterplan seeks to retain and emphasise a parkland character by retaining this area as public parkland open space, a requirement set out in Policy HA3 criterion (g). The indicative masterplan also indicates an appropriate woodland buffer retained to the south west St Lawrence Lane boundary with the open countryside/green wedge setting/ setting with the Wye Valley AONB National Landscape, a requirement of Policy HA3 criterion (i). As



such, with these design principles to locate development towards the east of the site and protect and enhance the buffer with the open countryside setting, the landscape impact of the site is acceptable. These high-level landscape design requirements are set out in policies S8 and HA3 and are demonstrated on the submitted indicative Masterplan. Collectively, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies there are considered to be sufficient policy requirements to enable the authority to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will also help to ensure development is acceptable.

#### **Biodiversity Concerns**

The site contains groups of mature woodland and mature hedgerows which contain several important natural ecological habitats. The protection and preservation of these habitats is a key consideration in the development of the site. MCC's ecologists note that there are no 'in principle' constraints to the future development of the site subject to implementation of a sensitive masterplan design that incorporates appropriate inherent avoidance, mitigation and enhancement measures and provides net benefit for biodiversity. These policy requirements are set out in Policies S8 and HA3 criteria (j), (k) and (l) of the RLDP.

RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

#### **Heritage Concerns**

With regards to impact on historic character, the site is outside a Conservation Area, however, Mathern's Conservation Area boundary which includes Wyelands Historic Park and Gardens, is just to the south of the site boundary. The site is also within the parkland setting of the Grade II Listed St Lawrence House, which is located just to the north boundary of the site, along with several other characterful residential properties to the north. Cadw's consultation response to the proposal is that intervening vegetation already provides significant screening of the site from the registered Wyelands Historic Park and Garden and careful design should provide additional screening ensuring that the proposed development will not have a significant impact on their settings. MCC'S Heritage Officer's view is that the retention of the western edge of the site as open parkland on the indicative masterplan ensures the setting of the historic environment can be mitigated. This area is essential for the protection of the listed St Lawrence House and wider historic landscape.

#### **Need for a Hotel**

In terms of requirement for a hotel, the Council's Tourism Officer is supportive of the proposal, referencing that the Wye Valley is a prime location for supporting Monmouthshire's visitor economy/ economic growth strategy. This is also reflected within Monmouthshire Destination Plan (2017-2020) and Monmouthshire's Economy, Employment and Skills Strategy, which both support the growth of the tourism industry within Monmouthshire. The scale of commercial provision reflects a balance between the creation of a sustainable community and job provision/ support for Monmouthshire's economy.

#### **HA4 – Land at Leasbrook, Monmouth**

A significant number of representations were received concerning the affordable housing-led allocation Policy HA4 - Land at Leasbrook, Monmouth.

The location of the site in relation to designated areas of ecological importance was raised, along with impact on protected species, habitats and the loss of agricultural land.

General impact on the landscape setting was noted, as well as specifically on the Wye Valley National Landscape (AONB). Comments were also made in relation to the site's proximity to the Dixon Conservation Area and Dixon Mound Scheduled Ancient Monument.

The site's potential impact on flooding, surface water run-off and sewerage in the local area was of concern to many respondents, particularly in relation to the River Wye.

Concerns were raised in relation to infrastructure requirements and the impact of the proposed site allocation on existing services that are already overstretched, including education and healthcare.

The impact of the site on the local road network and proximity to the Dixon roundabout was raised by many, along with reference to limited public transport in the area and difficulty achieving active travel routes

#### **Site Selection**

**Regarding the location of development, in accordance with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP have been located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Monmouth is identified as one of the County's Primary Settlements.**

**In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. Within the context of the settlement hierarchy and having regard to the site search sequence outlined in national planning policy, Land at Leasbrook (Policy HA4) is considered to be a sustainably located edge of settlement site north of Dixon Road. Key facilities including Monmouth Town Centre, health care, schools and leisure facilities are all located within a 20-minute walking distance of the site, making it very accessible via existing footways and active travel links. The site benefits from close proximity to the Dixon Roundabout offering good links further afield when public transport or use of the private car is necessary. Importantly, the site will deliver the Plan's key policy objectives of delivering 50% affordable housing and net zero carbon homes.**

**While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6, 6.4.7 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. For further information please see the relevant Candidate Site Assessment Proformas.**

**Ecological Impact**

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA4 includes a number of criteria in relation to nature recovery. This includes two specific criteria d) and e) in relation to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. An additional woodland buffer is required to protect this species and will also offer an enhanced landscape buffer given the site's proximity to the Dixton Conservation Area and Lower Wye Valley Landscape of Historic Interest. A number of ecological surveys have been produced to date to support the allocation. Further ecological surveys will be undertaken with reports submitted at the detailed planning application stage.

The RLDP includes a specific policy (LC5) relating to dark skies and lighting that must be considered as part of a detailed planning application. Criterion d) also refers to the requirement of a lighting scheme and dark corridors being maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats.

**HRA**

In relation to the ecological concern for the Wye Valley and Forest of Dean Bat Sites SAC, an addendum to the Habitats Regulations Assessment has been prepared by AECOM to provide additional context for the conclusion of the HRA.

This was undertaken to provide an assessment of habitat and bat survey reports prepared for candidate RLDP sites and other available data including protected site condition and radio tracking assessments, for six allocated sites (those in Table 7 of the Local Plan HRA plus Rockfield Road, Monmouth) to assess the impact of loss of functionally linked land through the allocation of sites within the context of the current condition of the SAC and its conservation objectives.

The additional piece of work completed by AECOM more closely considers the principle of allocation and functionally linked land. In accordance with national policy and legislation, project level HRA will subsequently be undertaken to ensure that design and detail do not compromise the Protected Site.

The addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Leasbrook site in line with RLDP policies. It is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat sites will arise.

**Agricultural Land**

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the

development of such land via a different spatial strategy. In their representation on the Deposit RLDP, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. When considering the search sequence recommended in national planning policy, it is noted that most of the land surrounding Monmouth is of BMV status or floodplain.

#### Heritage Impact

The proposed development is set on the sloping hills to the north of Dixton adjacent to the existing development edge. The proposals are not considered to have a detrimental impact on the setting of the Monmouth Conservation Area as it is sufficiently far away from the boundary as not to be read as adjacent to the Conservation Area. Dixton Conservation Area has two distinct parts, north and south of the roundabout. The southern part is a small self-contained area around the church and school which given that it is separated by the road, would not be harmed by the proposed development. To the North is a collection of listed and unlisted buildings which would remain unaffected. The development will be informed by a development brief to ensure the fringes of the development are sensitively designed.

The original Candidate Site submission related to a wider area directly adjacent to the Dixton Mound SAM. The site has subsequently been significantly reduced in size, with the closest part to the SAM now approximately 190m from the site. An updated heritage impact assessment will be required to support any planning application on the site.

GGAT note a desk-based assessment and geophysical survey is required prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

#### Landscape Impact/Impact on the Wye Valley National Landscape

Strategic Policy S8 and Policy HA4, along with Policy S5 and supporting DM policies LC1- Landscape Character and LC4 – Wye Valley National Landscape (AONB), will appropriately enable the authority to address concerns of impact on landscape character and visual amenity.

A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage. Separate requirements and tools under other legislation such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

Policy HA4 includes criterion b) which requires development proposals to consider existing topography, assets, features and contours of the site and notes this should include measures to integrate development appropriately while reducing visual impact. This policy criterion also notes that less dense development should be provided on the northern and eastern edge of the site.

#### Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be

unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, the site-specific infrastructure requirements of the allocated sites are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advised that there is currently capacity in primary schools within the locality. There is, however, a need for contributions towards secondary school pupil places. The latest position with education will be reviewed at the planning application stage.

While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the Aneurin Bevan University Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole.

#### Highways/Accessibility Considerations

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.

Regarding the road network, MCC Highways agree with the Transport Statements produced to date but note that further information will be required at the detailed planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle.

Given that the entrance to the site is within an area of floodplain, an emergency access will be provided to allow for a secondary means of access if required in an extreme flooding event, details of which will be considered at the planning application stage.

In addition to this, criterion i) of Policy HA4 relates to the provision of off-site highway improvements as necessary, having regard to the requirements arising from the Transport Assessment, and also includes specific reference to junction mitigation/improvement measures and a public transport link if necessary.

The site could be served by a number of bus services. Consideration will be given to opportunities for service rerouting, details of which will be determined at the planning application stage. The IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency.

#### Active Travel Links and Footpaths

Policy HA4 includes criterion h) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the new development area. This includes key connections including a footpath link to

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|   | <p>Dixton Close and along Dixton Road which will enable links to further active travel routes in Monmouth. Space within the site boundary must also be included to allow provision of a future active travel route.</p> <p><b><u>Flood Risk and Surface Water Run-Off Considerations</u></b></p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies a small area on the southern part of the site as being located within Flood Zone 2 and 3, and while this does not form part of the built development area of the site, the access to the site is located in this area. Criterion j) of Policy HA4 reflects this noting that the development of the site must be suitably assessed in accordance with TAN15 including consideration of flooding in extreme events on Dixton Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application.</p> <p>With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p> <p><b><u>Dŵr Cymru Welsh Water</u></b></p> <p>Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and advised that there are no issues with accommodating the foul flows from the site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system and to inform the extent of any necessary water infrastructure and sewerage upgrades to ensure there is no detriment to existing customers' supply and that there is sufficient hydraulic capacity to accommodate the site. This information would not be required until the planning application stage.</p> <p>The IDP also includes the latest position in relation to upgrades to the Monmouth Wastewater Treatment Works (WwTW) to include phosphate stripping capability, noting this is included in AMP 7 2020 –2025. The impact of development on water quality will be scrutinised as part of the planning application process in consultation with relevant bodies, including NRW and DCWW, to ensure there are no adverse impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW.</p> |
| <p><b>HA5 – Land at Penlanlas Farm, Abergavenny</b></p> | <p>Comments received in relation with the proposed site allocation HA5 – Land at Penlanlas Farm, Abergavenny were predominantly objections from private individuals. Concerns raised focussed on the loss of a greenfield site and the potential impact on Bannau Brycheiniog National Park (BBNP) and general landscape. Concerns were also raised in relation to the approach taken to the Green Wedge designation in the locality of the allocation. The impact on ecology and loss of a SINC on a section of the site, along with the potential impact on the River Usk SAC and nearby Sugar Loaf SSSI/SAC was also raised.</p>  |

Highways concerns focussed on the unsuitability of Old Hereford Road to accommodate additional traffic and also within Abergavenny more generally. The proximity of the site to local services was also noted. Flood risk concerns from surface water run-off, both from above the site into the site and from the site to adjoining land, were raised. Potential noise and residential amenity issues from the adjoining electricity sub-station were also noted.

### **Site Selection/Greenfield Development**

**The overall spatial strategy of the Replacement Local Development Plan 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 County's primary settlements, including Abergavenny. Within this context and having regard to the site search sequence outlined in national planning policy, Land at Penlanlas Farm, is considered to represent a logical extension to the defined urban area of Abergavenny, benefitting from good connectivity to a range of services. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.**

**Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements.**

### **Green Wedge**

**With regard to the green wedge concerns, the Green Wedge Assessment, prepared by LUC (March 2024) as background evidence to the RLDP, assesses two parcels of land in the vicinity of the site allocation – AG9 and AG10 (see Green Wedge Assessment for a plan). In relation to parcel AG9, the assessment concludes that the land makes a moderate contribution to managing urban form, safeguarding the countryside from encroachment, protecting the setting of an urban area, and plays a moderate buffer role. It concludes that overall, the potential for green wedge designation is moderate. The proposed allocation at Penlanlas Farm is largely contained within parcel AG9.**

**With regard to parcel AG10, the assessment concludes that the parcel makes a strong contribution to managing urban form, safeguarding the countryside from encroachment, protecting the setting of an urban area, and plays a moderate buffer role. It concludes that overall, the potential for green wedge designation is moderate-high. The north-western section of the proposed allocation falls within Parcel AG10. However, as outlined in the GI Masterplan (March 2024) for the site, this land is to be retained as GI/public open space, retaining an open aspect to the north-western section of the allocation, consistent with the surrounding and adjoining green wedge designation. The built form of the proposed allocation is primarily within the 135m contour line with a proposed buffer between the site and the Bannau Brycheiniog National Park (BBNP) boundary. Its inclusion in the HA5 allocation is, however, important to providing access to the site and contributing to the site's net-biodiversity and green infrastructure requirements, as well as securing an appropriate buffer between the residential development and the national park/settlement edge of Abergavenny.**

**PPW 12 notes that green wedges may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. It notes that green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Ensuring 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 pressure in the area and the need to minimise demand to travel.

Having regard to PPW, the RLDP's growth and spatial strategy, the overarching site selection process, and the findings of the Green Wedge Assessment, a green wedge designation has been made on the north-western edge of Abergavenny, on land to the north of allocation HA5 – Land at Penlanlas Farm. Consistent with the approach taken to determining green wedge designations in the RLDP, which designates land with a moderate-high or above rating, Parcel AG10 is designated as a green wedge with the exception of approximately 1ha of land, which is within the boundary of allocation HA5, and as noted above is identified as a buffer zone.

#### **Bannau Brycheiniog National Park/Landscape Impact**

With regards to the landscape impact of proposed site allocation HA5 – Land at Penlanlas Farm, Abergavenny, in response to ongoing dialogue between the site promoters and the Council including the Landscape Officer, a reduced density from that proposed in the candidate site submission is proposed for allocation. The scale and proposed development area retains the visual integrity of the relationship between Abergavenny's urban boundary and that of the Bannau Brycheiniog National Park (BBNP) field slopes and upland landscape and is outlined in the site's supporting evidence. The site submission has responded to landscape concerns and brought the development primarily within the 135m contour line in areas to the south of the existing substation with a proposed buffer that can accommodate substantial tree and hedgerow planting.

Site specific policy HA5 seeks to ensure that the proposed site allocation integrates effectively and respects the proximity of the BBNP, existing setting and character. HA5 criterion (a) 'Incorporation of lower density development on the northern edge of the site and buffer zone to the north-west of the site to integrate it into the landscape' and HA5 criterion (c) 'Preserve or enhance the landscape setting of the BBNP and have no adverse impact on the International Dark Skies Reserve designation' provide development management ability to ensure that development layout, landscaping, colour and ridge heights take into consideration setting and impacts.

Collectively, Strategic Policy S8 – Site Allocation Placemaking Principles, Policy HA5 – Land at Penlanlas Farm, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies are considered to be sufficient to enable the authority to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will also help to ensure development is acceptable.

#### **Ecological Impact**

Having regard to the Preliminary Ecological Appraisal (August 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures, further details of which will be required at the planning application stage. Policies HA5 and S8 establish high-level policy requirements in this respect. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.



Approximately 2.5ha of land on the southern part of the site is identified as a Site of Interest for Nature Conservation (SINC) due to the presence of grassland. However, MCC Ecology section has confirmed that the SINC was destroyed after MCC consulted on the Adopted Local Development Plan (LDP). Whilst the candidate site assessment proforma notes that there was a SINC on part of the site, the Ecology team has since worked on the basis that it was destroyed, seeking instead to take the opportunity to restore grassland as part of the site's Green Infrastructure (GI).

The site is close to the Sugar Loaf Woodlands SSSI/SAC, which is noted for its woodland features. Potential recreational pressure on the Sugar Loaf SSSI/SAC has been considered as part of the Deposit Habitats Regulations Assessment which concludes that given the steep gradient of the SAC, this restricts visitor activities to the main paths and the site is under appropriate management by the National Trust, and the site's allocation will therefore not lead to adverse effects on site integrity regarding recreational pressure (page 63 – HRA, September 2024).

#### Highway/Accessibility Considerations

With regards to highway considerations, it is proposed to construct a new access onto Old Hereford Road, including the enhancement and widening of Old Hereford Road to provide the necessary carriageway width and inclusion of a 2m footway in accordance with Policy HA5 – Land at Penlanlas Farm. These arrangements are considered to be acceptable in principle with MCC Highways Section. The existing highway routes are also considered able to accommodate the associated traffic generation and distribution of traffic. Further Transport Assessments will be undertaken as part of the planning application process.

In terms of public transport provision, the allocation is in an area served by public transport, both bus and rail provision, with bus stops located on Llwynu Lane, Charles Crescent and Firs Road. Policy HA5 – Land at Penlanlas Farm, requires the incorporation of pedestrian and cycle linkages to key access points including the north-eastern corner of the site, south-eastern corner of the site and Old Hereford Road, linking up with the bus network.

#### Flood Risk and Surface Water Run-Off Considerations

The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

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|  | <p><b><u>Proximity to Electricity Sub-Station</u></b></p> <p>With regard to the proximity of the site to the adjoining electricity sub-station, Policy S8 – Site Allocation Placemaking Principles and Policy PM2 – Environmental Amenity, establish policy requirements to ensure residential/environmental amenity is addressed during the planning application process. A Noise Impact Assessment and appropriate mitigation measures such as a landscape buffer, tree planting and noise attenuation will be considered as part of the proposal.</p> <p><b><u>Impact on the River Usk SAC Catchment Area</u></b></p> <p>The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW confirmed that it is committed to delivering upgrades to the Llanfoist Wastewater Treatment Works (WwTW) to include phosphate stripping capability. It has advised that capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of the upgrade scheme at the Llanfoist WwTW.</p>   |
| <p><b>HA6 – Land at Rockfield Road, Monmouth</b></p> | <p>The number of responses received in relation to Land at Rockfield Road, Monmouth (HA6) were limited. Some support for the site was provided, noting it is in a discrete location with good active travel links to nearby industrial estates and the town centre.</p> <p>Concerns were raised in relation to flooding impact, strain on infrastructure, loss of green space and increase in traffic. Some reservations were noted concerning the access of the site.</p> <p><b><u>Site Selection</u></b></p> <p>Regarding the location of development, in conformity with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP are located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Monmouth is identified as one of the Primary Settlements. Within this context and having regard to the site search sequence outlined in national planning policy, Land at Rockfield Road, Monmouth is considered to represent a logical extension to the defined urban area of Monmouth, benefitting from good connectivity to a range of services. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives and facilitates the delivery of a range and choice of sites within the Plan period.</p> <p><b><u>Infrastructure</u></b></p> <p>Planning Policy Wales (2024) notes that where new housing is proposed developers, will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, site-specific infrastructure requirements of the proposed site allocations are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plan's sites allocations and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education</p> |

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|  | <p>requirements. MCC education advised that there is currently capacity in primary schools within the locality. There is, however, a need for contributions towards secondary school pupil places. The latest position with education will be reviewed at the planning application stage.</p> <p>While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the Aneurin Bevan University Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole.</p> <p><b><u>Flood Risk and Surface Water Run-Off Considerations</u></b></p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies a small amount of flood zone along the boundary of the site. As a consequence, a Flood Consequences Assessment has been produced and colleagues in the Flooding and Drainage Team are satisfied this is suitable for allocation of the site and will be considered further at the planning application stage once full details of the site are known.</p> <p><b><u>Site Access</u></b></p> <p>The housing site is not proposed to be accessed via Kingswood Road. It is proposed to construct a road access into the adjacent site with extant planning permission for 70 homes, which will be accessed directly from Rockfield Road. This arrangement is considered to be acceptable with MCC Highways, who note the site junction and the impact of development traffic on the immediate local network would be acceptable.</p> |
| <b>HA7 – Land at Drewen Farm, Monmouth</b>         | <p>A limited number of responses were received in relation to Land at Drewen Farm, Monmouth (Policy HA7).</p> <p>The concerns raised related primarily to the access of the site through the first phase of the site at Kingswood Gate. The potential for flooding was noted, including increased surface water flooding.</p> <p><b>The Land at Drewen Farm, Monmouth (Policy HA7) forms the remaining part of the adopted LDP Wonastow Road housing site in Monmouth known as Kingswood Gate.</b></p> <p><b>This site was granted outline planning permission on 09/09/2025 for the development of up to 110 homes under the reference DM/2024/01295 subject to signing of a S106 agreement.</b></p>   |
| <b>HA8 – Land at Tudor Road, Wyesham, Monmouth</b> | <p>The Land at Tudor Road, Wyesham (Policy HA8) allocation did not receive any comments.</p> <p><b>The proposed allocation at Land at Tudor Road, Wyesham is a site allocation that has been rolled forward from the adopted LDP.</b></p> <p><b>This site was granted planning permission on 26/03/2025 for the development of 50 affordable homes under the reference DM/2024/00557.</b></p>   |

## **HA9 – Land at Former MOD, Caerwent**

Comments received in relation to proposed site allocation Land at Former MoD, Caerwent (Policy HA9) included some support given the site is previously development land and is proposed for mixed-use development, including employment uses. However, a number of concerns were raised in relation to the impact on the biodiversity (due to protected and priority species being within the site) and highway safety concerns were raised with the site being accessed off the dualled A48 highway. Concerns were also raised in relation to the cumulative impact of the development in the area upon infrastructure, with this proposal alongside other strategic sites identified in the Severnside area (HA2 – Land east of Caldicot North of Portskewett and HA3 – Land at Moun-ton Road, Chepstow). Further concerns were noted with regard to surface water drainage, foul waste, environmental health (with regard to potentially developing on contaminated land and immediately adjacent to MOD land), and visual impact on Caerwent’s Roman Village.

### **Site Selection**

**The support for the brownfield allocation at Caerwent is welcomed. The Plan’s site search sequence has prioritised the use of suitable brownfield sites before considering greenfield sites, albeit it is recognised that brownfield sites are limited in the County. The site, therefore, is considered to be suitable for development in the Severnside Region as is one of the County’s only brownfield sites. As a mixed-use allocation, the site includes B1 employment use (as well as residential use) which will provide economic opportunities in the local area, supporting sustainable economic growth.**

### **Ecological Impact**

**In relation to concerns regarding the destruction of the existing habitats on the site, there are policies in place in the RLDP, as well as national legislation, to safeguard and protect these habitats. Collectively, Policy HA9 criteria (d)-(g), Policy S8 – Site Allocation Placemaking Principles, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and NR1 Nature Recovery and Geodiversity are considered to be sufficient to enable the authority to maintain and protect habitat population species. Separate requirements and tools under other legislation, if required, such as The Environment Act (Wales) 2016 Section 6 Duty and PPW12 will also help to ensure development has an acceptable impact upon biodiversity considerations.**

### **Highways Impact**

**In terms of the highway concerns raised, a Transport Assessment (Asbri Transport Ltd. Jan 24) has been submitted which concluded that the proposed land use would result in a negligible change in traffic flows on the local highway network. Where the impact is greatest, at the site access, the operation of the highway network is not negatively impacted. Further analysis and consideration of the vehicular access design arrangements and safe pedestrian crossing to access the south of the A48/connection to Caerwent Village is required, as set out in Policy HA9 criterion (h), as well as Policy S8. These matters will be further considered and addressed at the planning application stage.**

### **Impact on Local Infrastructure**

**With regard to the cumulative impact of the allocation with other strategic allocations in the south of the County, the infrastructure required to support these allocations has been thoroughly assessed. An Infrastructure Delivery Plan (IDP) set out in Appendix 8 of the Plan, identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of a sites. It is also relevant to note that there are wider improvement schemes being investigated to improve infrastructure provision in the Severnside area, for example the public transport services and active travel routes between the settlements in Severnside with potential to**

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|  | <p>connect to Caldicot , particularly with the opportunity to do so with the strategic site development of HA2 Land to the East of Caldicot/North of Portskewett allocation.</p> <p>In terms of the foul waste, DCWW have confirmed the delivery of a scheme at Caerwent's Welsh water Treatment Works (WwTW) by January 2027 and accordingly have advised that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of a scheme. DCWW also advise that a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system. The developers will be expected to fund investigations during pre-planning stages and the findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended).</p> <p><b><u>Drainage</u></b></p> <p>In terms of surface water drainage, the preliminary site investigation work has indicated surface water outfall over third party land. MCC's Drainage Officer has specified that the proposals will require further SuDS features and there should be multiple basins and swales across the site, which is set out in Policy S8. Further drainage details are to be determined through the Sustainable Drainage Approving Body (SAB) process and the planning application assessment process.</p> <p><b><u>Amenity Impact</u></b></p> <p>Air quality and noise assessments will be required due to the site's close proximity to the A48 and the close proximity of the MOD training centre. Environmental health considerations including air, noise and lighting impacts will be further assessed as part of the planning application process. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.</p> <p><b><u>Heritage Impact</u></b></p> <p>With regard to the impact on Caerwent's historic village, it is both Cadw's and MCC'S Heritage Officer's view that due to the existing intervening vegetation and separation from the Roman Town by the A48 highway, any effect of the development upon Caerwent's historic character and nearby Scheduled Ancient Monuments will be minimal.</p> |
| <p><b>HA10 – Land South of Monmouth Road, Raglan</b></p> | <p>Comments received in relation to proposed site allocation HA10 – South of Monmouth Road, Raglan were predominantly objecting to its inclusion in the RLDP as a housing allocation. The concerns raised focussed on the need for the allocation in the first instance and the resultant loss of greenfield and Best and Most Versatile Agricultural Land. The allocation is also considered to be contrary to a previous appeal decision to refuse 111 houses on land that incorporates the allocation.</p> <p>The heritage impact on Raglan Conservation Area and Raglan Castle and were also raised as significant concerns with the allocation. Ecological concerns due to the loss of a greenfield site are also noted. Concerns with the general infrastructure to accommodate the site and more specifically the highway network were also raised. Reference to the site regularly containing surface water run-off and the impact developing the land in relation to flood risk were noted.</p>  |

**Site Selection/greenfield development/loss of Best and Most Versatile Agricultural Land**

The overall spatial strategy of the Replacement Local Development Plan 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 County's primary settlements, with the majority of growth directed to these. However, a lower level of growth is directed towards the County's Tier 2, Secondary Settlements, to deliver much needed affordable housing along with addressing the RLDP's core objectives of rebalancing our demography and supporting sustainable economic growth whilst responding to the climate and nature emergency. Within this context and having regard to the site search sequence outlined in national planning policy, Land South of Monmouth Road, Raglan is considered to represent a logical extension to the defined urban area of Raglan, benefitting from good connectivity to Raglan's centre and associated services and facilities. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.

Baseline information relating to key design and placemaking principles have been established as part of the on-going dialogue between the Council and the site promoters, with an indicative parameters plan that has evolved informing the spatial layout and constraints, requirements and opportunities. The proposed scale of development is considered appropriate within the context of the overarching growth and spatial strategy and Raglan's position as a Tier 2 settlement, allowing for a proportionate level of growth to address the RLDP core objectives.

Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development, including the provision of homes and economic growth, and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework.

Similarly, a key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV land, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV land will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.

**Minister for Housing and Local Government's Decision to refuse permission for 111 dwellings on the site**

Planning application DM/2018/01050 for 111 dwellings on land including the proposed allocation was refused on appeal in 2019 following a decision by Welsh Government to call-in the planning application to be determined by Welsh Ministers. The decision letter issued on 3rd October 2019 by the Minister for Housing and Local Government concluded that "the present need for housing that has been identified,

when taking account measures to secure a replacement LDP, does not justify permitting the scale of development on the edge of this rural village. In reaching this conclusion, the Inspector is mindful of the primacy of the development plan in decision making, not least given the degree of certainty, transparency and engagement this provides to all stakeholders, including local communities.”

Having regard to the Minister’s Letter, the site has been promoted through the candidate site and Replacement Local Development Plan process and has been subject to consultation, and as noted above, is justified within the context of the RLDP’s overarching strategy and, therefore, addresses the concerns of the Inspector in refusing permission. Furthermore, a reduced area to that submitted as part of the candidate site process, of 4.5ha, is proposed for allocation, representing a proportionate level of residential growth appropriate to Raglan’s positioning in the settlement hierarchy.

#### Heritage Impact

MCC’s Heritage Officer has advised that key vistas and sightlines will be maintained allowing the Castle to remain as a key landmark. This will maintain the integrity of Raglan’s Conservation Area and the setting of Raglan Castle. Through the integration of placemaking principles and enhanced green infrastructure and other policy requirements set out in Policy HA10 including limitations on building heights, the proposed allocation is not considered to detrimentally harm the setting of the Castle or wider views.

#### Highways Impact

MCC highways has confirmed that the traffic analysis submitted indicates that the additional traffic generated by the proposed development will be negligible and the impact on the safety and capacity of the surrounding highway network is expected to be minimal. In addition, the site is served by public transport, with bus stops located on Monmouth Road. Policy HA10 – Land South of Monmouth Road, Raglan, requires off-site highway infrastructure improvements including the widening and improvement of the existing footway on Monmouth Road and a financial contribution to improve public transport services and nearby infrastructure as required. Details of this will be determined at the planning application stage.

The incorporation of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points is a policy of requirement of Policy HA10 – Land South of Monmouth Road, which will provide access beyond the site boundaries.

#### Ecological Impact

Having regard to the Preliminary Ecological Appraisal (September 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures, further details of which will be required at the planning application stage. Policies HA10 and S8 establish high-level policy requirements in this respect, with specific nature recovery policy considerations set out in NR1 – Nature Recovery and Geodiversity. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity.

#### Flood Risk and Surface Water Run-off



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|   | <p><b>The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</b></p> <p><b>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</b></p> <p><b><u>Impact on Local Infrastructure</u></b></p> <p><b>With regards to the provision of infrastructure, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. It sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans site allocations.</b></p> <p><b>The Council has and will continue to work with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW advised that capacity is available at the Raglan WwTW to accommodate foul flows from the proposed allocation.</b></p> |
| <p><b>HA11 – Land East of Burrium Gate, Usk</b></p> | <p>Land East of Burrium Gate, Usk, raised a large consultation response to the proposal and although there was some support for the provision of 50% affordable homes in the locality where house prices are high, concerns were raised as to whether the provision of 50% affordable homes was viable and whether the proposed affordable homes would go to local people. Some concerns were noted with regard to appropriate transport and sewerage infrastructure being in place to support the development. There were also concerns in relation to flood risk, including that the proposed development of the site would exacerbate flood risk in the area, and to existing properties in close proximity.</p> <p>Other concerns raised included the visual impact of the proposal on the setting of Usk due to loss of greenfield land and the site's elevated position, impacts on protected habitats and the adjacent SINC, and nutrient pollution concerns of the River Usk Special Area for Conservation (SAC). Traffic and pollution concerns were also noted, particularly as there is an Air Quality Management Area (AQMA) in close proximity to the site.</p> <p><b><u>Provision of Affordable Homes</u></b></p> <p><b>The provision of affordable housing is a key objective for the Council which is reflected in the RLDP's objectives and policy framework, with a requirement for 50% affordable homes on new site allocations. The RLDP aims to secure its deliverability through the policy requirements set out in Policy S7 Affordable housing and Policy S8 Site Allocation Placemaking Principles. Site promoters of the site allocations have</b></p>   |



completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, and other key requirements, without subsidy.

With regards to the allocation of affordable housing to local people, the Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, such as Usk. The rural allocations policy provides additional criteria to demonstrate rural local connection to a particular area.

#### Flood Risk and Drainage Considerations

In relation to the flooding and drainage concerns, the Flood Map for Planning does not identify any flood zones on the site. The Strategic Flood Consequence High Level Assessment also concludes that the site's location is outside identified flood risk areas. Nevertheless, concerns have been raised with regard to the management of overland flows of water and impact this may have on land outside of the site, which will be required to be taken into consideration within the flood consequence assessments for the planning application. This requirement is set out in the policy requirements for the site Policy HA11 criterion (f) 'A scheme for the management of overland flows from adjacent land will need to be included to ensure existing overland flood risk has been accommodated'.

With regard to surface water drainage management of the site, the preliminary site investigation work has indicated surface water outfall over third party land. MCC's Drainage Officer has specified that the proposals will require further SuDS features and there should be multiple basins and swales across the site, which is stipulated in Policy S8. The drainage details will also be required to the assessed and agreed through the Sustainable Drainage Approving Body (SAB) process, a separate regulatory framework which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. Development will not be able to take place unless there is a SAB approval as well as planning consent.

#### Landscape Impact

In terms of the elevation/topography and visual impact assessment of the site, a preliminary Landscape Visual Appraisal (LVA) (RPS August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that subject to careful design at all stages and inclusion of the recommendations there appears to be no landscape or visual reasons which would preclude development of the site. MCC's Landscape Officer has reviewed this information and considers the site to be suitable for residential development. It is considered that with retention of existing hedgerow boundaries and a design that responds to the site's topography with a development ridgeline of no more than 40m Above Ordnance Datum (AOD), a proposal can be integrated effectively into the landscape as an urban extension to Usk. These high level landscape design requirements are set out in policies S8 and HA11 criterion (a) '*Any future planning application should be further informed by Landscape and visual impact assessments, which would feed into an iterative design solution.*'

#### Ecology Impact

In relation to the protection of habitats at the site, a Preliminary Ecological Appraisal has been submitted which has appraised the site for its ecological value and has been reviewed by MCC ecologists, who consider the site is suitable for residential allocation with appropriate mitigation and compensation, further details of which will be required at the planning application stage. Furthermore, there are policies in place in the RLDP as well as national legislation to safeguard their protection. Collectively, Policy HA11 criteria (b) and (c) and Policy S8 – Site Allocation Placemaking Principles, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and NR1 Nature Recovery and Geodiversity are considered to be sufficient to address concerns of protecting habitat population species. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Further detailed habitat survey work and assessments will be required at planning application stage.

#### River Usk Special Area for Conservation (SAC)

With regard to phosphate neutrality obligations for the River Usk, NRW have completed an environmental permit review and confirmed that the consent limit of 5mg/l is applicable for the treatment of foul flows. With this permit information, DCWW has confirmed a commitment that it is delivering a scheme to upgrade Usk's Wastewater Treatment works (WwTW) and accordingly advise that capacity (the 5mg/l consent limit set by the permit) will be accommodated at Usk WwTW, upon completion of the upgrade scheme. On a more general level, all proposals are required to satisfy Policy NR3 –Protection of Water Sources and the Water Environments and development proposals will be assessed in consultation with NRW who are the regulatory body for ensuring that there is no unacceptable impact on the water quality of the River Usk SAC River.

#### Highway Impact

In terms of traffic impact, a Transport Statement (Norman Rourke Pryme, March 2025) has been submitted which has provided initial evidence that the highway network is capable of accommodating an additional 40 dwellings. Further analysis and consideration of the proposed vehicular access design arrangements, and safe pedestrian crossings and the widening of the existing footways along Monmouth Road, will be undertaken at the planning application stage. This is a requirement of Policy HA11 criterion (d). The proposal will also be required to accord with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and opportunities to facilitate a modal shift from the private car to sustainable forms of travel. The site will therefore be designed to maximise sustainable travel opportunities to the town centre, as reflected in Policy S8 and Policy HA11.

#### Amenity Impact

In terms of exacerbating existing environmental problems and air quality concerns, Policy HA11 criterion (e) requires the incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Moreover, it is considered that key policy requirements, such as net zero carbon homes, provision of ULEVs for electric vehicles and active travel routes, together with public transport improvements will reduce emissions and provide the catalyst for behaviour change and improve the health and well-being of people. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.

## **HA12 – Land West of Trem Yr Ysgol, Penperlleni**

Comments received in relation to proposed site allocation HA12 – Land West of Trem Yr Ysgol, Penperlleni were predominantly objections from private individuals. One of the main concerns raised was the proposed access arrangement of the site, which is proposed off the existing cul-de-sac highway Trem Yr Ysgol (a recent new build residential development in Penperlleni that was allocated in the current adopted LDP SAH10(ii)). A private management company manage and maintain the green open space that the proposed access of the site is to be constructed across, funded by residents of the recent development. There is a legal agreement in place for the management company to manage this open space. Other concerns raised relate to highway safety (vehicles would travel past the school and through the existing housing development to access the site), the site not being located in a sustainable location, flooding due to existing watercourses on the site, wildlife and environmental impacts, as well as landscape impact upon the surrounding Bannau Brycheiniog National Park and capacity of the sewerage infrastructure within the site. There were also concerns raised in relation to the Deposit Plan consultation and transparency of the process.

### **Access Concerns and Highway Impact**

**In response to the access concerns, the point of access into the site is still being considered off Trem Yr Ysgol, and an alternative option of direct access off the A4042 is also being explored with Welsh Government Highways.**

**In terms of highway capacity, MCC highway authority has indicated they would not object to the extension of the existing estate road to serve an additional 42 dwellings but it is essential that sustainable travel options are accessible and provided, and it must be clearly demonstrated that the estate road can accommodate the increased levels of traffic and that adequate off-street parking can be provided to avoid obstructive on-street parking. Further assessment and consideration of the access and highway safety considerations are required with a submission of a Transport Assessment.**

### **Sustainable Location Concerns**

**The overall spatial strategy of the RLDP 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 County's primary settlements, with the majority of growth directed to these. However, a lower level of growth is directed towards the County's Tier 2, Secondary Settlements, to deliver much needed affordable housing along with addressing the RLDP's core objectives of rebalancing our demography and supporting sustainable economic growth whilst responding to the climate and nature emergency. Within this context and having regard to the site search sequence outlined in national planning policy, Land West of Trem Yr Ysgol is considered to represent a logical extension to the defined urban area Penperlleni, located in close proximity to Penperlleni's existing facilities and services.**

**The edge of settlement location provides the opportunity to promote sustainable travel and connectivity into Penperlleni for some facilities, such as the local primary school and village shop, public house which are less than a 10 minute walk away. The site is in an area served by bus Public Transport. There is a southbound stop within 400m of the site and the design of the site must prioritise connections to public transport as set out in Policy S8 and HA11 (d) which specifies a pedestrian link to the southbound bus stop. A financial contribution towards improved connections to public transport maybe required and further consideration of this will be undertaken as part of the planning application process.**

**Flood Risk and Drainage Considerations**

With regards to flooding and drainage concerns, the Strategic Flood Consequence High Level Assessment concludes that there are minimal flood risk considerations to the allocation with 0% of the site is within Zones 2 & 3 for Sea and Rivers and 1.87% of site are within Zones 2 & 3 Surface Water. Flood risk at this site is, therefore, considered minimal and in accordance with TAN15 (2025). MCC's Drainage Officer has assessed the information and confirmed that surface water drainage can be managed at the site. The drainage details will also be required to be assessed and agreed through the Sustainable Drainage Approving Body (SAB) process, as separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government.

**Ecology Impact**

In relation to wildlife and habitat concerns, a preliminary Ecological Appraisal has been submitted which identifies the site as having priority hedgerows, mature trees, protected species potential and an ecologically important watercourse. The protection and preservation of the watercourse, site hedgerows and mature trees are therefore key considerations in the development of the site. These policy requirements are set out in S8 and HA12 (b) and (c) of the RLDP. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

**Landscape Impact**

With regard to landscape impact on the BBNP, a preliminary Landscape Visual Appraisal (LVIA) (Viridian Landscape Planning August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined the landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. MCC's Landscape Officer considers the site from a landscape perspective to be suitable for residential development, with the value of the surrounding landscape being its setting within the backdrop of the BBNP. It is considered that with retention of existing hedgerow boundaries and a design that responds to key views of the BBNP, development can be integrated effectively into the landscape as an urban extension. These high level landscape design requirements are set out in policies S8 and HA12 criterion (a), as well as landscape policies LC1 Landscape Character and LC3 Bannau Brycheiniog National Park.

**Watermains Pipe**

The site promoter and LPA are aware of the watermains pipe that runs through the northern section of the site, and development will be outside the buffer easement of the pipe. The masterplanning of the site will be done in consultation with Dŵr Cymru Welsh Water, the regulatory body of the watermains and they will advise on the buffer requirements.

**RLDP Consultation and Candidate Site Assessment Process**

With regards to the concerns over the consultation and candidate site assessment process, the RLDP has been prepared in accordance with relevant legislation and regulations. Of note, the RLDP Delivery Agreement (DA) (Revised October 2024) sets out the timetable for Plan preparation and the Community Involvement Scheme (CIS). The CIS sets out how the Council proposes to proactively involve the community

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|   | <p>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. In accordance with the DA, the Council undertook extensive consultation and engagement with stakeholders and our local communities during the public consultation on the Deposit RLDP. This included numerous drop-in engagement events throughout Monmouthshire. As part of that consultation a range of views and considerations have been captured and addressed in the Consultation Report on the Deposit RLDP. There will be further opportunity for representors to discuss issues raised at the examination of the RLDP.</p> <p>The Candidate Site Assessment process is based on the SEWSPG (South East Wales Strategic Planning Group) proposed methodology which seeks to establish a common baseline methodology in relation to candidate sites for South East Wales local planning authorities to adhere to when preparing their RLDPs. The SEWSPG approach has been adapted to suit local circumstances in Monmouthshire and updated to reflect guidance in the Welsh Government Development Plans Manual Edition 3 (March 2020). For further information on the candidate sites process refer to the Candidate Sites Assessment Methodology, the Candidate Sites High Level Assessment and Candidate Site Assessment Report.</p>   |
| <p><b>HA13 – Land adjacent to Piercefield Public House, St Arvans</b></p> | <p>Comments received in relation to proposed site allocation HA13 – Land adjacent to Piercefield Public House, St Arvans were predominantly objections. Concerns raised related to the need for the allocation, due to the close proximity of the strategic site allocation HA3- Land at Mounon Road Chepstow, impact on the surrounding biodiversity, and the potential impact upon the surrounding Wye Valley National Landscape (AONB). Several concerns were also raised in relation to its impact upon Regionally Important Geodiversity Sites (RIGS) as it is part of the catchment of groundwater for the underlying Otter Hole cave system.</p> <p><b><u>Need for the Allocation/ Site Selection</u></b></p> <p>The site adjacent to the Piercefield Public House, St Arvans, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and 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. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).</p> <p>The edge of settlement location near St Arvan's settlement also provided the opportunity to promote accessibility and connectivity to facilities in St Arvan's including the local public house, church, and recreation facilities such as playing fields and public open space. Chepstow Town Centre is also in close proximity, approximately 1.8 miles away, providing access to a wide range of services and facilities, including retail and leisure facilities, primary and secondary schools and Chepstow's Train Station. There are exiting sustainable travel links to Chepstow with provision of a bus service, and it is considered to be within reasonable distance, as per the Active Travel Wales guidance, to walk/cycle into Chepstow. The site is, therefore, considered to be suitable for small scale residential development within this context and having regard to the site search sequence.</p> |

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|   | <p><b><u>Biodiversity Impact</u></b></p> <p>In terms of impact on biodiversity, a Preliminary Ecological Appraisal (aspect ecology 2021) has been submitted which has identified the site as unmanaged scrubland vegetation of limited ecological importance. The invasive Japanese knotweed is present within the site which is detrimental to the site value. Development of the site would allow for the eradication of this species, therefore, providing enhancement to biodiversity. This will be controlled through the planning application process. The site has also been identified as having Protected and Priority Species present, however, MCC's ecologists have confirmed that their presence is unlikely to prevent development if appropriate mitigation and compensation is provided and that the site has the potential to provide net benefit for biodiversity, further details of which will be provided at the planning application stage. Policies HA13 and S8 establish high-level policy requirements in this respect.</p> <p>RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.</p> <p><b><u>Landscape Impact</u></b></p> <p>The site is located within the Wye Valley (AONB) National Landscape. A Landscape Visual Impact Appraisal (LVIA) (ES Landscape planning, August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that the proposals would result in a negligible magnitude of change within the localised setting of its rural context. MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development. It is considered that with appropriate design and layout, with retention of existing boundaries and well designed connections between existing settlement edge and appropriate density, development can be integrated effectively into the landscape as a settlement extension. These high level landscape design requirements are set out in Policy S8 and Policy HA13 criterion (a), which ensures key views of the Wye Valley National Landscape (AONB) setting are respected. Collectively, these policies, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity.</p> <p><b><u>RIGS</u></b></p> <p>The site is adjacent to the existing settlement of St Arvans where there is existing development above the existing geological resource. The impact on the RIGS will be considered further as part of the planning application stage. The development proposal will be assessed in consultation with NRW and the South East Wales Geodiversity group (SEWRIGS).</p> |
| <p><b>HA14 – Land at Churchfields, Devauden</b></p> | <p>Comments received in relation to proposed site allocation HA14 – Land at Churchfields, Devauden were predominantly objections from private individuals. These concerns were centred around the suitability of the location for a housing allocation with concerns that development here will add further pressure to local healthcare, social care and schools. Points were also raised in relation to highways, lack of public transport and active travel options in Devauden, impacts on the surrounding Wye Valley National Landscape (AONB), and impacts on ecology, including the</p>  |

location of nearby grassland SINCs to the proposed site. Concerns were also raised with regards to current Wastewater Treatment Work (WwTW) being at capacity.

#### **Site Selection**

The Land at Churchfields Devauden, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and 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. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).

The site has been allocated as part of the RLDP growth strategy to sustain existing communities by provision of affordable homes and strengthening our rural economy and will help to sustain the village for future generations and provide affordable housing to address housing need in the locality. The edge of settlement location provides the opportunity to promote accessibility and connectivity into Devauden's existing facilities, including the local church, community hall, playing fields and public open space. With regard to concerns of the lack of school capacity, as set out in the Infrastructure Delivery Plan (IDP) (Appendix 8 of the Plan), capacity in the local schools, both primary and secondary, will be reviewed at the time of the planning application to determine whether financial contributions are required.

#### **Highway Impact**

With regards to highway safety and concerns with regards to public transport and active travel provision in the locality, the site is in an area served by bus Public Transport. There is a northbound and southbound bus stop within 400m of the site. The design of the site must prioritise connections to public transport as set out in Policy S8 and Policy HA14 criterion (d). A financial contribution towards improved connections to public transport may be required which will be given further consideration at the planning application stage.

A Transport Statement (Lime Transport, August 2021) has been submitted to support the allocation. This concluded that given the small scale nature of the site, the impact of the development traffic on the local network would be negligible and that safe and suitable vehicle access can be provided via Churchfields, along with design improvements to Churchfields. Further analysis and consideration of the vehicular access/junction design, footways, street lighting, crossing provision and pedestrian connection to existing public transport bus stops will be required at the planning application stage. These policy requirements are set out in Policy HA14 criterion (d).

#### **Landscape Impact**

In terms of landscape concerns, a Landscape briefing note (EDP, July 2021) has been submitted which reviewed the landscape and visual characteristics. Overall, the landscape note concludes that although development would change the character of the site itself, it would not be significantly detrimental to the surrounding landscape character when set against the immediate context of the recent Churchfields development. Future development of the site should be informed by a robust Landscape and Visual Impact Assessment, which should inform the masterplanning and detail design of the scheme. MCC's Landscape Officer considers the site from a landscape and GI perspective



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|   | <p>to be suitable for residential development. It is considered that with appropriate design and layout, with retention of existing boundaries the proposed development can be integrated effectively into the landscape as an urban extension. These high level landscape design requirements are set out in Policy S8 and Policy HA14 criteria (a) and (b) which ensure key views of the Wye Valley National Landscape (AONB) are respected and the site is integrated sensitively into existing landscape features. Collectively, these policies, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity.</p> <p><b><u>Biodiversity Impact</u></b></p> <p>With regards to concerns raised in relation to loss of habitats, a Preliminary Ecological Appraisal (Soltys Brewster ecology, August, 2021) has been submitted which has appraised the site for its ecological value. Of note, the site contains important mature hedgerows which contain several important natural ecological habitats. The protection and preservation of these habitats is a key consideration in the development of the site. MCC's ecologists note that there are no 'in principle' constraints to the future development of the site subject to implementation of a sensitive masterplan design that incorporates appropriate inherent avoidance, mitigation and enhancement measures. It is considered that net benefit for biodiversity can be achieved at the site and this requirement is set out in Policy S8 - Site Allocation Placemaking Principles, as well as Policy S5 and Policy NR1- Nature Recovery of the Plan. Further details will be provided at the planning application stage. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.</p> <p><b><u>Wastewater Treatment Works</u></b></p> <p>With reference to the capacity of the sewerage system, Dŵr Cymru Welsh Water (DCWW) have been consulted throughout the Plan preparation process and advised that a scheme to increase the capacity at the Devauden WwTW is scheduled to be undertaken by January 2027, and that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of this scheme.</p> |
| <p><b>HA15 – Land East of Little Mill</b></p> | <p>Comments received in relation to proposed site allocation HA15 – Land East of Little Mill, Little Mill were predominantly objections from private individuals. Many felt that Little Mill is not a sustainable location due to the lack of amenities and public transport and also raised concerns around drainage/flooding and sewerage capacity. Concerns were also raised in relation to building on greenfield land and the subsequent loss of green open space and harm to wildlife. The need for more housing in this area was questioned particularly with regard to the nearby development planned at Mamhilad.</p> <p><b><u>Site Selection</u></b></p> <p>The RLDP spatial strategy is set out in Policy S2 and 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. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny,</p>   |



**Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).**

**Little Mill is identified as a Main Rural Settlement, with a good range of facilities, including a community hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the Plan period to help sustain the community. The proposed site is in an area served by public transport. The A472 at the eastern edge of the site is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow). Route 23 (Stagecoach) stops on the A4042 within walking distance of Little Mill offering services between Pontypool and Abergavenny, and Pontypool & New Inn railway station is easily accessible from the site with frequent trains to Cardiff and Newport as well as routes to the north including Abergavenny and Hereford. As required by Policy HA15, financial contributions towards improved public transport and bus frequency will be required and considered at the planning application stage. Further information is provided in the Infrastructure Delivery Plan.**

#### **Need for housing / Affordable Homes**

**A core RLDP objective is to deliver much needed affordable homes to help address inequality in both urban and rural communities. We have the highest average house prices in Wales which means a large proportion of people cannot afford to buy a home so either leave the County or have to live with their parents or in shared housing for longer. Notwithstanding the development proposed nearby, in Torfaen, Monmouthshire has over 2,000 households identified as being in need of affordable housing. The proposed site will provide 10 affordable homes for local people.**

#### **Flood Risk and Drainage Considerations**

**Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning does not identify any flood zones on the site. With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Policy HA15 requires a scheme for the management of overland flows from adjacent land to ensure the potential flood risk from the land above the site is accommodated within the layout of the site. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW noted that the Little Mill WwTW currently has limited capacity to accommodate foul flows, and a Developer Impact Assessment may need to be undertaken on the WwTW which will conclude any reinforcement works required.**

#### **Landscape and Ecology Considerations**

**The proposal to allocate land for development has been made with regard to green infrastructure, landscape and nature recovery considerations. The site search sequence (as outlined in PPW12) prioritises previously developed land (brownfield) and if none is**

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|  | <p>available (Monmouthshire has limited brownfield sites) then greenfield sites are to be considered. In response to ongoing dialogue with MCC, a reduced density and extent of development has evolved from the original submission, reducing the land area from 4.1ha to 1.68ha. Having regard to the Preliminary Ecological Appraisal (August 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures and note that the technical constraint on development imposed by the characteristics and alignment of the high-voltage overhead electricity line provides an opportunity to provide habitat diversification and consequent ecological enhancement through provision of an area of public open space in the southern section of the site; further details will be required at the planning application stage. Policies HA15 and S8 establish high-level policy requirements in this respect. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.</p> <p><b><u>Public Open Space</u></b></p> <p>The RLDP recognises the value and importance of placemaking and the provision of locally accessible open spaces for health and well-being and for recreation and, therefore, helps ensure the provision of public open space and recreation facilities are protected as well as requiring new development to make a contribution to the provision of additional/improved facilities. Accessible public open space will be a requirement of the development of the site, creating physical access to an area that currently only allows limited visual access. The amount of open space to be provided on site will be agreed at the planning application stage in accordance with the RLDP policy framework.</p> |
| <b>HA16 – Land North of Little Mill</b>                        | <p>The proposed allocation at Land north of Little Mill (Policy HA16) is a site that has been rolled forward from the adopted LDP.</p> <p>This site was granted planning permission on 17/09/2024 for the development of 15 homes (7 market, 8 affordable) under the reference DM/2020/01438.</p>  |
| <b>HA17 – Land adjacent to Llanellen Court Farm, Llanellen</b> | <p>Comments received in relation to proposed site allocation HA17 – Land Adjacent to Llanellen Court Farm, Llanellen were predominantly objections from private individuals. Concerns centred around drainage, flooding, sewerage capacity and pollution risks to the River Usk SAC. Many felt that Llanellen is not a sustainable location due to impacts on highways, lack of public transport and active travel options, nearby amenities, healthcare, and education facilities. Concerns were raised about visual and residential amenity impacts. Other points raised included impacts on protected trees, ecology, landscape sensitivity, and the site's proximity to a nearby SINC. Additionally, loss of agricultural land, and the perceived incompatibility of affordable housing with the area's character were noted.</p> <p><b><u>Site Selection</u></b></p> <p>Land Adjacent to Llanellen Court Farm, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and 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. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our</p>   |

most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).

Llanellen is identified as a Main Rural Settlement, with a good range of facilities, including a village hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the Plan period to help sustain the community. The proposed site is in an area served by public transport, including bus route 23 (Hereford-Abergavenny-Pontypool-Cwmbran-Newport) providing sustainable links to the services and facilities in these settlements. As required by Policy HA17, financial contributions towards improved public transport will be required and considered at the planning application stage. Further information is provided in the Infrastructure Delivery Plan.

#### Agricultural Land

It is recognised that a proportion of the proposed allocation is located on Best and Most Versatile (BMV) agricultural land. When considering the site search sequence set out in national planning policy, it is noted that most of the land surrounding Llanellen is of BMV status. In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of BMV agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

#### Need for Housing / Affordable Homes

A core RLDP objective is to deliver much needed affordable homes to help address inequality in both urban and rural communities. The proposed site will provide 13 affordable homes for local people.

#### Highways Impact

A Transport Statement (December 2023) has been submitted to support the allocation. MCC Highways consider that the existing access off the A4042 is capable of accommodating the proposed trip movements associated with the proposed development. Further analysis and consideration of the vehicular access/junction design, footways, street lighting, crossing provision, pedestrian connection to existing public transport bus stops and links with the Monmouthshire Brecon Canal will be required at the planning application stage. These policy requirements are set out in Policy HA17 criterion (b).

#### Landscape, Green Infrastructure (GI) and Ecology Impact

The proposal to allocate land for development has been made with regard to green infrastructure, landscape, nature recovery and ecology considerations. The site search sequence (as outlined in PPW12) prioritises previously developed land (brownfield) and if none is available (Monmouthshire has limited brownfield sites) then greenfield sites are to be considered. In response to ongoing dialogue with MCC, a reduced density and extent of development has evolved from the original submission, reducing the land area from 3.39ha to 1.56ha. MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development in response to the submitted Landscape Visual Statement (December 2023). Having regard to the Ecological Assessment (December 2023) submitted in support of the site, MCC Ecologists consider that the site is suitable for a residential allocation with appropriate mitigation and

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|  | <p>compensation measures. Policies HA17 and S8 establish policy requirements in this respect. These policies, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.</p> <p><b><u>Flood Risk / Drainage</u></b></p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Strategic Flood Consequence High Level Assessment concludes that there is no significant flood risk to the allocation with 0% of the site within Zones 2 &amp; 3 for Sea and Rivers and 2.57% of the site within Zones 2 &amp; 3 Surface Water. MCC's Drainage Officer has assessed the information and confirmed that surface water drainage can be managed at the site. With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p> <p><b><u>Wastewater Treatment Works (WwTW)</u></b></p> <p>The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW noted that the Llanellen WwTW has the biological capacity to accommodate the foul flows from this site. It has also been noted that NRW have completed the phosphorus permit review process and have confirmed that a backstop consent limit of 5mg/l is applicable from 15/02/2024 and this proposal would be accommodated within this limit.</p> |
| <p><b>HA18 – Land West of Redd Landes, Shirenewton</b></p> | <p>A significant number of representations were received concerning the proposed affordable housing-led site allocation at Land west of Redd Landes, Shirenewton (Policy HA18). Many commented on the size of the site and number of homes proposed, suggesting the site would be disproportionate and would overwhelm the village of Shirenewton.</p> <p>Concern was raised by some of the impact on protected species, habitats and the loss of agricultural land. The potential impact on the Shirenewton Conservation Area and landscape in general was noted.</p> <p>One of the key issues raised related to the lack of local amenities. It was noted that there are capacity issues at the local school and the public transport offer is limited. The impact of the site on the local road network was raised by many. The site's potential impact on the sewerage network in the local area was also of concern to many respondents.</p> <p><b><u>Site selection</u></b></p>  |

In accordance with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP are located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Shirenewton is a Tier 3 settlement and identified as a Main Rural Settlement. The RLDP proposes a small number of allocations in Main Rural Settlements to deliver much needed affordable homes and address rural equality and rural isolation in these areas. While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.

In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. The proposed site allocation at Land West of Redd Landes, Shirenewton is a sustainable edge of settlement site, located opposite the recreation ground, play area and recreation hall and offers an opportunity to link to wider public rights of way that connect to the primary school and other parts of the village.

#### Ecological Impact

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA18 includes criterion a) which notes that the existing boundary features will be enhanced with additional hedgerow and tree planting to boundaries to mitigate the development of the site and respond to its edge of settlement location. The RLDP includes a specific policy LC5 relating to dark skies and lighting that must be considered as part of a detailed planning application. Further ecological surveys will also be undertaken at the planning application stage. Any light and noise impact will be assessed as part of the planning application process.

#### Agricultural Land

It is recognised that the proposed allocation is located on Best and Most Versatile (BMV) agricultural land. When considering the site search sequence set out in national planning policy, it is noted that most of the land surrounding Shirenewton is of BMV status.

In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of BMV agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

#### Impact on heritage/landscape

The proposed site has been reduced in scale from the original area submitted. The reduced site area proposes a suitable extension to Shirenewton without detriment to the setting of the Conservation Area as this maintains a larger buffer area and preserves its setting. Glamorgan Gwent Archaeological Trust have noted a desk-based assessment and geophysical survey is required, prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

Strategic Policy S8 and Policy HA18 along with Policy S5 and supporting DM policies, including LC1- Landscape Character, will appropriately enable the authority to address concerns of impact on landscape character and visual amenity. Policy HA18 includes criterion a) which notes that the existing boundary features will be enhanced with additional hedgerow and tree planting to boundaries to minimise any potential landscape impact on the wider surroundings and respond to its edge of settlement location. Full consideration of design and landscaping in order to successfully integrate the proposals will be considered at the planning application stage.

#### Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, the site-specific infrastructure requirements of the allocated sites are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advised that there is currently capacity in secondary schools within the locality. With regard to primary education, there are capacity issues in some year groups in the catchment primary school, however, the site will not provide a sufficient increase in children to warrant a need to increase capacity at the school. The latest position with education will be reviewed at the planning application stage.

With reference to public transport, the site is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow), and consideration of the need for additional bus facilities to serve the site will be made at the planning application stage. The IDP sets out the requirement for financial contributions towards improved public transport and bus frequency.

#### Highways/Accessibility considerations

MCC Highways note the proposed site access off Earlswood Road is acceptable and the vehicular movements associated with the site will not have an adverse impact on the safety and capacity of the immediate highway network. Furthermore, Policy HA18 includes criterion e) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the site. This includes a key connection to a footpath link on the eastern part of the site to the road frontage allowing ease of access to the recreation hall and grounds, and a new footway link to the north of the site to connect into an existing public right of way, which will allow for a more direct public access route to the primary school.

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|   | <p><b><u>Flood Risk and Surface Water Run-Off considerations</u></b></p> <p>The Flood Map for Planning does not identify any flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p> <p><b><u>Dŵr Cymru Welsh Water</u></b></p> <p>Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and previously raised no concern with Shirenewton, noting there were no issues with either water supply or foul flows. At the Deposit Plan consultation stage, DCWW revised their comments to note a Hydraulic Modelling Assessment (HMA) may be required as it has since become apparent that there are some on-going issues along the sewer network. A HMA to determine that HA18 Land west of Redd Landes does not exacerbate the existing situation is therefore required, or as an alternative removal of surface water to offset foul flows could be utilised. This type of information would not, however, be required until the planning application stage. The site promoters are aware of the need to ensure early communication with DCWW on these matters.</p>   |
| <p><b>S9 – Land at Bradbury Farm, Crick</b></p> | <p>As noted above in relation to the Gypsy and Traveller policy topic area, objections were raised in relation to the Gypsy and Traveller allocation at Bradbury Farm, Crick for 7 pitches. Concerns primarily focussed on the suitability of the site due to issues such as noise and highways impact, access to services, proximity to the settlement community and the disproportionate number of Gypsy and Traveller sites located in the south of the County. Operational issues such as management, allocation of pitches and rental/council tax payments were also raised as concerns.</p> <p><b>Planning Policy Wales (PPW) requires local authorities to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need (4.2.36).</b> Site investigation surveys including air quality, transport, ecology, land contamination and noise surveys have been undertaken to inform the site identification process. The survey findings were considered at the Cabinet meeting of the 21st August 2024 which approved the inclusion of Land at Bradbury Farm, Crick as an allocation in the Deposit RLDP. Further survey work will be undertaken as necessary at the planning application stage. Further guidance is set out in Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Site. This notes at paragraph 38 that ‘in deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services.’ In this respect, the proposed allocation at Bradbury Farm and its proximity to residential areas is considered to be in accordance with national planning policy guidance and offers opportunities to masterplan the site as part of the wider proposals in the area.</p> <p>Welsh Government has a commitment to ensure a wide choice of accommodation is available and ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers, to have equal access to culturally appropriate accommodation as all</p> |



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|   | <p><b>other members of the community. With regard to existing Gypsy and Traveller sites in the County, each site is considered against the relevant policy framework and assessed on its own merits.</b></p> <p><b>Site management arrangements for the proposed allocation are still under consideration; however, pitch allocation arrangements will operate in a similar fashion to the housing register whereby families register their interest to be allocated a pitch or pitches.</b></p>   |
| <p><b>EA1a – Land at Nantgavenny Business Park, Abergavenny</b></p> | <p>Responses received in relation to employment allocation EA1a – Land at Nantgavenny Business Park, Abergavenny were predominantly from private individuals including a petition signed by 14 residents. Concerns raised related to the need for additional employment land and the impact on residential amenity. The loss of a greenfield site and impact on surface water run-off was also of concern. Highways concerns focussed on the ability of Nantgavenny Lane to cope with additional traffic. The ecological impact of the proposed allocation on the site itself and River Gavenny SINC corridor has also been raised.</p> <p><b><u>Need for the Employment Allocation</u></b></p> <p><b>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements for the Plan period up to 2033. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (ELR) (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations.</b></p> <p><b>The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0266 – Land at Nantgavenny Business Park, would make a logical extension to the existing industrial estate, with the mix of uses similar to the existing. It noted that demand is likely to be from small to medium enterprises (SMEs), the provision of which would be consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS). The EESS, which sets out the Council’s direction of travel and action plan for delivering job growth, recognises the importance of SMEs to Monmouthshire’s economy and their contribution to providing a high degree of resilience to the local economy. Furthermore, the proposed allocation provides much needed employment provision in Abergavenny, which is recognised as being a primary settlement in the settlement hierarchy.</b></p> <p><b>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. However, Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework.</b></p> |



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|  | <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised above, whilst also providing additional homes and opportunities for economic growth.</p> <p><b><u>Impact on Residential Amenity</u></b></p> <p>Consistent with the adjoining employment site, the RLDP allocates land at Nantgavenny Business Park for B1 uses. The Town and Country Planning (Use Classes) Order 1987 (as amended) categorises B1 uses as offices (other than those that fall within A2), research and development of products and processes and light industry appropriate in a residential area. Furthermore, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.</p> <p><b><u>Ecological Impacts</u></b></p> <p>There are no ecological designations on site, however, its proximity to the River Gavenny SINC is noted. MCC Ecology consider the site to be suitable for development with the incorporation of appropriate mitigation measures, such as the inclusion of a buffer to with the adjoining SINC and retention of priority hedgerows. Further layout details will be assessed as part of a planning application. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.</p> <p><b><u>Highways Impact</u></b></p> <p>Access to the site is proposed through the existing private industrial estate road which can be extended to accommodate the proposed development. Comments relating to the constraints associated with Nantgavenny Lane, are noted, and an updated Transport Assessment will be required as part of the planning application process and will be required to consider the capacity on Nantgavenny Lane and the Nantgavenny Lane / Hereford Road junction.</p> <p><b><u>Surface Water Run-Off</u></b></p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p> |
| <p><b>EA1b – Poultry Units, Rockfield Road, Monmouth</b></p> | <p>The proposed B1 employment allocation at the Poultry Units, Rockfield Road, Monmouth (EA1b) did not receive any objections.</p> <p>It was recognised that the employment designations do not allow for uses outside of the B use classes, however, it was suggested that the site could also support an element of D1 use to make it a more flexible allocation.</p>  |

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|  | <p>An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Poultry Units, Rockfield Road, Monmouth (Policy EA1b) for a B1 use. The proposed allocation provides much needed employment provision in Monmouth, which is recognised as being a primary settlement in the settlement hierarchy.</p> <p>The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy.</p> <p>While it is recognised that D1 uses can be employment generating the purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, the Council would not support a mixed B1/D1 use on this site.</p>   |
| <p><b>EA1c – Land North of Wonastow Road, Monmouth</b></p> | <p>There were limited responses on the proposed employment allocation Land North of Wonastow Road, Monmouth (EA1c), for B1.B2 and B8 uses. Overall, there was general support for the allocation.</p> <p>Some comments proposed alternative uses on the site in addition to employment, including a care home and housing.</p> <p>An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Land north of Wonastow Road, Monmouth (Policy EA1c) for B1, B2 and B8 uses. The proposed allocation provides much needed employment provision in Monmouth, which is recognised as being a primary settlement in the settlement hierarchy.</p> <p>The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0274 – Land north of Wonastow Road, Monmouth, is attractive for employment and would likely host several industrial units smaller than the neighbouring Siltbuster and Tri-Wall site. The provision of such industrial units would be consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy.</p> <p>It is recognised that a care home use can be employment generating, however, the Council would not support a care home use on this site. The purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, this site will continue to be allocated for an employment use only.</p> |

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| <b>EA1d/W3c – Newhouse Industrial Estate, Chepstow</b>    | <p>The proposed allocation at Newhouse Industrial Estate, Chepstow for 2.5ha of employment land received few responses, none of which were objections to the employment allocation. There was general support for employment uses in this location and a general comment that lighting and pollution impacts will need to be considered in relation to Mathern.</p> <p><b>In response to residential amenity concerns upon Mathen Village, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution, and will be considered at the planning application stage.</b></p>  |
| <b>EA1e/W3f – Land adjoining Oak Grove Farm, Caldicot</b> | <p>A limited number of responses were received in relation Land adjoining Oak Grove Farm, Caldicot (EA1e/W3f). Limited comments were raised and related to the type of development proposed and whether the site has mains drainage, noting that the site is located within the Source Protection Zone. It was suggested the site was too small and would be better located closer to existing employment sites.</p> <p><b>An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Land adjoining Oak Grove Farm, Caldicot (Policy EA1e) for B1, B2 and B8 uses. The proposed allocation provides much needed employment provision in Caldicot, which is recognised as being a primary settlement in the settlement hierarchy.</b></p> <p><b>Any uses on the site would be subject to a planning application and considered on a case-by-case basis subject to detailed planning considerations and, must be in accordance with the Plan’s policy framework as a whole. The site has also been identified as a potential waste management site under Policy W3 (W3f). While the site has potential for such a use this would be subject to detailed planning considerations.</b></p> <p><b>Regarding the site’s location in a Source Protection Zone (SPZ). In their response to the Deposit Plan Natural Resources Wales (NRW) note that in areas of non-mains drainage inside this SPZ, all sewage effluent discharges to ground must have an environmental permit and proposals will be considered based on a risk assessment and the appropriateness of the discharge with respect to the local environmental setting. Any development proposals within the SPZ must be able to demonstrate that the proposal complies with NRW groundwater protection policy and that no contamination of the water supply will result from the development proposal. This will be considered further through the planning application process.</b></p> <p><b>The site relates to 6ha which is not considered to be too small to be a standalone employment site. The site benefits from good access direct onto the A48 along with access to existing public transport.</b></p> |
| <b>EA1f/W3d – Quay Point, Magor</b>                       | <p>The allocation Quay Point Magor for 14ha of employment land received several representations, whereby there were concerns to the site’s allocation in terms of environmental impact upon the adjacent Site of Special Scientific Interest (SSSI) Gwent levels and Historic Gwent Levels landscape character and Scheduled Ancient Monument (SAM) Wilcrick Hill , alongside concerns in relation to the impact of the allocation on the setting of Llandeenny and nearby residential properties amenity in terms of visual, noise and light pollution.</p>  |

**Principle of the Site Allocation**

In response to these concerns raised, the site has previously been identified as an employment site within Monmouthshire, allocation SAE1b in the current adopted LDP. Although it is recognised that the site is greenfield and located in close proximity to the SSSI designation, it is considered that on planning balance the employment allocation is of strategic importance to ensure the continued support for employment growth and economic benefit in the area.

An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required for the Plan period to 2033 and the sites to allocate. The ELR confirmed that land at Quay Point, Magor would be suitable for employment uses, reflecting its strategic location in the County, positioned along the M4 corridor, and given that Magor Brewery is one of the County's main employers.

**SSSI and Gwent Levels Historic Landscape Considerations**

In terms of the impact upon the SSSI and Gwent Levels Historic landscape, a Preliminary Ecological Appraisal has been submitted which has appraised the site for its ecological value. This has been reviewed by MCC ecologists, who consider the site is suitable for allocation with appropriate mitigation and compensation, which includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately size buffer area at southern section of site to limit impacts on SSSI. Full details will be required at the planning application stage. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Cadw have provided comments as part of the Candidate Site Assessment Process and do not object to the allocation's impact on the SAM at Wilcrick Hill due to the distance and intervening buildings between the site location and SAM.

The RLDP provides the planning policy framework to ensure the impact on the environment and landscape is fully considered when assessing proposed developments at planning application stage, with reference to Policy S5 – Green Infrastructure, Landscape Nature Recovery, LC1 Landscape Character, NR1 Nature Recovery and Geodiversity and NR3 Protection of Water Sources and the Water Environment. Separate requirements and tools under other legislation, if required, such as The Environment Act (Wales) 2016 Section 6 Duty and PPW12 will also help to ensure development has an acceptable impact upon environmental considerations. There will also be further full consultation at the planning application stage with other regulatory environmental bodies, including NRW and Cadw.

**Amenity Impact**

With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regard to amenity issues including air pollution, light pollution and noise pollution, and will be considered at the planning application stage.

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| <b>EA1g – Rockfield Farm, Undy</b>       | <p>The proposed allocation at Rockfield Farm, Undy for 3.2ha of employment land received just one response from statutory consultee Dŵr Cymru Welsh Water (DCWW), confirming the site is in the catchment of the Nash Wastewater Treatment Works (WwTW). This site forms part of the mixed used strategic site allocated (SAH5) of the current adopted LDP, which was granted outline planning permission 20.03.20218 (DC/2016/00883). There is a current planning application for provision of 5,575m2 of B1 employment use on the land which is pending a decision.</p>  |
| <b>EA1h/W3e – Gwent Euro Park, Magor</b> | <p>A limited number of representations were received in relation to employment allocation Gwent Euro Park Magor for 7ha, whereby there were concerns to the site's allocation in terms of environmental impact upon its location within the Site of Special Scientific Interest (SSSI), Gwent levels and Historic Gwent Levels landscape character, alongside concerns in relation to the impact of the allocation on the setting of Llandeenny and nearby residential properties amenity in terms of visual, noise and light pollution.</p> <p><b>The site has previously been identified as an employment site within Monmouthshire, allocation SAE1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, this site has extant planning permission meaning that development could lawfully commence on the site without the need to apply for future planning permission. This is considered to be an exceptional circumstance in this context. Moreover, immediately adjacent land, which lies within Newport City Council's jurisdiction, and which forms part of the extant planning permission, is currently being developed for employment use.</b></p> <p><b>Given the site's strategic location and the extant fallback permission, together with evidence to demonstrate that the site can be delivered (i.e. submission of a current planning application DM/2025/00852), it is considered appropriate to reallocate the site in the RLDP. The site will make a significant contribution to the RLDPs employment land provision, reflected in Policy S1 and Policy S10.</b></p> <p><b>As part of the current planning application DM/2025/00852 relating to the adopted LDP allocation, the applicant has provided up-to date survey work including updated FCA which will need to meet the current TAN15 National flooding policy, drainage plans, ecological and landscape assessments, environmental health and transport assessments, which will be assessed as part of this process.</b></p> |
| <b>EA1i/W3a – Raglan Enterprise Park</b> | <p>A limited number of representations were received in relation to employment allocation EA1i – Raglan Enterprise Park. Concern was raised that the site allocation is outside of the settlement boundary and would result in the loss of high-quality agricultural land. Comments relating to the proposed renewable energy generation allocation are discussed in relation to Policy CC2 – Renewable Energy Allocation.</p> <p><b>Both the Protected Employment site and proposed Employment Allocation at Raglan Enterprise Park are located outside of the settlement boundary. This is consistent with the approach taken in relation to Raglan Enterprise Park employment allocation in the Adopted Local Development Plan and reflects the strong functional link the employment site has with Raglan but also recognising the distance between the industrial units and urban form. The proposed allocation Raglan Enterprise Park is considered to be a logical extension to the existing employment provision at the site. Furthermore, the Employment Land Review (Nov 2022) considers the appropriateness of the candidate sites put forward for allocation for employment use and concludes that land promoted under Candidate Site CS0069 – Land at Raglan Enterprise Park, could provide small-scale units for local needs within the northern part of the County. This would be consistent with the objectives of the Council's Economy, Employment and Skills Strategy (EESS), which recognises the importance of SMEs to Monmouthshire's economy and their contribution to providing a high degree of resilience to the local economy.</b></p>  |

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|  | <p>A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.</p>  |
| <p><b>EA1j/W3b – Land West of Raglan</b></p> | <p>Comments received in relation to employment allocation EA1j – Land West of Raglan, question the need for the allocation. It was noted that it is unjustified and would result in the loss of high-quality agricultural land. Concerns were raised that it would result in a visually prominent site, resulting in an unacceptable impact on the landscape and Raglan’s historic environment, including Raglan Castle and Raglan Conservation Area. Other concerns related to the highways impact of the proposal and surface water run-off implications.</p> <p><b><u>Need for the Allocation/Loss of High-Quality Agricultural Land</u></b></p> <p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements for the Plan period up to 2033. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (ELR) (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations.</p> <p>The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0278 – Land West of Raglan, would be suitable for employment uses, reflecting its strategic location in the County, positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth/Hereford and south towards Newport/Cardiff and Bristol, hence the promotion of such uses via the candidate site process. Having regard to the findings of the ELR and the site selection process which has had full regard to development constraints, the proposed site allocation is considered to be appropriate and will contribute to meeting Monmouthshire’s economic growth objectives.</p> <p>The allocation is also consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS), which sets out the Council’s direction of travel and action plan for delivering job growth.</p> <p>A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for</p> |

allocations involving BMV land and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.

#### Landscape Impact

The allocation proposes a reduced site area to that submitted as part of the candidate site process reflecting the ongoing dialogue between the Council and the site promoters. The location of the reduced site area integrates the proposed employment allocation more sensitively into the landscape with an existing line of mature trees on the eastern verge to the proposed allocation affording an existing element of visual screening. However, it is noted that required visibility splays will have an impact on this. The integration of an appropriate buffer and green infrastructure provision will be a key requirement of the site's development as required by Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recover. Similarly, the use of materials and colours to reflect the setting will be required in accordance with policy PM1 – Creating Well-designed Places. Further placemaking principles will be determined at the planning application stage.

#### Impact on Historic Environment

MCC's Heritage Officer has advised that key vistas and sightlines will be maintained allowing Raglan Castle to remain as a key landmark. This will maintain the integrity of the Conservation Area and the setting of the Castle. Through the integration of placemaking principles and enhanced green infrastructure and other policy requirements set out in the RLDP, the proposed allocation is not considered to detrimentally harm the setting of the Castle or wider views.

#### Ecological Impact

There are no ecological designations on site, and MCC Ecology consider the site to be suitable for development with the incorporation of appropriate mitigation measures, such as the inclusion of a buffer between development and the watercourse. Further layout details will be assessed as part of a planning application. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

#### Surface Water Run-Off

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

#### Highways Impact

Having regard to Transport Statement prepared in support of the proposed site allocation, MCC Highways consider both the proposed site access onto Usk Road and the traffic generation and distribution to be acceptable in principle. Further detailed analysis will be required as part of a planning application submission.



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| <b>EA1k – Land to the East of Abergavenny</b>                   | <p>As discussed in relation to Strategic Site Allocation HA1 – Land to the East of Abergavenny, comments relating to the employment element of the site raised concerns in relation to the level of employment provision, with suggestions made that this should be increased from 1ha of B1 use industrial land.</p> <p><b>The employment provision made within the strategic allocation under policies HA1 and EA1k – Land to the East of Abergavenny, is an integral element of the proposed mixed-use element of the allocation located at the western end of the site, opposite the train station, and as such has potential to serve both the development site and the wider Abergavenny area. The scale of provision reflects a balance between the creation of a sustainable community through the incorporation of a mixture of uses and an acknowledgement of the level of B1 Use Class provision that is needed to contribute to the overall employment land requirement over the Plan period.</b></p> <p><b>The Town and Country Planning (Use Classes) Order 1987 (as amended) classifies B1 Business Use Class as being offices, research and development of products and processes, light industry appropriate in a residential area. The employment allocations have been informed by the Employment Land Review (Nov 2022), which recognises the important contribution B1 uses make to the local economy but concludes that B2 (general industrial) and B8 (storage and distribution) uses make up the majority of the employment requirement, which would not be appropriate in the context of the proposed residential-led, mixed-use allocation. In this respect, additional land for B1 use classes is not considered to be required as part of this site. It should be noted, however, that the proposal also incorporates a neighbourhood centre which could also generate employment opportunities in non-B Use Class industries.</b></p> |
| <b>EA1l – Land at Former MOD Site, Caerwent</b>                 | <p>A limited number of comments were received on this allocation, as most were directed to the mixed-use housing allocation (Policy HA9). It was raised by the site promoter, however, that the allocation should not just be allocated for a restricted B1 employment use, but for a wider/flexible designation which allows a mix of B1 and C2 (care-home) uses.</p> <p><b>In response to this objection, it is considered that the proposed allocation provides much needed employment provision in Severnside. The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy. While it is recognised that a care home use can be employment generating, the purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, the Council would not support a care home use on this site.</b></p>  |
| <b>EA1m – Land to the East of Caldicot/North of Portskewett</b> | <p>A limited number of comments were received in relation to EA1m specifically, EA1m forms part of the Land to the East of Caldicot/North of Portskewett mixed-use allocation (Policy HA2). It was questioned whether there was demand for employment land from businesses in the area. It was also suggested that flexibility should be applied to any employment including in relation to the location, the location shown in the indicative masterplan was objected to stating this was not appropriate and should therefore be amended.</p> <p><b>An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes HA2/EA1m for 1ha of B1 uses.</b></p>   |



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|   | <p>Use Class B1 relates to business use and includes office use (other than those within Class A2), research and development and light industry (where any process can be carried out in a residential area without causing detriment to the amenity of the area). Any uses on the site would, nevertheless, be subject to a planning application and considered on a case-by-case basis subject to detailed planning considerations and, must be in accordance with the Plan's policy framework as a whole.</p> <p>Regarding the indicative masterplan, while it is recognised that further dialogue regarding the masterplanning of the site has taken place with the site promoters since the Deposit RLDP consultation, the masterplan set out in the Plan is indicative only and was considered to be a helpful aide to the consultation process by providing a visual interpretation of the site's broad parameters, policy requirements and proposed uses. Policy HA2 clearly states that a masterplan will be agreed with the Local Planning Authority prior to the determination of any planning application. The masterplan will be updated through the planning application process and will, therefore, be subject to further changes/iterations. It is not, therefore, considered necessary to amend the indicative masterplan.</p> <p>A summary of the comments made in relation to Land to the East of Caldicot/North of Portskewett (Policy HA2) is provided in the relevant section of the Report.</p> |
| <b>W3g – Existing Waste Facility – Five Lanes, Caerwent</b> | No comments were received in relation to this allocation.   |
| <b>W3h – Existing Llanfoist Civic and Transfer Station</b>  | <p>National Grid Energy Distribution (NGED) advised that the existing Llanfoist Civic and Transfer Station is crossed or in close proximity to a National Grid asset.</p> <p>The waste allocation identified under allocation W3h – Existing Llanfoist Civic Centre and Transfer Station, is a functioning waste facility in the County. The position of the power line and provided guidance will be considered should any planning applications be submitted for additional facilities at the site.</p>   |

## Appendix 1: RLDP Key Stages in Chronological Order

| RLDP Stage                                   | Timescales / Details   |
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| Delivery Agreement                           | 19 <sup>th</sup> March 2018- Approved by Council for consultation for a four-week period from 21 <sup>st</sup> March to 18 <sup>th</sup> April 2018. Report of Consultation reported to Council on 10 <sup>th</sup> May 2018. The DA was subsequently agreed with Welsh Government on 14 <sup>th</sup> May 2018.   |
| Initial Call for Candidate Sites             | An Initial call for Candidate Sites took place for a sixteen-week period from 30 <sup>th</sup> July to 19 <sup>th</sup> November 2018.   |
| Sustainability Appraisal Scoping Report 2019 | Endorsed for targeted consultation at Individual Cabinet Member meeting of 16 <sup>th</sup> January 2019. The draft SA Scoping Report was issued for a five-week period of consultation with statutory SEA consultation bodies (i.e. Natural Resources Wales (NRW) and Cadw) from 26 <sup>th</sup> October to 30 <sup>th</sup> November 2018. The post consultation report was agreed on 16 <sup>th</sup> January 2019 by Individual Cabinet Member.             |
| Habitats Regulations Screening Report 2019   | Endorsed for targeted consultation at Individual Cabinet Member meeting of 16 <sup>th</sup> January 2019. The draft HRA Initial Screening Report were issued for a five-week period of consultation with statutory SEA consultation bodies (i.e. Natural Resources Wales (NRW) and Cadw) from 26 <sup>th</sup> October to 30 <sup>th</sup> November 2018. The post consultation report was agreed on 16 <sup>th</sup> January 2019 by Individual Cabinet Member. |
| Issues and Vision Report 2019                | Non-Statutory consultation with Members and through Area Committee and Cluster meetings during January 2019, and Economy & Development Select Committee on 14 <sup>th</sup> February 2019. A summary of the feedback received, together with the Council's draft response was reported to Cabinet on 5 <sup>th</sup> June 2019. The Issues, Vision and Objectives Paper was endorsed by Cabinet on 5 <sup>th</sup> June 2019.                                    |
| Issues, Vision and Objectives (July 2019)    | Updated to reflect the Council's declaration of a climate emergency in May 2019 and set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. Reported and endorsed by Cabinet on 3 <sup>rd</sup> July 2019.   |

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| Growth and Spatial Options 2019 (July 2019)  | Endorsed for non-statutory consultation for a four-week period from 8 <sup>th</sup> July 2019 to 5 <sup>th</sup> August 2019 by Cabinet on 3 <sup>rd</sup> July 2019.  |
| Delivery Agreement First Revision (March 2020)   | The Revised Delivery Agreement was approved by Council on 5 <sup>th</sup> March 2020, agreed by Welsh Government on 6 <sup>th</sup> March 2020 and published on the 9 <sup>th</sup> March 2020. The DA was amended to reflect the delays incurred up to the Preferred Strategy stage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work. |
| Issues, Vision and Objectives (March 2020)   | Amendment of Vision to include the spatial element associated with the 2020 Preferred Strategy.  |
| Preferred Strategy (2020) with Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment | The Preferred Strategy, Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment were endorsed for statutory public consultation for a six-week period between 9 <sup>th</sup> March 2020 and 22 <sup>nd</sup> April 2020 by Council on 6 <sup>th</sup> March 2020.   |
| Second Call for Candidate Sites  | On 6 <sup>th</sup> March 2020, Council agreed a Second Call for Candidate Sites to take place over a twelve-week period from 9 <sup>th</sup> March – 3 <sup>rd</sup> June 2020.  |
| Notice of amendment to Preferred Strategy and Second Call for Candidate Sites                                  | On 18 <sup>th</sup> March 2020, notification was given of the postponement of the RLDP community engagement events and attendance at Community Council Clusters and Area Committees due to Covid-19. Consultees were advised that the consultation period and opportunity to submit candidate sites remained open, but the deadline for both would be extended accordingly.  |
| Notice of cessation of the RLDP Preferred Strategy Consultation and  | Following advice from the Minister for Housing and Local Government, the decision was made to cease the RLDP Preferred Strategy consultation and Second Call for Candidate Sites on 20 <sup>th</sup> July 2020.  |

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| Second Call for Candidate Sites  |  |
| Delivery Agreement Second Revision (October 2020)  | Updated to reflect unavoidable delays relating to the Covid-19 pandemic, the review of the Issues, Vision, Objectives and Evidence Base, and publication of 2018-based population projections. The Revised DA was reported to and agreed by Council on 22 <sup>nd</sup> October 2020. The CIS was also reviewed and adjusted in line with the Coronavirus Regulations (2020) and Ministerial advice to reflect social distancing and other measures. The revised DA was agreed with the Welsh Government on the 30 <sup>th</sup> October 2020.   |
| Issues, Vision and Objectives (October 2020)   | A review was undertaken in June 2020 and again in July 2020 following the publication of a letter from the Minister of Housing and Local Government (7th July 2020) to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Cabinet on 17 <sup>th</sup> June 2020 and Council on 22 <sup>nd</sup> October 2020. |
| Growth and Spatial Options Paper December 2020   | The revisited Growth and Spatial Options Paper was endorsed for non-statutory public consultation at the Cabinet meeting on 16th December 2020. The consultation took place over a 4-week period between January and February 2021.  |
| Preferred Strategy (June 2021) with Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment | The Council endorsed the Preferred Strategy and associated documents for statutory consultation for an eight-week period from 5 <sup>th</sup> July – 31 <sup>st</sup> August 2021, at its meeting of 24 <sup>th</sup> June 2021.   |
| Second Call for Candidate Sites (June 2021)  | Council approved a Second Call for Candidate sites on 24 <sup>th</sup> June 2021. This took place alongside the Preferred Strategy   |

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|   | consultation for an eight-week period from 5 <sup>th</sup> July to 31 <sup>st</sup> August 2021.   |
| RLDP Update and Candidate Site Register Publication Notification (February 2022)                        | On the 10 <sup>th</sup> February 2022, an informative email/letter was sent to stakeholders on the RLDP consultation database, notifying of the publication of the Candidate Site Register on the Council's website and to provide an update on the RLDP. The email/letter informed stakeholders that the Council was considering the implications of the Welsh Government Planning Division's proposed prescribed maximum growth level on the RLDP's objectives. It advised that a future report to Council in late summer 2022 would present options for progressing the RLDP and would seek a Council decision on how to proceed. |
| RLDP Options Report (September 2022)  | Report seeking endorsement of the proposed way of progressing the RLDP agreed by Council on 27 <sup>th</sup> September 2022. The RLDP Options Report invited Council to agree a proposed way forward, with a recommendation to Council that the best option to proceed is to progress with an amended growth and spatial strategy that responds to the challenges that had arisen to this point.   |
| Delivery Agreement Third Revision (December 2022)   | Updated to reflect revised timescales following the decision to embark on a new Preferred Strategy following an objection from Welsh Government to the July 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk Catchment areas.<br><br>The Revised DA was endorsed by Council on 1 <sup>st</sup> December 2022 and agreed with Welsh Government on the 2 <sup>nd</sup> December 2022.  |
| Issues, Vision and Objectives (December 2022)   | Minor updates made in December 2022, as part of the Preferred Strategy consultation that took place in December 2022.  |
| Preferred Strategy (December 2022) with Initial Integrated Sustainability Appraisal Report and Habitats | The revised Preferred Strategy and associated documents were endorsed by Council on 1 <sup>st</sup> December 2022 for statutory consultation for an eight-week period from 5 <sup>th</sup> December 2022 – 30 <sup>th</sup> January 2023.  |

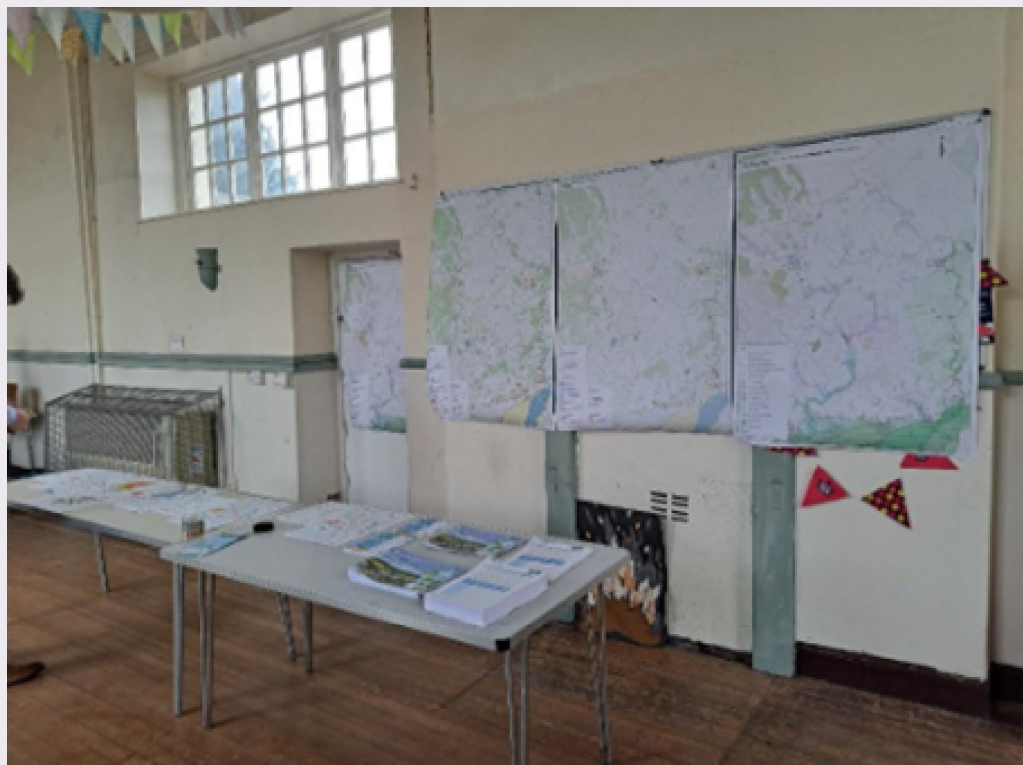
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| Regulations Assessment  |  |
| Candidate Site Register (December 2022)                                   | The Candidate Site Register was endorsed by Council on 1 <sup>st</sup> December 2022 for statutory consultation for an eight-week period from 5 <sup>th</sup> December 2022 – 30 <sup>th</sup> January 2023.   |
| Phosphate Briefing Note July 2023   | <p>July 2023 – Phosphates Briefing Update sent out to all stakeholders on the RLDP consultation database providing an update on the water quality issues affecting the River Wye and River Usk. The email advised that following the removal of the constraint on the Monmouth WWTW, it was proposed that the Deposit Plan would identify a new strategic site allocation for approximately 250-300 homes and include three 'roll-over' sites in the settlement of Monmouth. Updates to the Candidate Sites Register to reconsider sites previously filtered out due to the phosphates issue and the addition of a new candidate site submitted at the 2022 Preferred Strategy stage were also noted.</p> <p>A Scrutiny workshop open to all Members was also held on 12th July 2023 to discuss the briefing update.</p> |
| Preferred Strategy Post Consultation Update to Council (October 2023)     | In October 2023, in accordance with the Delivery Agreement a non-statutory report was taken to Council to seek endorsement of a small number of key post-consultation updates to the Preferred Strategy as a basis for the preparation of the Deposit Plan. Council agreed these changes which formed the basis of the preparation of the Deposit Plan.  |
| Delivery Agreement Fourth Revision (October 2024)                         | Updated to reflect impacts on the publication of the Deposit RLDP due to the timing of a UK General Election. The Revised DA was agreed by Council on 24 <sup>th</sup> October 2024 and agreed with the Welsh Government on 25 <sup>th</sup> October 2024.   |
| Issues, Vision and Objectives (September 2024)                            | Minor updates undertaken as part of the preparation of the Deposit Plan.   |
| Deposit Plan with Integrated Sustainability Appraisal Report and Habitats | Council endorsed the Deposit Plan and associated documents on 24 <sup>th</sup> October 2024, for statutory public consultation for a six-week period between 4th November and 16 <sup>th</sup> December 2024.  |

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| Regulations<br>Assessment<br>(October 2024) |  |
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## Appendix 2: Selection 'Drop-in' Session Photos

### Raglan Drop-in Event Old Church School Community Centre – 12<sup>th</sup> November 2024





## Abergavenny Drop-in Event Market Hall – 14<sup>th</sup> November 2024



## Chepstow Drop-in Event Palmer Centre – 21<sup>st</sup> November 2024



## Monmouth Drop-in Event Shire Hall – 25<sup>th</sup> November 2024





## Appendix 3: School Consultation Feedback

During the school engagement sessions at Caldicot and Chepstow Comprehensive Schools, a presentation was given by the Council's Head of Placemaking and Planning Policy Officers. This covered a range of points, including the geography of Monmouthshire and the scope and purpose of the RLDP.

The pupils were asked what challenges and issues Monmouthshire has and how they think the RLDP can address them. Pupils were also asked whether they would like to live in Monmouthshire when they are adults.

### Key Issues Feedback

Pupils in the sessions thought some of key issues Monmouthshire faced were:

- Traffic
- Empty shops
- Pollution
- Unemployment
- Homelessness

Some pupils thought new houses were needed for people without homes and to meet the need of Monmouthshire's older population, but traffic and infrastructure problems needed to be addressed before new houses were built. The number of empty shops was also raised as a key issue by the pupils.

There was a mixed response on whether pupils wanted to live within Monmouthshire in the future, with some wanting to stay as it's their home/where they are from, with others wanting to live somewhere else as they considered that 'there is not much' for young people to do in Monmouthshire. Some would like to return to Monmouthshire to settle later in life (after moving to cities, such as London and Bristol) for a number of reasons, including good schools and to be near to family.

### Site Specific Feedback

The presentations were tailored to the different local areas, whereby within Chepstow Comprehensive School, the discussion focussed on a masterplan design exercise relating to the proposed site allocation at Land at Mounton Road, Chepstow, and within Caldicot Comprehensive School, the discussion and masterplan design exercise focussed on the proposed site allocation at Land to the East of Caldicot/North of Portskewett.

**HA3 – Land at Mounon Road, Chepstow:** Chepstow pupils thought that Land at Mounon Road was not the right area to develop, as it would make the area very busy, increasing traffic congestion in the locality and that Chepstow is becoming a suburb of Bristol. Pupils also noted that the proposed allocation would affect the view of Chepstow and that the natural landscape would be spoilt. They did, however, recognise the need for affordable housing and suggested that the proposed care home would be a good idea for Monmouthshire's ageing population and that a hotel would be good addition because of the Racecourse nearby.

**HA2 – Land to the East of Caldicot/North of Portskewett:** In the Caldicot session, which focussed on the proposed site allocation Land to the East of Caldicot/North of Portskewett, pupils thought that affordable homes was a good idea. The inclusion of a new primary school was also welcomed as they noted that building more houses would mean more schools are required. However, some thought that there were too many houses proposed, which could lead to overcrowding and destroy the open space between Caldicot and Portskewett. Concerns were also raised in relation to the loss of the land which they considered to be

aesthetically pleasing. Views were expressed that the construction of homes would affect this negatively and be a threat to nature and wildlife and also cause flooding. Others considered that the proposed development would impact on local service such as doctors, making it difficult to book appointments and new housing would impact on the roads and cause traffic congestion. It was also thought that people working in Bristol would move to the local area.

## **Appendix 4: Business Engagement Event Feedback**

### **Deposit RLDP Consultation- Business Engagement Event 06.12.2024**

A range of businesses representatives from across Monmouthshire were invited to the Deposit RLDP engagement event. A total of 7 business representatives attended the event, along with the Cabinet Member for Planning and Economic Development and Deputy Leader, an official from Welsh Government's Economic Development Division and representatives from the Council's Planning, Estates and Economy, Employment and Skills Teams.

A presentation was given by the Council's Head of Placemaking, focusing on the Deposit RLDP's proposed site allocations and economy/employment policy framework. A range of issues were raised and discussed, including in relation to the proposed strategic site allocations with some concerns noted regarding infrastructure capacity in the main towns, and proposed employment allocations, with some noting the current lack of suitable employment land in the County and the need for employment land to expand existing businesses. It was noted that at this stage the Deposit RLDP sets out the employment land available for development and the next stage is to work with businesses to develop the sites and make them work for Monmouthshire's businesses. The links with the Council's Economy, Employment and Skills Strategy were noted.

In addition, from a skills/employment/apprenticeship perspective, access to colleges and further education and the need for a skills centre was raised by a number of attendees. Officers advised that there is an ambition to provide a skills centre in Monmouthshire and opportunities are being explored to engage with neighbouring local authorities on this matter.

## Appendix 5: Consultation Poster

**monmouthshire**  
**sir fynwy**

**Have your say**

Monmouthshire County Council is consulting on its Deposit Replacement Local Development Plan (RLDP), which will cover the period 2018-2033.

This sets out land for homes and jobs and protection for our environment.

Public consultation and engagement will run from **4th Nov - 16th Dec 2024**.

See dates of drop-in sessions.  
Or scan the QR code below to find out more.

**Drop-in Engagement events**

|  |   |
|--|---|
| <b>Raglan Old Church School Community Centre</b> , Chepstow Road, Raglan<br><b>Tuesday 12th Nov</b><br>2pm-7pm | <b>Magor Baptist Chapel</b> , The Square, Magor<br><b>Wednesday 27th Nov</b><br>2pm-7pm             |
| <b>Abergavenny Market Hall</b> , Cross Street, Abergavenny<br><b>Thursday 14th Nov</b><br>2pm-7pm              | <b>Portskewett Recreational Hall</b> , Manor Way, Portskewett<br><b>Friday 29th Nov</b><br>2pm-7pm  |
| <b>Usk Community Hub</b> , Maryport Street, Usk<br><b>Monday 18th Nov</b><br>2pm-7pm                           | <b>Goytre Village Hall</b> , Newton Road, Penperlleni<br><b>Monday 2nd Dec</b><br>2pm-7pm           |
| <b>Palmer Centre</b> , High Street, Chepstow<br><b>Thursday 21st Nov</b><br>2pm-7pm                            | <b>Caldicot Town Council Building</b> , Sandy Lane, Caldicot<br><b>Wednesday 4th Dec</b><br>2pm-7pm |
| <b>Shire Hall</b> , Agincourt Square, Monmouth<br><b>Monday 25th Nov</b><br>2pm-7pm                            |   |

**Online Engagement events**

|  |  |
|--|--|
| <b>ONLINE - Microsoft Teams</b><br><b>Wednesday 13th Nov</b><br>2pm-3:30pm | <b>ONLINE - Microsoft Teams</b><br><b>Monday 9th Dec</b><br>6pm-7:30pm |
|--|--|

Please visit our consultation webpage to sign up for the online events:  
[www.monmouthshire.gov.uk/rldp-consultation-2024](http://www.monmouthshire.gov.uk/rldp-consultation-2024)





# Helpwch i lunio dyfodol Sir Fynwy

**Dweud  
eich  
Dweud**

Mae Cyngor Sir Fynwy yn ymgynghori ar ei Gynllun Datblygiad Lleol Newydd Adnued (CDLIA) a fydd yn cwmpasu'r cyfnod 2018-2033.

Mae hyn yn gosod tir ar gyfer cartrefi a swyddi ac amddiffyn ein hamgylchedd.

Bydd ymgynghori ac ymgysylltu â'r cyhoedd yn rhedeg o'r 4ydd Tachwedd i'r 16eg Rhagfyr 2024.

Gweler dyddiadau'r sesiynau galw heibio. Neu sganiwch y cod QR isod i ddarganfod mwy.



## Digwyddiadau Ymgysylltu Galw Heibio

**Canolfan Gymunedol Hen Ysgol Eglwys Rhaglan,**  
Chepstow Road, Rhaglan  
Dydd Mawrth 12fed  
Tachwedd, 2pm-7pm

**Neuadd Farchnad y Fenni,**  
Cross Street, Y Fenni  
Dydd Iau 14eg Tachwedd,  
2pm-7pm

**Hyb Cymunedol Brynbuga,** Maryport  
Street, Brynbuga  
Dydd Llun 18fed  
Tachwedd, 2pm-7pm

**Canolfan Palmer, Y Stryd Fawr,** Cas-gwent  
Dydd Iau 21ain  
Tachwedd, 2pm-7pm

**Y Neuadd Sirol, Sgwâr Agincourt,** Trefynwy  
Dydd Llun 25ain  
Tachwedd, 2pm-7pm

**Capel y Bedyddwyr Magwyr,** Y Sgwâr, Magwyr  
Dydd Mercher 27ain  
Tachwedd, 2pm-7pm

**Neuadd Hamdden Porth Sgiwed,** Manor Way,  
Porth Sgiwed  
Dydd Gwener 29ain  
Tachwedd, 2pm-7pm

**Neuadd Bentref Goetre,** Newton Road, Penperlleni  
Dydd Llun 2il Rhagfyr,  
2pm-7pm

**Adeilad Cyngor Tref Cil-y-coed,** Sandy Lane,  
Cil-y-coed  
Dydd Mercher 4ydd  
Rhagfyr, 2pm-7pm

## Digwyddiadau Ymgysylltu Ar-lein

**AR-LEIN - Microsoft Teams**  
Dydd Mercher 13eg  
Tachwedd, 2pm-3:30pm

**AR-LEIN - Microsoft Teams**  
Dydd Llun 9fed Rhagfyr,  
6pm-7:30pm

Ewch i'n tudalen ymgynghori i gofrestru ar gyfer y digwyddiadau ar-lein:

[www.monmouthshire.gov.uk/cy/rldp-consultation-2024](http://www.monmouthshire.gov.uk/cy/rldp-consultation-2024)



## Appendix 6: Consultation Leaflet



**monmouthshire**  
sir fynwy



# Monmouthshire County Council's Replacement Local Development Plan (RLDP) 2018-2033

**Land for Homes and Jobs and  
Protecting our Environment**

We're consulting on the RLDP  
between: 4th Nov - 16th Dec 2024.

For more information on the RLDP  
proposals, including consultation  
events throughout Monmouthshire,  
please visit:

[www.monmouthshire.gov.uk/  
rldp-consultation-2024](http://www.monmouthshire.gov.uk/rldp-consultation-2024)

Consultation is open between:  
**4th Nov - 16th Dec 2024**  
**Tel: 01633 644429**



**Site location**



### What's happening in Chepstow?

**The RLDP proposes:**

**Land at Mouton Road**

- Approx. 146 new Net Zero Carbon homes, of which approx. 73 will be affordable.
- Commercial uses, such as a hotel and residential care home.

**Newhouse Industrial Estate**

- 2.5ha of employment land to support Chepstow's job growth.





# Cynllun Datblygu Lleol Newydd (CDLIN) Cyngor Sir Fynwy 2018-2033

Tir ar gyfer Cartrefi a Swyddi ac  
Amddiffyn ein Hamgylchedd.

Rydym yn ymgynghori ar y CDLIN  
rhwng: 4ydd Tachwedd a 16eg  
Rhagfyr 2024.

Am fwy o wybodaeth am  
gynigion y CDLIN, gan gynnwys  
digwyddiadau ymgynghori ledled  
Sir Fynwy, ewch i:

[www.monmouthshire.gov.uk/cy/  
ymgyngoriad-cdlin-2024](http://www.monmouthshire.gov.uk/cy/ymgyngoriad-cdlin-2024)

Mae'r ymgynghoriad ar agor rhwng:  
**4ydd Tachwedd a 16eg Rhagfyr  
2024. Rhif Ffôn: 01633 644429**



## Lleoliad y safle



## Beth sy'n digwydd yng Nghas-gwent?

**Mae'r CDLIN yn cynnig:**

### Tir yn Fford Mounon

- Tua 146 o gartrefi Carbon Sero Net newydd, a tua 73 ohonynt yn fforddiadwy.
- Defnyddiau masnachol, fel gwesty a chartref gofal preswyl.

### Ystâd Ddiwydiannol Newhouse

- 2.5 hectar o dir cyflogaeth i gefnogi twf swyddi yng Nghas-gwent.



## Appendix 7: Consultation A-Board

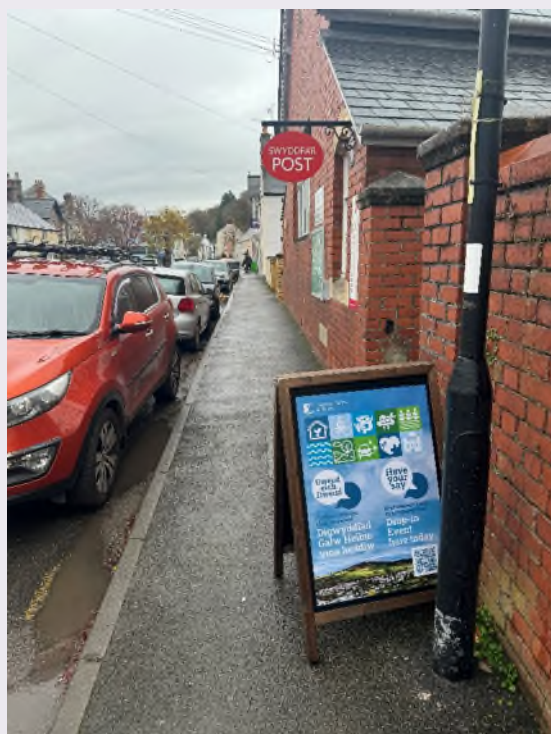
### Abergavenny



### Monmouth



### Usk



### Chepstow



## Appendix 8: Deposit Matters Notice

Planning and Compulsory Purchase Act 2004 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (Regulation 17) (as amended 2015)

Notice of Deposit Proposals for a Replacement Local Development Plan

Monmouthshire Replacement Local Development Plan 2018 – 2033

Monmouthshire County Council has prepared Deposit Plan documents for the above plan. The Replacement Local Development Plan (RLDP) will, upon adoption, replace the current development plan and be the basis for decisions on land use planning for the County of Monmouthshire (excluding the area within the Bannau Brycheiniog National Park).

The Deposit proposals documents include the Deposit RLDP, the Integrated Sustainability Appraisal (which incorporates the Strategic Environmental Assessment), the Habitats Regulations Assessment, an Initial Consultation Report together with other supporting documents.

Comments are invited on the Deposit Plan proposals documents which outline the Authority's vision, strategy, detailed policies and site allocations, and include key background information.

Consultation on the Deposit RLDP will run from 4<sup>th</sup> November to 16<sup>th</sup> December 2024. The Deposit consultation documents are available to view at:

- the Council's website: [www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/)
- County Hall, Usk
- MCC Community Hubs (Abergavenny, Caldicot, Chepstow, Gilwern, Monmouth and Usk), during normal opening hours.
- A series of virtual and drop-in sessions to be held at several venues throughout the County. Details of venues, dates and times can be found on the Council's website.

The closing date for the submission of comments on the Monmouthshire Deposit consultation documents is **midnight on 16<sup>th</sup> December 2024**.

Comments should be submitted via:

- the online representation form ([www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/))
- the standard representation form which is available on the Council's website or at the locations listed above.
- emailed to [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)
- posted to Planning Policy, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA.

Representations should specify the particular part of the Plan to which they relate by paragraph, policy number, or proposals map. In the case of a perceived omission respondents

should indicate the proposed new policy, supporting text, or location of a new or amended site. Respondents should identify how their representation fits with the overall strategy and the Integrated Sustainability Appraisal. This will be essential where the representation seeks the inclusion of a new or amended site or the incorporation of a site rejected by the Authority. All representations made about the Plan will be available for the public to view.

The Deposit RLDP will be considered by an independent Inspector who will assess whether it is 'sound'. There are a number of tests of soundness and objections to the Deposit RLDP should refer to these tests wherever possible.

Representations may be accompanied by a request to be notified at a specified address of the next stage of the RLDP and/or that the RLDP has been submitted to the Welsh Government for Independent Examination and/or of the adoption of the plan.

The Authority is only required to consider representations made in accordance with this notice (duly made). Only those making representations seeking to change the Deposit RLDP whose representations are 'duly made' have the right to appear and be heard by the Inspector at the Examination.

Further information on the RLDP process and relevant background documents are available on the Council's website at [www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/)

Craig O'Connor  
Head of Placemaking

**Deddf Cynllunio a Phrynu Gorfodol 2004**  
**Rheoliadau Asesiad Amgylcheddol o Gynlluniau a Rhaglenni (Cymru) 2004**  
**Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol) (Cymru) 2005**  
**(Rheoliad 17) (fel y'i diwygiwyd 2015)**

**Rhybudd o Gynigion Adneuo ar gyfer Cynllun Datblygu Lleol Amnewid**

**Cynllun Datblygu Lleol Amnewid Sir Fynwy 2018 – 2033**

Mae Cyngor Sir Fynwy wedi paratoi dogfennau Cynllun Adnau ar gyfer y cynllun uchod. Ar ôl ei fabwysiadu, bydd y Cynllun Datblygu Lleol Amnewid yn disodli'r cynllun datblygu presennol a bydd yn sail i benderfyniadau ar gynllunio defnydd tir ar gyfer Sir Fynwy (ac eithrio'r ardal o fewn Parc Cenedlaethol Bannau Brycheiniog).

Mae'r dogfennau cynigion Adnau yn cynnwys y CDLIA Adnau, yr Arfarniad o Gynaliadwyedd Integredig (sy'n ymgorffori'r Asesiad Amgylcheddol Strategol), yr Asesiad Rheoliadau Cynefinoedd, Adroddiad Ymgynghori Cychwynol ynghyd â dogfennau ategol eraill.

Gwahoddir sylwadau ar ddogfennau cynigion y Cynllun Adnau sy'n amlinellu gweledigaeth, strategaeth, polisiau manwl a dyraniadau safleoedd yr Awdurdod, ac sy'n cynnwys gwybodaeth gefndir allweddol.

Bydd yr ymgynghoriad ar y CDLIA Adnau yn cael ei gynnal rhwng 4ydd Tachwedd a'r 16eg Rhagfyr 2024. Mae'r dogfennau ymgynghori ar gael i'w gweld yma:

- gwefan y Cyngor: [www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/)
- Neuadd y Sir, Brynbuga
- Hybiau Cymunedol Cyngor Sir Fynwy (Y Fenni, Cil-y-coed, Cas-gwent, Gilwern, Trefynwy a Brynbuga), yn ystod oriau agor arferol.
- Cyfres o sesiynau rhithwir a galw heibio sydd i'w cynnal mewn sawl lleoliad ar draws y Sir. Mae manylion y lleoliadau, dyddiadau ac amseroedd ar gael ar wefan y Cyngor.

Y dyddiad cau ar gyfer cyflwyno sylwadau ar ddogfennau ymgynghori Adnau Sir Fynwy yw **hanner nos ar 16eg Rhagfyr 2024**.

Dylid cyflwyno sylwadau drwy:

- y ffurflen sylwadau ar-lein ([www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/))
- y ffurflen sylwadau safonol sydd ar gael ar wefan y Cyngor neu yn y lleoliadau a restrir uchod.
- e-bostio [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)
- ei bostio i Polisi Cynllunio, Cyngor Sir Fynwy, Neuadd y Sir, Y Rhadyr, Brynbuga, NP15 1GA.

Dylai sylwadau nodi'r rhan benodol o'r Cynllun y maent yn berthnasol iddo drwy gyfeirio at baragraff, rhif polisi, neu fap cynigion. Yn achos diffyg canfyddedig, dylai ymatebwyr nodi'r polisi newydd arfaethedig, y testun ategol, neu leoliad safle newydd neu ddiwygiedig. Dylai ymatebwyr nodi sut mae eu sylwadau yn cyd-fynd â'r strategaeth gyffredinol a'r Arfarniad o Gynaliadwyedd Integredig. Bydd hyn yn hanfodol pan fo'r sylw yn ceisio cynnwys safle newydd

neu ddiwygiedig neu'n ymgorffori safle a wrthodwyd gan yr Awdurdod. Bydd yr holl sylwadau a wneir am y Cynllun ar gael i'r cyhoedd eu gweld.

Bydd y CDLIA Adnau yn cael ei ystyried gan Arolygydd annibynnol a fydd yn asesu a yw'n 'gadarn'. Mae nifer o brofion cadernid a dylai gwrthwynebiadau i'r CDLIA gyfeirio at y profion hyn lle bynnag y bo modd.

Mae modd cyflwyno cais gyda sylwadau yn gofyn am gael gwybod mewn cyfeiriad penodol am gam nesaf y CDLIA a/neu pan fo'r CDLIA wedi'i gyflwyno i Lywodraeth Cymru i'w Archwilio'n Annibynnol a/neu am fabwysiadu'r cynllun.

Mae ond yn ofynnol i'r Awdurdod ystyried sylwadau a wneir yn unol â'r hysbysiad hwn (a wnaed yn briodol). Dim ond y rhai sy'n cyflwyno sylwadau sy'n ceisio newid y CDLIA Adnau a bod eu sylwadau 'wedi'u gwneud yn briodol' sydd â'r hawl i ymddangos a chael gwrandawriad gan yr Arolygydd yn yr Archwiliad.

Mae rhagor o wybodaeth am broses y CDLIA a'r dogfennau cefndir perthnasol ar gael ar wefan y Cyngor yn [www.monmouthshire.gov.uk/rldp-consultation-2024/](http://www.monmouthshire.gov.uk/rldp-consultation-2024/)

Craig O'Connor  
Pennaeth Creu Lleoedd



## Appendix 9: RLDP Site Allocation Notice



### Cynllun Datblygu Lleol Amnewid Sir Fynwy Monmouthshire Replacement Local Development Plan 2018 – 2033

#### Ymgynghoriad ar Gynllun Adnau'r CDLIA

Mae Cyngor Sir Fynwy yn ymgynghori ar y Cynllun Datblygu Lleol Amnewid Adnau (CDLIA) a dogfennau ategol am gyfnod o 6 wythnos rhwng 04/11/24 a 16/12/24. Mae'r safle a ddangosir mewn coch ar y cynllun wedi'i nodi ar gyfer tai ar Dir ar Fferm Penlanlas, Y Fenni. Dyma'ch cyfle i wneud sylwadau ar gynnwys y safle hwn neu unrhyw un o'r polisiau a'r dyraniadau/dynodiadau o fewn y CDLIA.

#### RLDP Deposit Plan Consultation

Monmouthshire County Council is consulting on the Deposit Replacement Local Development Plan (RLDP) and supporting documents for a 6-week period between 04/11/24 and 16/12/24. The site shown in red on the plan has been identified for housing on Land at Penlanlas Farm, Abergavenny. This is your opportunity to comment on the inclusion of this site or any of the policies and allocations/designations within the RLDP.

#### Dweud eich dweud...

I ddarllen y CDLIA Adnau, a dogfennau ategol, ac i gyflwyno sylwadau:

- Ewch i'n gwefan ymgynghori:  
<https://www.monmouthshire.gov.uk/rldp-consultation-2024/>
- Ewch i ymweld â Neuadd y Sir neu Hyb Cymunedol
- Mynychwch y **Sesiynau Galw Heibio** sydd i'w cynnal- ewch i'n gwefan ymgynghori am fanylion.
- Mynychwch **Ddigiwyddiad Ymgysylltu Ar-lein**:  
2 – 3:30pm, 13/11/24  
6 – 7:30pm, 09/12/24

#### Have your say...

To view the Deposit RLDP, and supporting documents, and to submit comments:

- Visit our consultation website:  
<https://www.monmouthshire.gov.uk/rldp-consultation-2024/>
- Visit County Hall or a Community Hub
- Attend a **Drop In Session** - see our consultation website for details.
- Attend an **Online Engagement Event**:  
2 – 3:30pm, 13/11/24  
6 – 7:30pm, 09/12/24



Sganiwch y Cod QR  
Scan the QR code



Dylid gwneud sylwadau ar y CDLIA Adnau erbyn **canol nos 16<sup>th</sup> Rhagfyr 2024**  
Comments on the Deposit RLDP should be made by **midnight 16<sup>th</sup> December 2024**

## Appendix 10: Adjacent Properties Letter



**monmouthshire**  
**sir fynwy**

Monmouthshire County Council  
County Hall, The Rhadyr, Usk,  
NP15 1GA

Cyngor Sir Fynwy  
Neuadd y Sir, Y Rhadyr,  
Brunbuga, NP15 1GA

Tel/Ffôn: 01633 644429

E-Mail/Ebost: [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

Web/Gwefan: [www.monmouthshire.gov.uk](http://www.monmouthshire.gov.uk)

Our Ref/Ein Cyf: Deposit RLDP

Your Ref/Eich Cyf:

Date/Dyddiad: 1st November 2024

Dear Sir/Madam

### **Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033**

### **Deposit Plan Consultation: 4<sup>th</sup> November – 16<sup>th</sup> December 2024**

Monmouthshire County Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Bannau Brycheiniog National Park) which will cover the period 2018 – 2033. The RLDP allocates land for development, designates land for protection and contains policies to provide the basis for decisions on planning applications. The Plan has reached a key stage in the preparation process known as the Deposit Plan and includes detailed proposals and policies.

At the meeting of the Council on 24<sup>th</sup> October 2024, the Deposit RLDP was endorsed for public consultation.

We are writing to you because, as you can see from the enclosed notice, your property is close to a site(s) allocated for development in the Deposit Plan. Please find enclosed a leaflet identifying the site and proposed use and how you can find out more about the policies and proposals contained in the Deposit RLDP and how to make comments.

Full details of the Deposit RLDP and its supporting evidence can be found on the Council's website at [www.monmouthshire.gov.uk/rldp-consultation-2024](http://www.monmouthshire.gov.uk/rldp-consultation-2024)

A six-week consultation will take place on the Deposit RLDP from **4<sup>th</sup> November to 16<sup>th</sup> December 2024**. All responses must be received by midnight on 16<sup>th</sup> December 2024. Responses cannot be accepted after this date. Please note that all comments received will be available for public inspection and cannot be treated as confidential. If you wish to make comments you are encouraged to use the online form which can be found on the Council's website noted above.

Yours faithfully

Planning Policy Team



**monmouthshire**  
**sir fynwy**

Monmouthshire County Council  
County Hall, The Rhadyr, Usk,  
NP15 1GA

Cyngor Sir Fynwy  
Naudd y Sir, Y Rhadyr,  
Brunbuga, NP15 1GA

Tel/Ffôn: 01633 644429

E-Mail/Ebost: [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

Wcb/Gwefan: [www.monmouthshire.gov.uk](http://www.monmouthshire.gov.uk)

Our Rctf/Ein Cyf: Deposit RLDP

Your Rctf/Eich Cyf:

Date/Dyddiad: 1st November 2024

Annwyl Syr/Fadam

### **Cynllun Datblygu Lleol Amnewid (CDLIA) Sir Fynwy 2018-2033**

#### **Ymgynghoriad ar y Cynllun Adnau: 4ydd Tachwedd – 16eg Rhagfyr 2024**

Mae Cyngor Sir Fynwy yn paratoi Cynllun Datblygu Lleol Amnewid (CDLIA) ar gyfer y Sir (ac eithrio'r ardal o fewn Parc Cenedlaethol Bannau Brycheiniog) a fydd yn cwmpasu'r cyfnod 2018 – 2033. Mae'r CDLIA yn dyrannu tir i'w ddatblygu, yn dynodi tir i'w warchod ac yn cynnwys polisiau er mwyn darparu sail ar gyfer penderfyniadau ar geisiadau cynllunio. Mae'r Cynllun wedi cyrraedd cyfnod allweddol yn y broses o baratoi a adwaenir fel y Cynllun Adnau ac mae'n cynnwys cynigion a pholisiau manwl.

Yng nghyfarfod y Cyngor ar 24ain Hydref 2024, cymeradwywyd y CDLIA Adnau ar gyfer ymgynghoriad cyhoeddus.

Rydym yn ysgrifennu atoch oherwydd, fel y gwelwch o'r hysbysiad amgaeedig, mae eich eiddo yn agos at safle(oedd) a neilltuwyd ar gyfer datblygu yn y Cynllun Adnau. Amgaeir taflen yn nodi'r safle a'r defnydd arfaethedig a sut y gallwch gael rhagor o wybodaeth am y polisiau a'r cynigion sydd wedi'u cynnwys yn y CDLIA Adnau a sut i wneud sylwadau.

Mae manylion llawn y CDLIA Adnau a'i dystiolaeth ategol ar gael ar wefan y Cyngor - [www.monmouthshire.gov.uk/rldp-consultation-2024](http://www.monmouthshire.gov.uk/rldp-consultation-2024)

Cynhelir ymgynghoriad chwe wythnos ar y CDLIA Adnau rhwng **4ydd Tachwedd a'r 16eg Rhagfyr 2024**. Rhaid derbyn pob ymateb erbyn hanner nos ar 16eg Rhagfyr 2024. Ni ellir derbyn ymatebion ar ôl y dyddiad hwn. Sylwch y bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd eu harchwilio ac ni ellir eu trin yn gyfrinachol. Os dymunwch wneud sylwadau, fe'ch anogir i ddefnyddio'r ffurflen ar-lein sydd i'w chael ar wefan y Cyngor fel y nodir uchod.

Yr eiddoch yn gywir

Tim Polisi Cynllunio

## Appendix 11: Approximate Number of Representations by RLDP Policy

| RLDP Section  | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|---|---|---------|-----------|---------|------------------------------|
| Key Issues, Challenges and Opportunities            | Key Issues  | 13      | 36        | 24      | 73                           |
|   | RLDP Vision   | 6       | 16        | 14      | 36                           |
|   | RLDP Objectives   | 14      | 48        | 18      | 80                           |
| RLDP Sustainable and Resilient Communities Strategy | Strategic Policy 1 – Growth Strategy  | 5       | 184       | 21      | 210                          |
|   | Strategic Policy 2 – Spatial Distribution of Development – Settlement Hierarchy | 8       | 152       | 26      | 186                          |
| Managing Settlement Form                            | OC1 – New Built Development in the Open Countryside                             | 1       | 21        | 7       | 29                           |
|   | GW1 – Green Wedge Designations  | 2       | 16        | 18      | 36                           |
| Placemaking and Design                              | Strategic Policy S3 – Sustainable Placemaking & High-Quality Design             | 3       | 31        | 14      | 48                           |
|   | PM1 – Creating Well-Designed Places   | 3       | 10        | 7       | 20                           |
|   | PM2 – Environmental Amenity   | 1       | 6         | 3       | 10                           |
|   | PM3 – Advertisements  | 1       | 2         | 0       | 3                            |
|   | HE1 – Conservation Areas  | 0       | 6         | 0       | 6                            |

| RLDP Section                                      | RLDP Policy  | Comment | Objection | Support | Total No. of Representations |
|---|--|---------|-----------|---------|------------------------------|
|   | HE2 – Design of Shop Fronts in Conservation Areas                        | 1       | 1         | 1       | 3                            |
|   | HE3 – Roman Town of Caerwent   | 1       | 0         | 2       | 3                            |
| Climate Change                                    | Strategic Policy 4 – Climate Change                                      | 10      | 95        | 18      | 123                          |
|   | Policy NZ1 – Monmouthshire Net Zero Carbon Homes                         | 4       | 35        | 16      | 55                           |
|   | CC1 – Sustainable Drainage Systems                                       | 5       | 9         | 8       | 22                           |
|   | CC2 – Renewable Energy Allocation  | 2       | 9         | 1       | 12                           |
|   | CC3 – Renewable Energy Generation  | 1       | 5         | 3       | 9                            |
| Green Infrastructure, Landscape & Nature Recovery | Strategic Policy 5 – Green Infrastructure, Landscape and Nature Recovery | 4       | 55        | 26      | 85                           |
|   | GI1 – Green Infrastructure   | 3       | 6         | 11      | 20                           |
|   | GI2 – Trees, Woodland and Hedgerows                                      | 0       | 2         | 1       | 3                            |
|   | LC1 – Landscape Character  | 3       | 5         | 4       | 12                           |
|   | LC2 – Blaenavon Industrial Landscape World Heritage Site                 | 0       | 0         | 1       | 1                            |
|   | LC3 – Bannau Brycheiniog National Park                                   | 1       | 1         | 2       | 4                            |

| RLDP Section   | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|----------------|---|---------|-----------|---------|------------------------------|
|                | LC4 – Wye Valley National Landscape (AONB)  | 0       | 2         | 2       | 4                            |
|                | LC5 – Dark Skies and Lighting   | 0       | 2         | 2       | 4                            |
|                | NR1 – Nature Recovery and Geodiversity  | 2       | 9         | 5       | 16                           |
|                | NR2 – Severn Estuary Recreational Pressure  | 1       | 3         | 1       | 5                            |
|                | NR3 – Protection of Water Sources and the Water Environment                             | 8       | 9         | 2       | 19                           |
|                | PROW1 – Public Rights of Way  | 2       | 2         | 1       | 5                            |
| Infrastructure | Strategic Policy S6 – Infrastructure  | 12      | 138       | 15      | 165                          |
|                | IN1 – Telecommunications, Broadband, and Other Digital Infrastructure                   | 1       | 4         | 1       | 6                            |
| New Housing    | H1 – Residential Development in Primary and Secondary Settlements                       | 0       | 8         | 4       | 12                           |
|                | H2 – Residential Development in Main Rural Settlements                                  | 3       | 2         | 1       | 6                            |
|                | H3 – Residential Development in Minor Rural Settlements                                 | 0       | 10        | 1       | 11                           |
|                | H4 – Conversion/Rehabilitation of Buildings in the Open Countryside for Residential Use | 0       | 3         | 1       | 4                            |

| RLDP Section            | RLDP Policy  | Comment | Objection | Support | Total No. of Representations |
|-------------------------|--|---------|-----------|---------|------------------------------|
|                         | H5 – Replacement Dwellings in the Open Countryside           | 0       | 0         | 0       | 0                            |
|                         | H6 – Extension of Rural Dwellings                            | 0       | 0         | 0       | 0                            |
|                         | H7 – Specialist Housing                                      | 5       | 3         | 0       | 8                            |
|                         | H8 – Housing Mix   | 5       | 12        | 2       | 19                           |
| Affordable Housing      | Strategic Policy S7 – Affordable Housing                     | 12      | 76        | 25      | 113                          |
|                         | H9 – Affordable Housing Exception Sites                      | 2       | 11        | 3       | 16                           |
| Residential Allocations | Strategic Policy S8 – Site Allocation Placemaking Principles | 7       | 38        | 6       | 51                           |
|                         | Table: HA1 – HA18  | 2       | 2         | 0       | 4                            |
|                         | HA1 – Land to the East of Abergavenny                        | 12      | 59        | 16      | 87                           |
|                         | HA2 – Land to the East of Caldicot/North of Portskewett      | 10      | 159       | 5       | 174                          |
|                         | HA3 – Land Mounton Road, Chepstow                            | 5       | 320       | 2       | 327                          |
|                         | HA4 – Land at Leasbrook, Monmouth                            | 7       | 148       | 2       | 157                          |
|                         | HA5- Land at Penlanlas Farm, Abergavenny                     | 1       | 21        | 2       | 24                           |



| RLDP Section | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|--------------|---|---------|-----------|---------|------------------------------|
|              | HA6 – Land at Rockfield Road, Monmouth                      | 3       | 3         | 2       | 8                            |
|              | HA7 – Land at Drewen Farm, Monmouth                         | 2       | 9         | 1       | 12                           |
|              | HA8 – Land at Tudor Road, Wyesham, Monmouth                 | 1       | 0         | 0       | 1                            |
|              | HA9 – Land at Former MoD, Caerwent                          | 4       | 7         | 2       | 13                           |
|              | HA10 – Land South of Monmouth Road, Raglan                  | 3       | 27        | 1       | 31                           |
|              | HA11 – Land-east of Burrium Gate, Usk                       | 3       | 44        | 3       | 50                           |
|              | HA12 – Land West of Trem Yr Ysgol, Penperlleni              | 2       | 17        | 1       | 20                           |
|              | HA13 – Land adjacent to Piercefield Public House, St Arvans | 3       | 8         | 1       | 12                           |
|              | HA14 – Land at Churchfields, Devauden                       | 3       | 9         | 1       | 13                           |
|              | HA15 – Land East of Little Mill                             | 6       | 8         | 4       | 18                           |
|              | HA16 – Land North of Little Mill                            | 4       | 9         | 0       | 13                           |
|              | HA17 – Land Adjacent to Llanellen Court Farm, Llanellen     | 2       | 22        | 1       | 25                           |
|              | HA18 – Land West of Redd Landes, Shirenewton                | 1       | 95        | 2       | 98                           |

| RLDP Section           | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|------------------------|---|---------|-----------|---------|------------------------------|
| Gypsy and Travellers   | Strategic Policy S9 – Gypsy and Travellers            | 3       | 56        | 7       | 66                           |
|                        | GT1 – Gypsy, Traveller and Showpeople Sites           | 1       | 4         | 0       | 5                            |
| Employment and Economy | Strategic Policy E10 – Employment Sites Provision     | 4       | 23        | 8       | 35                           |
|                        | EA1 – Employment Allocations                          | 6       | 25        | 8       | 39                           |
|                        | EA1a – Land at Nantgavenny Business Park, Abergavenny | 1       | 5         | 0       | 6                            |
|                        | EA1b – Poultry Units, Rockfield Road, Monmouth        | 2       | 0         | 2       | 4                            |
|                        | EA1c – Land North of Wonastow Road, Monmouth          | 1       | 2         | 3       | 6                            |
|                        | EA1d – Newhouse Industrial Estate, Chepstow           | 1       | 1         | 1       | 3                            |
|                        | EA1e – Land Adjoining Ok Grove Farm, Caldicot         | 1       | 3         | 0       | 4                            |
|                        | EA1f – Quay Point, Magor                              | 1       | 8         | 1       | 10                           |
|                        | EA1g – Rockfield Farm, Undy                           | 1       | 0         | 0       | 1                            |
|                        | EA1h – Gwent Euro Park, Magor                         | 3       | 5         | 0       | 8                            |
|                        | EA1i – Raglan Enterprise Park, Raglan                 | 1       | 2         | 0       | 3                            |

| RLDP Section     | RLDP Policy  | Comment | Objection | Support | Total No. of Representations |
|------------------|--|---------|-----------|---------|------------------------------|
|                  | EA1j – Land West of Raglan   | 2       | 13        | 1       | 16                           |
|                  | EA1k – Land to the East of Abergavenny   | 1       | 2         | 1       | 4                            |
|                  | EA1l – Land at Former MoD Site, Caerwent   | 2       | 1         | 0       | 3                            |
|                  | EA1m – Land to the East of Caldicot/North of Portskewett                                       | 1       | 4         | 0       | 5                            |
|                  | EA2 – Protected Employment Sites   | 2       | 3         | 3       | 8                            |
|                  | E1 – Protection of Existing Employment land  | 0       | 3         | 0       | 3                            |
|                  | E2 – Non-Allocated Employment Sites  | 0       | 2         | 0       | 2                            |
| Rural Enterprise | Strategic Policy S11 – Rural Economy   | 1       | 3         | 0       | 4                            |
|                  | RE1 – Secondary and Main Rural Settlements Employment Exceptions                               | 1       | 1         | 0       | 2                            |
|                  | RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use | 0       | 0         | 0       | 0                            |
|                  | RE3 – Agriculture Diversification  | 0       | 0         | 0       | 0                            |
|                  | RE4 – New Agricultural and Forestry Buildings  | 0       | 0         | 0       | 0                            |

| RLDP Section          | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|-----------------------|---|---------|-----------|---------|------------------------------|
|                       | RE5 – Intensive Livestock / Free Range Poultry Units                              | 0       | 2         | 0       | 2                            |
|                       | RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside      | 0       | 1         | 0       | 1                            |
| Visitor Economy       | Strategic Policy S12 – Visitor Economy  | 1       | 34        | 17      | 52                           |
|                       | T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside | 2       | 5         | 2       | 9                            |
|                       | T2 – Protection of Existing Tourism Facilities                                    | 0       | 0         | 2       | 2                            |
| Sustainable Transport | Strategic Policy S13 – Sustainable Transport                                      | 8       | 66        | 26      | 100                          |
|                       | ST1 – Sustainable Transport Proposals   | 2       | 8         | 1       | 11                           |
|                       | ST2 – Highway Hierarchy   | 0       | 2         | 1       | 3                            |
|                       | ST3 – Freight   | 1       | 2         | 1       | 4                            |
|                       | ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas      | 0       | 0         | 0       | 0                            |
|                       | ST5 – Transport Schemes   | 5       | 2         | 2       | 9                            |
|                       | ST6 – Protection of Redundant Routes  | 1       | 0         | 1       | 2                            |

| RLDP Section                | RLDP Policy  | Comment | Objection | Support | Total No. of Representations |
|-----------------------------|--|---------|-----------|---------|------------------------------|
| Retail & Commercial Centres | Strategic Policy S14 – Town, Local and Neighbourhood Centres   | 2       | 28        | 13      | <b>43</b>                    |
|                             | RC1 – Central Shopping and Commercial Areas  | 0       | 4         | 1       | <b>5</b>                     |
|                             | RC2 – Primary Shopping Frontages   | 0       | 0         | 1       | <b>1</b>                     |
|                             | RC3 – Local Centres and Neighbourhood Centres/Shops  | 1       | 0         | 2       | <b>3</b>                     |
|                             | RC4 – New Retail Proposals Outside of Identified Town and Local Centres                                    | 1       | 2         | 1       | <b>4</b>                     |
| Community Infrastructure    | Strategic Policy S15 – Community and Recreation Facilities   | 3       | 34        | 18      | <b>55</b>                    |
|                             | CI1 – Retention of Existing Community Facilities   | 0       | 2         | 1       | <b>3</b>                     |
|                             | CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas                 | 1       | 5         | 6       | <b>12</b>                    |
|                             | CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing | 2       | 1         | 1       | <b>4</b>                     |
|                             | CI4 – Areas of Amenity Importance  | 1       | 7         | 2       | <b>10</b>                    |
| Minerals                    | Strategic Policy S16 – Sustainable Minerals Management   | 2       | 7         | 8       | <b>17</b>                    |

| RLDP Section        | RLDP Policy  | Comment | Objection | Support | Total No. of Representations |
|---------------------|--|---------|-----------|---------|------------------------------|
|                     | M1 – Local Building and Walling Stone  | 1       | 1         | 1       | 3                            |
|                     | M2 – Minerals Safeguarding Areas   | 1       | 4         | 1       | 6                            |
|                     | M3 – Mineral Site Buffer Zone  | 1       | 1         | 1       | 3                            |
| Waste               | Strategic Policy S17 – Sustainable Waste Management                                  | 1       | 7         | 11      | 19                           |
|                     | W1 – Waste Management Facilities   | 1       | 1         | 1       | 3                            |
|                     | W2 – Agricultural Land – Disposal of Inert Waste                                     | 0       | 1         | 1       | 2                            |
|                     | W3 – Identified Potential Waste Management Sites                                     | 2       | 10        | 1       | 13                           |
| Monitoring & Review | Monitoring and Review  | 0       | 1         | 0       | 1                            |
| Appendices          | Appendix 1 – RLDP Supporting Documents   | 0       | 1         | 0       | 1                            |
|                     | Appendix 2 – RLDP Key Stages   | 0       | 0         | 0       | 0                            |
|                     | Appendix 3 – Regional Strategic Partnerships   | 0       | 0         | 0       | 0                            |
|                     | Appendix 4 – Legislative and Policy Context  | 0       | 1         | 0       | 1                            |
|                     | Appendix 5 – Regional Collaboration and Linkages with Neighbouring Local Authorities | 1       | 1         | 0       | 2                            |

| RLDP Section                      | RLDP Policy                                   | Comment | Objection | Support | Total No. of Representations |
|-----------------------------------|---|---------|-----------|---------|------------------------------|
|                                   | Appendix 6 – RLDP Issues                      | 0       | 0         | 1       | 1                            |
|                                   | Appendix 7 – Housing Supply Components        | 0       | 0         | 1       | 1                            |
|                                   | Appendix 8 – Infrastructure Delivery Plan     | 4       | 11        | 1       | 16                           |
|                                   | Appendix 9 – Housing Trajectory               | 0       | 13        | 4       | 17                           |
|                                   | Appendix 10 – Employment Land Schedule        | 0       | 0         | 1       | 1                            |
|                                   | Appendix 11 – Supplementary Planning Guidance | 1       | 3         | 0       | 4                            |
|                                   | Appendix 12 – Glossary of Terms               | 1       | 3         | 0       | 4                            |
| Background Papers / Evidence Base | Housing Background Paper                      | 1       | 5         | 0       | 6                            |
|                                   | Gypsy & Traveller Accommodation Assessment    | 0       | 1         | 0       | 1                            |
|                                   | Settlement Boundary Review                    | 0       | 5         | 3       | 8                            |
|                                   | Infrastructure Delivery Plan                  | 1       | 1         | 0       | 2                            |
|                                   | Sustainable Settlement Appraisal              | 0       | 3         | 0       | 3                            |
|                                   | Minerals Background Paper                     | 0       | 1         | 0       | 1                            |
|                                   | Areas of Amenity Importance Review            | 0       | 1         | 0       | 1                            |
|                                   | Open Space Study                              | 0       | 3         | 0       | 3                            |



| RLDP Section | RLDP Policy   | Comment | Objection | Support | Total No. of Representations |
|--------------|---|---------|-----------|---------|------------------------------|
|              | Emerging Green Infrastructure Strategy  | 1       | 0         | 0       | 1                            |
|              | Candidate Site Assessment Report  | 0       | 1         | 0       | 1                            |
| Misc         | Constraints Map   | 0       | 1         | 0       | 1                            |
|              | ISA   | 4       | 19        | 1       | 24                           |
|              | HRA   | 5       | 11        | 0       | 16                           |
|              | Other   | 33      | 96        | 6       | 135                          |
|              | Soundness   | 115     | 407       | 90      | 612                          |
|              | Alternative Sites   | 67      | 83        | 3       | 153                          |
|              | Effects the Deposit Plan would have on the use of the Welsh Language.                   | 118     | 19        | 3       | 140                          |
|              | How the effects of the Deposit Plan on the use of the Welsh language could be improved. | 91      | 13        | 1       | 105                          |

## Appendix 12: Deposit RLDP Representation Responses

- App 12- Guidance note
- App 12- Vol 1 Key Issues Challenges and Opportunities
- App 12- Vol 2 RLDP Strategic Framework
- App 12- Vol 3 Placemaking and Design
- App 12- Vol 4 Climate Change
- App 12- Vol 5 Green Infrastructure Landscape Nature Recovery
- App 12- Vol 6 Infrastructure
- App 12- Vol 7 New Housing
- App 12- Vol 8 Affordable Housing
- App 12- Vol 9a Residential Allocations S8 & HA1 to HA2
- App 12- Vol 9b Residential Allocations HA3
- App 12- Vol 9c Residential Allocations HA4
- App 12- Vol 9d Residential Allocations HA5 to HA18 & Allocation Table
- App 12- Vol 10 Gypsy and Travellers
- App 12- Vol 11 Employment and Economy
- App 12- Vol 12 Visitor Economy
- App 12- Vol 13 Sustainable Transport
- App 12- Vol 14 Retail and Commercial Centres
- App 12- Vol 15 Community Infrastructure
- App 12- Vol 16 Minerals and Waste
- App 12- Vol 17 Monitoring and Appendices
- App 12- Vol 18 Alternative Sites
- App 12- Vol 19 Maps and General Representations
- App 12- Vol 20 HRA & ISA
- App 12- Vol 21 Background Papers
- App 12- Vol 22 Soundness
- App 12- Vol 23 Welsh Language