



# **Monmouthshire Replacement Local Development Plan**

**2018-2033**

**Report Of Consultation: Appendix 12**  
**Deposit RLDP Representation Responses**

Volume 11 – Employment & Economy

## Contents

<b>Employment &amp; Economy .....</b>	<b>1</b>
Strategic Policy S10 – Employment Sites Provision .....	1
Policy EA1 – Employment Allocations .....	15
Policy EA1a – Land at Nantgavenny Business Park, Abergavenny .....	32
Policy EA1b – Poultry Units, Rockfield Road, Monmouth.....	38
Policy EA1c – Land North of Wonastow Road, Monmouth .....	40
Policy EA1d – Newhouse Industrial Estate, Chepstow .....	43
Policy EA1e – Land adjoining Oak Grove Farm, Caldicot .....	44
Policy EA1f – Quay Point, Magor .....	46
Policy EA1g – Rockfield Farm, Undy .....	58
Policy EA1h – Gwent Euro Park, Magor.....	59
Policy EA1i – Raglan Enterprise Park, Raglan.....	67
Policy EA1j – Land West of Raglan.....	69
Policy EA1k – Land to the East of Abergavenny.....	91
Policy EA1l – Land at Former MoD Site, Caerwent.....	93
Policy EA1m – Land to the East of Caldicot/North of Portskewett.....	95
Policy EA2 – Protected Employment Sites.....	98
Policy E1 – Protection of Existing Employment Land .....	101
Policy E2 – Non-Allocated Employment Sites.....	103
Strategic Policy S11 – Rural Economy.....	105
Policy RE1 – Secondary and Main Rural Settlements Employment Exceptions.....	107
Policy RE5 – Intensive Livestock / Free Range Poultry Units .....	108
Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside .....	110

## Employment & Economy

### Strategic Policy S10 – Employment Sites Provision

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1356 / Welsh Government / Support	Strategic Policy S10 makes provision for 57ha to deliver a minimum requirement of 38ha of employment land. This is supported by the Council's Employment Land Review advising that employment forecasts are based on past take-up rates plus a five-year buffer, equating to 38ha over the plan period. The 6,240 job growth being sought is based, amongst other things, on reducing the commuting ratio from 2011 census value (1.12) to the 2001 Census value (1.10). The Council's strategy is not to reflect past trends but increase job opportunities. The Welsh Government does not object to the level of employment land provision.	Support for the level of employment land provision is welcomed.	No change required.
3118 / Councillor Meirion Howells / Support	The RLDP seeks to address Monmouthshire's economy issues by promoting a growth level that will promote higher employment growth, support greater labour force retention and achieve a reduction in the net out-flow of commuters. I understand that the level of job growth aligns with the projected population and housing growth with a reduced level of commuting by retaining more of the resident workforce within the County.	Comments noted.	No change required.

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1367 / Abergavenny and District Civic Society / Comment	The number of hectares may need amendment according to the outcome of our objection to Policy EA1.	<p>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>Objections raised in relation to policy EA1 – Employment Allocations, are addressed in the relevant section of the report.</p>	No change required.
2548 / Shirenewton Community Council / Objection	Within the context of housing allocation HA18, Shirenewton has almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Broadband speed is limited, limiting WFH opportunities further.	<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). Policy S2 provides details of the percentage of each by settlement.</p> <p>A key objective in the distribution of growth to Monmouthshire’s sustainable rural settlements is to deliver much needed affordable homes to address rural inequality and rural isolation. It is recognised that there are no formal employment allocations in the rural settlements, however the RLDP does provide the policy framework to support a range of employment opportunities in rural areas including rural enterprises and diversification and tourism initiatives. Shirenewton also benefits from being in close proximity to the primary settlements located in the south of the county including Chepstow and the wider Severnside area and the employment allocations associated with them.</p> <p>With regards to broadband capacity, Strategic Policy S8 – Site Allocation Placemaking Principles, requires new residential allocations to provide broadband/digital infrastructure to serve each new home.</p>	No change required.
3454 / Chepstow Society / Objection	Mitel Telecom in Caldicot in the 1980s and the spin off telecommunication and digital technology companies that were spawned out of it, such as Enigma and Interconnect Communications, both in Chepstow. There	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The Replacement Local Development Plan (RLDP) provides the policy framework to support /enable economic prosperity and sustainable job growth in the county, and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which	No change required.

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	<p>are now a number of Medical Technology companies in the area. These are vital sectors for the growth and development of the economy of the county and for attracting and maintaining that missing demographic. This should be explicitly recognised and actively promoted and encouraged through a targeted policy framework.</p> <p>The RLDP does not identify the diverse nature of the economy as the EES does RLDP undersells strength of Monmouthshire's economy.</p>	<p>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. In this respect, the RLDP is considered to be complementary to the EESS.</p>	
3562 / Gateway to Wales Action Group / Support	Support the relatively low level of employment land proposed and the principles of Policy S10.	Support welcomed.	No change required.
1745 / Redi 205 Ltd / Support	<p>The allocation of deliverable employment land will form a fundamental part of securing the level of local economic growth proposed. Strategic Policy S10 (Employment Sites Provision) is therefore supported, with the provision of 57ha of employment land (to meet a minimum requirement of 38ha) is considered appropriate if the proposed levels of economic growth are to be achieved. The allocation of a minimum of 1 hectare of land for B1 use on the Former MoD Site presents a deliverable and viable employment allocation, which will assist the Local Authority in delivering high- quality purpose built B1 accommodation on a previously developed / highly sustainable site, where employment opportunities can</p>	<p>Support for the level of employment land provision is welcomed. Support for allocation EA1I – Land at Former MOD Site, Caerwent is also welcomed with further detailed comments provided in relation to the allocation in the relevant section of the report.</p>	No change required.

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	be co-located alongside residential dwellings.		
1965 / Monmouthshire Housing Association (MHA) / Support	In principle, MHA support the economic policies.	Support welcomed.	No change required.
1506 / Morspan Pension Scheme / Support	Support Strategic Policy S10 with the provision of 57ha of employment land considered appropriate if the proposed levels of economic growth are to be achieved.	Support welcomed.	No change required.
3824 / Sentiem / Comment	Comments note that development proposals within settlement boundaries that seek to deliver the Council's vision for sustainable economic growth will be permitted, particularly where they reflect the aims of the Economy, Employment & Skills Strategy - Redeveloping the Tintern Abbey Hotel will deliver this.	Comments noted. Assessment of redevelopment proposals for the Tintern Abbey Hotel will be assessed via the planning application process.	No change required.
1646 / Mr Brian Williams / Objection	I don't understand how the employment land calculations are made. In the introduction it says there is 40 ha already banked and proposes 38 ha more, which comes to 78 ha? The approach of having flexible land availability appears akin to land banking.	Reference to 40ha of employment land remaining in paragraph 2.1.18 is referring to the employment land remaining from Adopted Local Development Plan allocations. A review of these sites has been undertaken as part of the evidence base and is set out in the Employment Land Review (Nov 2022). Not all Adopted Local Development Plan employment allocations have been carried forward into the Replacement Local Development Plan (LDP), and do not therefore contribute to the provision figure set out in policy S10. However, some Adopted LDP employment sites have been rolled over and are factored into the provision figure of 57ha.  Details of how the 57ha provision figure has been arrived at are set out in paragraphs 16.3.1. Approximately 9ha is from employment land that has already	No change required.

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		<p>been delivered in the plan period to date (2018-2025) and a further 48ha is from allocations, some of which are included in the 40ha referenced in paragraph 2.1.18.</p> <p>The incorporation of a flexibility allowance is required by national planning policy and is considered to be prudent to allow for a range and choice of sites.</p>	
2616 / Mrs Sarah Turner / Objection	Failed to attract any employment into this area – jobs in the new care home on Elderwood Parc were a redeployment of the staff that were moved from a care home that you closed in Chepstow. Now have more empty shops in Caldicot and Chepstow – please provide a full list of employment you have created in the last 10 years in this area?	<p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. The RLDP 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. The EESS provides details of employment statistics, as well as case study evidence of recent economic successes in Monmouthshire and can be viewed on the Council's website. Further evidence on employment levels can be found in the RLDP's Employment Land Review (Nov 2022) and Employment Land Background Paper.</p> <p>With regards to the level of empty shops in Caldicot and Chepstow, the RLDP provides a supportive policy framework to enable a vibrant mix of uses in the town centres. In addition, the Council's Regeneration team are working to deliver regeneration objectives for both Caldicot and Chepstow and administer the allocation of Town Centre Improvement Grants providing financial support to property improvements in the County's town centres. Furthermore, proposed mixed-use developments in the area will help to increase footfall in the town centres which may encourage further investment to boost the vitality, attractiveness and viability of the centres.</p>	No change required.
2684 / Dr Hopkins / Objection	Need to make it more attractive for different businesses e.g. high tech, medical to locate in the county. More businesses in Severnside Industrial estate is great but will impact on traffic and air pollution - also need to consider impact on transport routes.	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. The Replacement Local Development Plan (RLDP) 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	No change required.

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		<p>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>The RLDP includes a range of policies to address the concerns raised including ST1 – Sustainable Transport Proposals and PM2 – Environmental Amenity. The Plan should be read as a whole.</p>	
3319 / Nr A Andrew Hubert von Staufer / Objection	Monmouth is fundamentally a tourist destination - cannot function as a dormitory commuter town.	<p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements. 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), which will help influence commuting patterns.</p> <p>As noted in the comments, the tourism sector makes a significant contribution to Monmouthshire's economy. In recognition of this, the RLDP provides a policy framework to enable appropriate tourism proposals whilst seeking to protect Monmouthshire's environment and landscape setting.</p>	No change required.
3336 / Mrs Carolyn Chapman / Objection	Development would create immeasurable traffic congestion issues with the very real possibility that this will have a very negative effect on future tourism and hence, the local economy.	<p>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 detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p> <p>In recognition of the significant contribution the tourism sector makes to Monmouthshire's economy, the RLDP provides a policy framework to enable appropriate tourism proposals whilst seeking to protect Monmouthshire's environment and landscape setting.</p>	No change required.
3340 / Mrs Cheryl Cummings / Objection	Job target growth of 6240 jobs is unrealistic. Experts say Monmouthshire will lose 100 jobs in next 20 years	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. 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	No change required.



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		respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region (CCR). Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County. It is also worth noting that not all of these jobs will be in B use classes. 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.	
3358 / Mr Craig Wooler / Objection	Many existing employment sites empty. Don't need anymore. Fill the places already available before building new ones.	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.	No change required.
3432 / Mr Andrew Sutton / Objection	The plan does not account for creating new high-end housing. Please review this sector as small i.e. below 5% of the population, but as highly important in being needed to drive economic growth. These CEOs and Founders like to live near where they work.	There is considered to be a sufficient range and choice of existing properties in Monmouthshire to accommodate the needs of high-end housing. In accordance with national planning policy and its placemaking principles, the RLDP is focussed on delivering housing sites that make the most efficient use of land and address the Council's core objectives of addressing affordability issues in the County and rebalancing our demography. There will, however, be a mix of house types and sizes on new site allocations which will cater for a broad spectrum of occupiers, as required by Policy H8 – Housing Mix.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3444 / Mr Graham Parker / Objection	The economy in Monmouthshire and Wales needs to be encouraged to grow to enable employers and entrepreneurs to invest in localised employment but this will not happen without good infrastructure and road networks.	Reflecting the Council's ambitions for economic prosperity, the Replacement Local Development Plan (RLDP) proposes a policy-on approach to job growth and provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region (CCR). Comments related to infrastructure and the road network are noted. The RLDP incorporates an Infrastructure Delivery Plan to ensure infrastructure needs are addressed and is supplemented by the Local Transport Strategy which establishes a strategic framework for the development of the transport network in Monmouthshire. It identifies the key transport issues relevant to the County, the high-level interventions needed to address these and the specific priorities for Monmouthshire.	No change required.
3445 / Mrs Heidi McAllister / Support	Economic policy to generate more localised work is good. The town centre businesses need more support and new ventures which provide entertainment are needed as these are lacking. Many empty buildings. No free parking to support shops.	Support for the Replacement Local Development Plan's (RLDP) economic policies is welcomed. With regards to town centres, the (RLDP) provides the policy framework to enable a vibrant mix of uses in the County's centres. In addition, the Council's Regeneration team are working to deliver regeneration objectives for both Caldicot and Chepstow and facilitate the allocation of Town Centre Improvement Grants providing financial support to property improvements in all of the County's town centres. Parking fees are beyond the scope of the RLDP.	No change required.
3504 / Ms Alison Grenyer / Objection	This is linked to infrastructure and without this being adequately provided, the local economy will suffer. There is poor commercial offer in Caldicot and without drastic changes in business rates and the re purchase of retail units by the county council the economy will not grow.	Comments related to infrastructure are noted. The RLDP incorporates an Infrastructure Delivery Plan to ensure infrastructure needs are addressed and is supplemented by the Local Transport Strategy which establishes a strategic framework for the development of the transport network in Monmouthshire. It identifies the key transport issues relevant to the County, the high-level interventions needed to address these and the specific priorities for Monmouthshire.  With regards to town centres, the RLDP provides the policy framework to enable a vibrant mix of uses in the County's centres and the proposed mixed-use developments in the area will help to increase footfall in the town centres which may encourage further investment to boost the vitality, attractiveness and viability of the centres. In addition, the Council's Regeneration team are working to deliver regeneration objectives for Caldicot and facilitate the allocation of Town Centre	No change required.

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		Improvement Grants providing financial support to property improvements in all of the County's town centres. Business rates are beyond the scope of the RLDP.	
3532 / Mr Nigel Haines / Objection	The government plans for growing the economy will have the opposite effect and will shrink it. Please consider this before building these houses.	Whilst Welsh Government's policy informs the Replacement Local Development Plan, the growth levels set out in Policy S1 are in response to Monmouthshire's local issues including the delivery of affordable homes, sustainable economic growth, and rebalancing our demography, whilst responding to the climate and nature emergency.	No change required.
3565 / Mrs Angela Sandles / Support	Much of our workforce currently travels outside of Monmouthshire to their employment, it's important that we also create employment opportunities within the county.	A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and 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.	No change required.
3614 / Dr Delyth / Comment	Disagrees that transport links are good overall, and improvements could support in-commuting and employment opportunities.	Monmouthshire is considered to be geographically well connected, located in a key strategic location that benefits from good transportation links to Cardiff, Bristol and the Midlands. However, the limitations of its public transport network are acknowledged, reflecting its rural nature. The RLDP incorporates a range of policies to help improve the transportation system, including Policy ST5 – Transport Schemes, which supports and safeguards transport schemes identified in the Local Transport Strategy (LTS). The LTS, which accompanies the RLDP, establishes a strategic framework for the development of the transport network in Monmouthshire. It identifies the key transport issues relevant to the County, the high-level interventions needed to address these and the specific priorities for Monmouthshire.  A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that	No change required.

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		<p>aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and 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>	
3758 / Mr Joseph Porter / Objection	<p>The plan is based on the creation of jobs locally, but these aren't the types of jobs everyone is after and there aren't enough to mean people who live in Monmouth can walk to work.</p>	<p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. The Replacement Local Development Plan (RLDP) provides the policy framework to support job growth in the county in a range of sectors including manufacturing and technology as well as foundational sectors such as tourism, leisure and the agricultural sector. It has a key role to play in 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 including in Monmouth. Housing and employment growth levels broadly align for Monmouth, which will assist in reducing the need to travel and travel to work distances.</p>	No change required.
3760 / Miss Julia Brown / Objection	<p>The existing problems need to be sorted first. These arguments 'for' further development is a tick box.</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</p>	No change required.

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		<p>meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p> <p>Supporting and enabling sustainable economic growth is a core Council and RLDP policy objective. 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 and also addresses existing employment provision in the County.</p>	
3828 / Mrs Sharon Gale / Objection	We are told the councils of Wales are in millions of pounds of debt, our roads are dangerously full of potholes, our high street has many empty buildings, where is the money for economic plans?	<p>The delivery of the RLDP's employment site allocations and jobs growth in other sectors, such as leisure and tourism, will be largely funded by private investment.</p> <p>With regards to town centres, the RLDP provides the policy framework to enable a vibrant mix of uses in the County's centres and the proposed mixed-use developments in the area will help to increase footfall in the town centres which may encourage further investment to boost the vitality, attractiveness and viability of the centres. In addition, the Council's Regeneration team are working to deliver town centre regeneration objectives and facilitate the allocation of Town Centre Improvement Grants providing financial support to property improvements in all of the County's town centres.</p> <p>Potholes are beyond the scope of the RLDP.</p>	No change required.
3828 / Mrs Sharon Gale / Objection	It's easy to say jobs will be created, much harder to do this when many companies are making redundancies, how is Monmouth suddenly going to buck this trend?	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. 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 growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County. It should also be noted that not all jobs will be in B use	No change required.

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		<p>classes. 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.</p> <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>	
3853 / Mrs Melanie Nicholas / Objection	Plenty of houses on sale around for Monmouthshire County Council to buy and refurbish.	Policy S10 relates to the provision of employment land. Detailed comments relating to the level of housing growth can be found in relation to Policy S1 – Growth Strategy.	No change required.
3873 / Mr V G Danks / Objection	Nice theory but this increase does not control the housing development rate – it has been deliberately disconnected thus will fail.	In accordance national planning policy, the RLDP is required to make provision for employment land requirements. 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).	No change required.
3886 / Mrs Nerys Wilson / Comment	Employment sites should be located outside conservation areas to avoid disrupting village's character or increasing traffic on narrow roads. Any local economic activity should minimise environmental impact and enhance community sustainability.	The Replacement Local Development Plan (RLDP) does not make any new employment allocations within a Conservation Area. Any allocations or proposals that adjoin a Conservation Area or are considered to be within their setting will be required to satisfy the requirements of Policy HE1 – Conservation Areas.	No change required.

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3895 / Ms Pamela Robinson / Objection	It would be good to see more employment sites within town centres.	The Replacement Local Development Plan (RLDP) provides the policy framework to consider a range of employment opportunities within town centres, provided the proposal is an acceptable use in that location and it does not impact on the vibrancy, vitality and attractiveness of the centre. Employment opportunities come in a range of sectors including commercial, leisure and hospitality which would be favourably considered in town centres.	No change required.
3909 / Mr Piers Jacobs / Objection	The Chepstow development will increase congestion with all the associated negative impacts on the local economy. How will this impact the employment sites provision? HA3 does not support the economic policies, there needs to be a more holistic approach with this Plan - the policies in isolation seem to support benefits but when reviewed together they don't support each other.	In accordance national planning policy, the RLDP is required to make provision for employment land requirements. On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the RLDP, and more specifically in Chepstow.  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 detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.  Detailed comments on the HA3 – Land at Mounton Road, Chepstow allocation are provided in relation to proposal in the relevant section of the report.	No change required.
3924 / Mr Richard Dobbin / Objection	Aspirations ok but other than making sites available what will MCC do to attract industry/employment as the transport links are congested as a result of too much house building.	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 and is a key mechanism for the Council's Economy, Employment and Skills Team to grow Monmouthshire's economy.  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 detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.	No change required.
3972 / Mrs Sue Young / Objection	S10 Thousands have already been spent on 'enhancing the experience for visitors' e.g. Church Road but the town consists mainly of cafes, takeaways, hairdressers and nail bars/beauty there needs to be a cap on the number of these and incentives for new	In accordance with national planning policy and reflecting the Adopted Local Development Plan, the Replacement Local Development Plan (RLDP) provides the policy framework to assess proposals for non-retail uses (A1 commercial uses) in the primary shopping area within Policy RC2 – Primary Shopping Frontages. This seeks to ensure that retail uses are maintained as the key focus for our town centres.	No change required.

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	<p>businesses, rates are very high. 16.1.5 Until jobs in Monmouthshire pay the same wages as Bristol/Cardiff there will high out-commuting from Monmouthshire. There needs to be a greater balance between wages and house prices. 16.2.5 Any plans to improve access to the M4 corridor? There are already a number of empty business premises and units in Caldicot.</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), which will help influence commuting patterns. The RLDP also 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 and is a key mechanism for the Council's Economy, Employment and Skills Team to grow Monmouthshire's economy.</p> <p>With regards to town centres, the Council's Regeneration team are working to deliver town centre regeneration objectives and facilitate the allocation of Town Centre Improvement Grants providing financial support to property improvements in all of the County's town centres. In addition, the proposed mixed-use developments in the area will help to increase footfall in the town centres which may encourage further investment to boost the vitality, attractiveness and viability of the centres.</p> <p>With regards to M4 improvement plans, the South-East Wales Transport Commission Final Recommendations Plan 2020 recommends a 'Network of Alternatives' to solve congestion and travel reliance on the M4 route. Within Monmouthshire, the report specifically recommends enhancement of the Severn Tunnel Junction railway station and access arrangements.</p>	



## Policy EA1 – Employment Allocations

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	List a number of provisions that are applicable to all individual development plots located within allocated employment sites.	The general provisions and site-specific requirements associated with the employment allocations will be considered as part of the progression of the Plan and the ongoing dialogue with the site promoters and as part of the planning application process.	No change required.
2031 / Peter Fox OBE MS Senedd Member for the Monmouth Constituency / Objection	Need new housing but this has to go hand in hand with sufficient employment opportunities and remain concerned that not enough has been done on this aspect of the RLDP.	<p>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 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 of 38ha whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p> <p>Reflecting the Council's ambitions for economic prosperity, the Replacement Local Development Plan (RLDP) provides the policy framework to support 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>	No change required.
2489 / Councillor Lisa Dymock / Objection	Many of the employment sites, including EA2 sites, are located near environmentally sensitive areas. Employment sites should prioritise brownfield areas. Must also incorporate renewable energy requirements. Advised during drop-in	In accordance with national planning policy, the Replacement Local Development Plan (RLDP) is required to make provision for employment land requirements. 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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>sessions that this could include incineration, which would be inappropriate.</p>	<p>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>Environmental considerations have been considered as part of the site selection process, with further detailed assessments to follow at the detailed planning application stage. The RLDP provides a robust policy framework to ensure environmental considerations are appropriately considered when assessing proposals for employment use with Policy NR1 – Nature Recovery and Geodiversity being of particular relevance.</p> <p>The allocation of greenfield sites for employment use is necessary given the limited number of brownfield opportunities in Monmouthshire. The RLDP does, however, encourage the continued use of existing employment sites by safeguarding them for such uses under Policy EA2 – Protected Employment Sites.</p> <p>Policy S4 – Climate Change, sets out the Council’s requirements in relation to addressing the causes of, and adoption to the impacts of climate change and applies to all development proposals, including employment uses. This includes the incorporation of renewable energy generation and energy efficiency construction methods to minimise the demand for energy.</p> <p>With regards to potential waste uses on some employment allocations, 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.</p> <p>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</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies.</p> <p>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.</p>	
2505 / Councillor Steven Garratt / Support	Monmouthshire needs to encourage SMEs to move here or expand. The policy will offer existing businesses room to grow and new businesses a launchpad.	<p>Reflecting the Council's ambitions for economic prosperity, the Replacement Local Development Plan (RLDP) provides the policy framework to support/enable sustainable job growth in the County for both large companies and SMEs. The Council's Economy, Employment and Skills Strategy (EESS) sets the Council's direction of travel and action plan for delivering job growth. This recognises the role that SMEs make to the County's economy and an aim to facilitate further growth in such businesses.</p> <p>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. The EESS provides details of employment statistics as well as case study evidence of recent economic successes in Monmouthshire and can be viewed on the Council's website. Further evidence on employment provision can be found in the RLDP's Employment Land Review (Noc 2022).</p>	No change required.
1056 / Abergavenny Town Council / Support	Support the expansion of allocations in Abergavenny which are essential for the creation of new job opportunities, particularly for the younger demographic.	Support welcomed.	No change required.
1367 / Abergavenny and District Civic	Paragraph 16.3.1 should refer to Policy S10 not S12.	Comments noted. Reference to Policy S12 in paragraph 16.3.1 is a drafting error and will be amended to Policy S10.	Amend reference to in paragraph 16.3.1 to read Policy S10.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Society / Comment			
3562 / Gateway to Wales Action Group / Support	Support the principles of the Policy EA1 and inclusion of EA1b and EA1c.	Support welcomed.	No change required.
1663 / Richborough / Comment	Refer to EA1 allocating 5.09ha of B1 uses on industrial and business sites together with a further 3ha of land on mixed use allocations and 40ha of either Class B1, B2 or B8. State that should a level of B1 space be taken forward it is important that there is sufficient flexibility for development proposals to respond to market conditions and demands over the plan period. State this is particularly pertinent where minimum levels of Class B1 use are identified for the strategic mixed-use allocations.	Comments noted. Proposals put forward will be assessed against the policy framework set out in the RLDP and any material considerations that are relevant to the scheme under consideration. 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 and therefore involves a range of options and degree of flexibility.	No change required.
1410 / Mr Kevin Hall / Objection	Concern for lack of employment opportunities in the future. Planning should approve unused buildings being brought back into use.	<p>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>In addition, the Replacement Local Development Plan (RLDP) provides the policy framework to facilitate proposals in a range of sectors, including foundational sectors such as tourism, food and retail, to support and enable sustainable economic growth and consider proposals that involve the re-use of vacant buildings.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1653 / John Bromley / Comment	<p>Refers to Raglan being ideal for distribution and service centres but notes it has a previously thriving commercial estate with direct access to the Raglan roundabout already. There is also a larger similar estate allocated to Raglan, but it is quite large and therefore seriously question MCC putting forward another much smaller site on their own land with an inferior road access. Disapprove of solar panels on good farmland, with plenty of marginal land and commercial roofing for solar panels available.</p>	<p>It is agreed that Raglan is an appropriate location for employment and industrial uses given its proximity to the A40 and the A449, linking it up with the rest of the County and further afield. Existing industrial estates in and around Raglan are protected for continued employment use under Policy EA2 – Protected Employment Sites. The main aim being to retain such sites in employment use to ensure a range and choice of options are available in the County and to resist alternative non-industrial uses.</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 that allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations.</p> <p>The ELR also considers the appropriateness of retaining existing employment sites and the potential of the candidate sites put forward for employment to be allocated for such use and concludes that the existing Raglan Enterprise Site should be retained as an employment allocation, and that its expansion through candidate site submission CS0069 had potential to meet the needs of small units in the County. Similarly, the ELR concludes that the candidate site submission associated with Land to the West of Raglan (EA1j), would be suitable for employment uses, representing an option for accommodating excess demand from Abergavenny and Monmouth, subject to detailed master planning and demand evidence.</p> <p>With regards to the renewable energy allocation made under policy CC2, 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</p>	No change required.

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		<p>allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives.</p> <p>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. 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 how this is justified. Welsh Government note that 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.</p> <p>The Council is supportive of roof mounted solar panels, subject to detailed design considerations.</p>	
1939 / Mr Matthew Hayes / Objection	Development proposed for Raglan disproportionate to the size of the village. The industrial development is completely out of place in this rural area. It would detract from the historic setting of the village which with its castle is an important tourist asset for the county.	<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). It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this 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> <p>The RLDP proposes two new employment allocations in Raglan, EA1i – Raglan Enterprise Park and EA1j – Land West of Raglan. The Employment Land Review (Nov 2022) considers the appropriateness of retaining existing employment sites and the potential of the candidate sites put forward for employment to be allocated for such use and concludes that the existing Raglan Enterprise Site should be retained as an employment allocation, and that its expansion through candidate site submission CS0069 had potential to meet the needs of small units in the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>County. Similarly, the ELR concludes that the candidate site submission associated with Land to the West of Raglan (EA1j), would be suitable for employment uses, representing an option for accommodating excess demand from Abergavenny and Monmouth, subject to detailed master planning and demand evidence.</p> <p>Neither allocation, either individually or cumulatively, has raised an objection from the Council's Heritage Team. In both cases, the views and vistas to and from Raglan Castle are not considered to be detrimentally impacted upon, with the integrity of the Conservation Area and setting of the Castle maintained. Similarly, CADW has not raised any objections to the allocations. Careful consideration will, however, be given to the integration of green infrastructure and placemaking principles at the detailed planning application stage.</p>	
2060 / Dr Christopher Heneghan / Objection	I object to the development of so few employment sites for Abergavenny: they should at least equal what is proposed for other towns and even exceed elsewhere as Abergavenny has lost a good deal of employment over recent years.	The limited level of employment allocations made in Abergavenny is recognised but 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 sustainable economic growth in Abergavenny, including proposals in foundational sectors, such as tourism, food and retail, which play an important role in the local economy.	No change required.
3150 / Hilary and David Phillips / Support	To enhance space and facilities at Newhouse is a great proposal and will hopefully provide more job opportunities in the locality.	Support for the allocation at Newhouse Industrial Estate, Chepstow (EA1d) is welcomed.	No change required.
3322 / Miss Angela / Objection	The proposed employment site allocations seem poorly located and fail to take into account the area's existing infrastructure limitations. The proposed sites are not well-served by public transport, making them less accessible and potentially	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. Similarly, reducing levels of out-commuting is a key objective of the Plan. To address these the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>increasing traffic congestion on already strained roads. Furthermore, without significant improvements to transport links and road networks, the proposed employment sites could place undue pressure on the local infrastructure, creating further gridlock and negatively impacting the quality of life for residents.</p>	<p>the policy framework to support/enable economic prosperity and 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>On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the Replacement Local Development Plan (RLDP), with the majority of both directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area). This reflects the findings of the Sustainable Settlement Appraisal and directs employment growth to the County's most sustainable locations.</p> <p>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 detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	
3323 / Mrs Angela Harries / Objection	<p>We already have sufficient empty employment premises so don't understand why there is a need for more. Please publicise the research proving the need for such a development.</p>	<p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements and an Employment Land Review (Nov 2022) was undertaken as evidence to inform these requirements and site allocations. 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>Further details on the background evidence to the employment requirement figure can be viewed in the Employment Land Review (Nov 2022).</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3339 / Mrs Charlotte James / Objection	I don't think there is a need for additional employment site allocations as current offerings are empty. Surely these should be occupied first?	<p>In accordance with national planning policy, the Replacement Local Development Plan is required to make provision for employment land requirements. 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>In some instances, undeveloped existing employment allocations identified in the Adopted Local Development Plan have been rolled forward as employment allocations in the RLDP. With regards to vacancy rates of existing employment units, the Employment Land Review indicates that vacancy rates are low in settlements such as Raglan, Magor and Monmouth and limited vacancies are available in Abergavenny and Usk. Caldicot and Chepstow do, however, have some vacancies. Therefore, given the relatively low overall vacancy rates and given the large geographical size of Monmouthshire, a range of sites are required across the County. This approach appropriately reflects a core objective of the RLDP to support and enable sustainable economic growth in the County.</p>	No change required.
3340 / Mrs Cheryl Cummings / Support	Sites chosen for Monmouth suitable.	Support for the Monmouth employment allocations is welcomed.	No change required.
3377 / Mrs Edmunds / Objection	Not enough employment.	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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.	
3378 / Mrs Elizabeth Parnell / Comment	Jobs that pay min wage would be good.	The Replacement Local Development Plan (RLDP) provides the planning policy framework to support sustainable job growth in the County, and sits alongside the Council's Economy, Employment and Skills Strategy (EESS), which sets the Council's direction of travel and action plan for delivering job growth. This aims to deliver economic growth in the County in a range of sectors, including those that provide well paid jobs.	No change required.
3390 / Mr Craig / Objection	The category of industry proposed does not reflect the needs of the area.	Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. The Replacement Local Development Plan (RLDP) provides the policy framework to support 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 including tourism, agriculture and hospitality, to identifying sufficient employment/industrial land.	No change required.
3436 / Mr Christopher Banner / Support	Jobs for all.	Reflecting the Council's ambitions for economic prosperity, the Replacement Local Development Plan (RLDP) provides the policy framework to support 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 including tourism, agricultural and hospitality, to identifying sufficient employment/industrial land.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3444 / Mr Graham Parker / Objection	More small business and localised sites should be available for local communities.	<p>The Replacement Local Development Plan (RLDP) provides the policy framework to support job growth in the County, and sits alongside the Council's Economy, Employment and Skills Strategy (EESS), which sets the Council's direction of travel and action plan for delivering job growth. This recognises the role that small businesses make to the County's economy and includes an aim to facilitate further growth of such businesses.</p> <p>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>	No change required.
3469 / Mr Andrew Orrell / Objection	There are no jobs here - build where there are jobs.	<p>The Replacement Local Development Plan (RLDP) proposes a policy-on approach to housing and jobs growth and in accordance with Welsh Government policy, encourages the adoption of a long term and positive economic strategy consistent with the economic ambitions of the Council and Cardiff Capital Region (CCR). In this respect, the RLDP seeks to provide the policy framework to support a sustainable level of growth, in terms of homes and jobs to address the County's key issues including the delivery of affordable homes, enabling economic prosperity and rebalancing the County's demography. The proposed level of growth seeks to reduce the need to travel and travel to work distances which will assist in addressing our challenges in relation to the climate and nature emergency</p> <p>The RLDP 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>Therefore, the provision of a positive planning policy framework to facilitate sustainable jobs growth is a key aim on the Plan and necessary to sustain Monmouthshire's economy.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3493 / Mrs Julie Carr / Objection	Priority for local people not commuters.	The allocation of jobs to local people is beyond the scope of the Replacement Local Development Plan (RLDP). However, it aims to provide a range and choice of sites and the policy framework to facilitate sustainable jobs growth in Monmouthshire, which in turn will increase employment opportunities for the local community.	No change required.
3496 / Mr John Valentine / Objection	What type of businesses will be attracted to the site? How many job opportunities will be generated for the local community? This needs to be publicised before implementation	As no site reference is given it is unclear which site the comments relate to, and it is, therefore, not possible to provide a response.	No change required.
3522 / Mrs Mary Auton / Objection	Inadequate for proposed housing developments.	<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).</p> <p>In accordance with national planning policy, an Employment Land Review (Nov 2022) was undertaken as evidence to inform the County's employment land requirements and site allocations. 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 that allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The proposed level of employment provision is therefore considered to be appropriate.</p>	No change required.
3550 / Mrs Amanda Graham / Objection	Magor and Undy is well served for employment. No more units needed to bring traffic here!	<p>No new allocations in addition to those already included in the Adopted Local Development Plan are identified for employment use in the Replacement Local Development Plan for the Magor and Undy area. The continued allocation of EA1f – Quay Point, EA1g – Rockfield Farm, and EA1h – Gwent Euro Park are, however, considered appropriate given their strategic location in close proximity to the M4 corridor. It is also necessary to provide a range and choice of employment sites throughout the County, including the south.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.	
3565 / Mrs Angela Sandles / Support	We need more housing in Monmouthshire, to attract younger people to be employed in the many sectors, including Social Care, health and education.	Comments noted. The rebalancing of the County's demography is a key aim of the Replacement Local Development Plan (RLDP). The RLDP proposes a growth level that begins to address the unbalanced and ageing demographic with an increase in younger and working age groups and provides opportunities for younger people to both live and work in the County through the delivery of affordable homes and sustainable economic growth. This in turn will help provide the population to work in the sectors noted.	No change required.
3603 / Mr Darren / Objection	This will not bring employment to Wales, just an influx of people travelling to England to work. Bristol, causing more traffic issues.	<p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements. 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>The Replacement Local Development Plan (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. The proposed level of growth seeks to reduce the need to travel and travel to work distances which will assist in addressing our challenges in relation to the climate and nature emergency.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3702 / Keith Plow / Support	Keep them convenient to the workforce.	Comments noted. 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). This alignment will provide the potential for the co-location of the workforce and jobs provision.	No change required.
3749 / Ms Jill Cantor / Objection	We do not need poultry units on the edge of the town to provide employment. The distress caused to locals (and chickens) far outlays any benefit.	Allocation EA1b allocates land for employment use (use class B1) at the poultry units in Monmouth, rather than allocating the land for poultry units themselves.	No change required.
3763 / Natalie Sandercock / Objection	Employment allocations are not supported by Welsh Government.	Welsh Government has not raised any objections to level of employment provision or associated employment allocations. The Plan's approach to identifying employment land requirements and site allocations reflects national planning policy.	No change required.
3853 / Mrs Melanie Nicholas / Objection	Not on such a dangerous road.	It is unclear which road the comments relate to, and it is, therefore, not possible to provide a response.	No change required.
3867 / Mr /Mrs White / Objection	What employment and for whom? Why is it that large numbers choose to work in Bristol?	<p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements. 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>In addition to providing a range of sites, the RLDP provides a supportive planning policy framework to facilitate economic growth in a range of sectors including tourism, retail, hospitality and agricultural. The proposed level of growth aims to provide a balance of housing and employment growth, to avoid being reliant on</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		unjustified levels of in-commuting or out-commuting. The proposed level of growth seeks to reduce the need to travel and travel to work distances, which will assist in addressing our challenges in relation to the climate and nature emergency and contribute towards a more balanced demographic profile in Monmouthshire.	
3873 / Mr V G Danks / Objection	Nice theory but this increase does not control the housing development rate – it has been deliberately disconnected thus will fail.	In accordance with national planning policy, the RLDP is required to make provision for employment land requirements. 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). Supporting and enabling sustainable economic growth is a core issue that the RLDP seeks to address.	No change required.
3886 / Mrs Nerys Wilson / Comment	Employment sites should focus on areas with existing infrastructure to support commercial activity avoiding new development that could disrupt conservation areas.	<p>In accordance with the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, the majority of housing and employment are directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area).</p> <p>The Replacement Local Development Plan (RLDP) does not include any new employment allocations within a Conservation Area. Any allocations or proposals that adjoin a Conservation Area, or are considered to be within their setting, will be required to satisfy the requirements of Policy HE1 – Conservation Areas.</p>	No change required.
3933 / Mr Robert Maidment-Wilson / Objection	Employment sites should only ever be permitted on brownfield sites. Any development of whatever kind on greenfield sites causes excess runoff and flooding downstream.	<p>In accordance with national planning policy, the RLDP is required to make provision for employment land requirements. The allocation of greenfield sites, is therefore, necessary given the limited number of brownfield opportunities in Monmouthshire. The RLDP does, however, encourage the continued use of existing employment sites by safeguarding them for such uses under Policy EA2 – Protected Employment Sites.</p> <p>Policy CC1 seeks to ensure that the use of sustainable drainage systems (SuDs) is an integral part of a development from the outset to reduce surface water run-off and minimise its contribution to flood risk elsewhere.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		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 established by Welsh Government. These are administered by the Sustainable drainage systems (SuDs) Approving Body (SAB), who are a consultee on all planning applications to ensure the two processes are considered in combination, including consideration on permeable surfaces in new developments.	
3960 / Ms Sophie / Objection	We have plenty of available spaces sat empty because the landlords want to overcharge. This needs to be dealt with and occupied before planning on building any further spaces. Would it be possible to charge a higher rate of tax to an empty property over 3 months if the landlord is not actively seeking and making affordable the available the spaces.	With regards to vacancy rates of existing employment units, the Employment Land Review (Nov 2022) indicates that vacancy rates are low in settlements such as Raglan, Magor and Monmouth and limited vacancies are available in Abergavenny and Usk. Caldicot and Chepstow do, however, have some vacancies. Therefore, given the relatively low overall vacancy rates and the findings of the Employment Land Review, a range of employment sites are required across the County.  Tax rates associated with vacant premises is beyond the scope of the Replacement Local Development Plan (RLDP).	No change required.
3989 / Miss Tracey Meaker / Objection	What employment?	Supporting and enabling sustainable economic growth is a core objective of the RLDP. 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.	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		In addition to providing a range of sites, the Replacement Local Development Plan provides a supportive planning policy framework to facilitate sustainable economic growth in a range of sectors including tourism, retail, hospitality and agricultural.	

## Policy EA1a – Land at Nantgavenny Business Park, Abergavenny

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. The site is crossed by a 300mm diameter foul sewer and a 305mm diameter surface water sewer. Site is in the catchment area of Llanfoist WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
3414 / Neil Niblett - Petition / Objection	Signed (14) petition - The site is totally unacceptable for any form of development. Need - why is the council impacting an area of greenfield and not regenerating former brownfield locations? Why is the council not using this land for more environmental uses? Is there a need for further industrial units? Are these units serving Mardy or the wider area? Impact - Mardy is a small residential village. Do further industrial units fit well with the village community? What is the impact on services infrastructure such as storm/foul water drainage, electricity and telecoms bandwidth in the area? Any development will impact on the flood plain. Potential pollution of the Gavenny river. Noise pollution will impact neighbours quality of life. Loss of view. Lack of privacy to the gardens of the existing houses and security of residents. There is a risk of ground disturbance and subsidence. Will the council give out written guarantees regarding this risk? What will be the impact on wildlife? There is already concerns for loss of wildlife habitats along the Gavenny	<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 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.</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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>corridor. Highways - the lane is too narrow and there is no footpath. It has a severe gradient which causes noise and pollution from HGVs. Already congestion in the lane which causes traffic issues. The junction at Hereford Road is too narrow to allow cars to pass. Delivery lorries cause issues with visibility, manoeuvring and road safety.</p>	<p>that fall within A2), research and development of products and processes and light industry appropriate in a residential area.</p> <p>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.</p> <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 whilst also providing additional homes and enabling economic growth.</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>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>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</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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>With regards to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals in terms of amenity issues including air pollution, light pollution and noise pollution.</p>	
2046 / Mr Mark / Objection	Concerns re capacity of the sewerage system due to recent flooding of the sewers downstream of the proposed site allocation. Further development would require major sewer system capacity upgrades. Increase in surface water run-off from recent development into the river Gavenny causing increased frequency and impact from flooding downstream.	<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 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.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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>The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP, with no objections raised to the proposed allocation. Dialogue will continue as the plan progresses through the plan process.</p>	
3786 / Ms Kerry Mudd / Objection	<p>There is already a traffic issue into this road. It is virtually impossible to turn into this road when a vehicle is exiting. Consideration needs to be given to entry/exit of this road which is only going to get worse if the volume of traffic increases.</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 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.</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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		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.	
3923 / Mr. Richard Davies / Objection	The objection is not to the site itself, but the fact that any development will introduce further traffic to Nantgavenny Lane. It is a lane, not a road and cannot deal with the amount of traffic that has been introduced by the business park, the Morrisons local, Q-Care offices. The lane is not wide enough for 2 cars to pass as parking is required for residents and there is no scope to widen it. The junction at Hereford Road is not fit for purpose as 2 cars cannot pass at the junction. The lane is subject to HGV traffic and it is often gridlocked. The parking for the shop is poor design. There is a popular walking route in a nearby woodland area and traffic is causing issues for these users as there are limited footpaths. MCC should look into options to reduce traffic on a lane not fit for purpose.	<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 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.</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>	No change required.
3948 / Miss Sarah Lewis / Objection	Not objecting to the land but objecting to the road access to the development	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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>because of the capacity and safety of the existing lane access. The lane is currently heavily used, and the junction cannot accommodate additional traffic. The development will cause further congestion, road blocking and potentially traffic safety issues. The access is narrow and lacks adequate pedestrian/cyclist facilities. There is insufficient parking for the Morrisons shop. This makes emergency service access difficult. The infrastructure is not equipped to handle the increase in traffic. This needs to be addressed.</p>	<p>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 employment use for allocation for such 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.</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>	

## Policy EA1b – Poultry Units, Rockfield Road, Monmouth

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Monmouth WwTW. Add that the comments do not assess capacity.	Comment noted. The Council will continue to work with Dŵr Cymru Welsh Water throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1503 / Redrow Homes (South Wales) Limited / Support	Endorse the employment allocations EA1b and EA1c noting these are vital to ensuring that residents have access to employment opportunities in Monmouth. Refer to EA1c being the only employment allocation for industrial uses and note it is essential this is included in the final version of the Plan given the identified lack of availability of this type of employment space in Monmouth.	Support welcomed.	No change required.
1506 / Morspan Pension Scheme / Support	Welcome and support the inclusion of the Former Poultry Units being included as an employment allocation in the Deposit RLDP. Note this site represents a deliverable and viable employment allocation, which can support the local authority in achieving the required level of employment growth over the plan period. Provide detail of the site including recognition that the site is brownfield, in a highly sustainable location and is viable.	Support welcomed.	No change required.
1506 / Morspan Pension Scheme / Comment	Note that industrial and business site designations within the RLDP do not allow for uses outside the B1 use class to be included within the allocation. Identify that the site could support an element of D1 use, request the site maintains a	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	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>wider/more flexible designation allowing for a mix of B1/D1 that would remain viable and present a preferable option in terms of making the most efficient uses of the site. Reiterate the site remains viable as B1 only without D1 uses.</p>	<p>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>	

## Policy EA1c – Land North of Wonastow Road, Monmouth

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Monmouth WwTW. Add that the comments do not assess capacity.	Comment noted. The Council will continue to work with Dŵr Cymru Welsh Water throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1503 / Redrow Homes (South Wales) Limited / Support	Endorse the employment allocations EA1b and EA1c noting these are vital to ensuring that residents have access to employment opportunities in Monmouth. Refer to EA1c being the only employment allocation for industrial uses and note it is essential this is included in the final version of the Plan given the identified lack of availability of this type of employment space in Monmouth.	Support welcomed.	No change required.
1663 / Richborough / Support	Support EA1c for the allocation of 4.5ha of Class B1, B2 and B8 use.	Support welcomed.	No change required.
3780 / South Wales Land Developments Ltd / Support	Support the principle of Policy EA1c in respect of the continuation of the allocation of 4.5 hectares of land as an industrial and business site for B1, B2 and B8 uses.	Support welcomed.	No change required.
3780 / South Wales Land Developments Ltd / Objection	EA1c in overall planning terms and in terms of site-specific context is a location where a care home, as an example, could be developed in response to market demand, that would deliver significant employment. Aware of proposals by Richborough Estates for the expansion of land to the north of Wonastow Road that would provide for	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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	residential and community uses as well as delivering on the 4.5ha allocation of employment. We support in principle this proposal.	<p>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>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.</p>	
3845 / Mr Martin Sweeney / Objection	EA1c should also be considered for housing, as originally proposed. This has been discounted in the RLDP on the basis of suitable land elsewhere in the settlement of Monmouth. Site HA4 is unsuitable for a number of reasons.	<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. 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 EA1c for B1, B2 and B8 uses.</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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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>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> <p>Detailed comments on HA4 are provided in the relevant section of the Report.</p>	

## Policy EA1d – Newhouse Industrial Estate, Chepstow

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Nash WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1803 / Councillor Dr Louise Brown / Objection	EA1d- Land at New House Farm Industrial Estate Chepstow  This area of land used to be within the Mathern community council area but with the boundary changes is no longer. However, there is a mound between the Industrial Estate and the Mathern area and there is a need to ensure that any developments in terms of lighting and pollution do not impact the residential area of the village of Mathern. This needs to be considered in relation to any development in this area particularly as the area of land is said to be expanding.	Comments noted. The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and amenity is fully considered when assessing proposed development at planning application stage. 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.	No change required.
3910 / Mrs Quinlan / Support	There is opportunity here for the right kind of employment opportunities, which do not cause constant coming and going of traffic. For example, it is rumoured that McDonalds want to put a "drive-through" facility there, which would not be a sustainable option from a road use point of view. However, there are no doubt more sensible and better economic opportunities to be found.	Support for employment uses on the site noted and welcomed. In terms of drive thru facility at the site there has been a planning application DM/2022/01155 - Hybrid – outline/full permission for B2/B8 (speculative) - 9,043 sqm on western half of site. Petrol station, drive thru restaurant and coffee drive thru on eastern half which was approved 31.05.2024. For further information in relation to the decision for the drive thru approval on the site please see the planning report for DM/2022/0155 on the Council's website.	No change required.

## Policy EA1e – Land adjoining Oak Grove Farm, Caldicot

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	The site is crossed by a 2" diameter watermain and a 2" diameter abandoned watermain. There are no public sewers near the site. Add that the comments do not assess capacity.	Comment noted. The Council will continue to work with Dŵr Cymru Welsh Water throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Allocation for employment at Oak Grove Farm is too small especially with the site being so divorced from the existing cluster of businesses on employment land south of HA2 - employment land would be better located on land comprising the southern area of the proposed allocation which has better relationship to existing employment facilities. In addition there is potential for an increased area of employment uses in an area where the business park is already thriving.	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.  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.	No change required.
1646 / Mr Brian Williams / Objection	I don't think Site EA1e already has mains drainage? It appears to be in the SPZ, so presumably this would need to be installed?	Comment noted, Dŵr Cymru Welsh Water (DCWW) note that there are no public sewers near the site. This would need to be resolved by any future developer at the planning application stage in consultation with DCWW.  The site is located 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.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3543 / Mr Paul Dalton / Objection	Unclear whether industrial development is proposed for EA1e.	<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 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.</p> <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). Use Class B2 relates to general industry and Use Class B8 to storage or distribution. 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>	No change required.

## Policy EA1f – Quay Point, Magor

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	The site is crossed by a 450mm diameter raw watermain. The site is crossed by a 10" diameter pressurised rising main sewer. Site is in the catchment area of Nash WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1677 / Councillor Frances Taylor / Objection	There is little regard paid to the Gwent Levels and to the Magor and Llandeenny SSSI. Siting of employment allocations in this location is contrary to PPW. The allocation presents unacceptable environmental damage to the SSSI due to the risks posed to the drainage system and water quality of the Gwent Levels. There is also a potential impact on the ancient settlement of Llandeenny and the landscape character of the Gwent Levels.	<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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately size</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under Policy S5 – Green Infrastructure, Landscape Nature Recovery, LC1 Landscape Character and NR1 Nature Recovery and Geodiversity. 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.</p>	
3059 / Magor with Undy Town Council / Objection	Allocation adjacent to SSSI in direct conflict with the PPW12 6.4.25 which states that development in or adjacent to a SSSI which is not necessary for the management of the site must be avoided. Proposed allocation not necessary - particularly the waste classification.	<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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under Policy S5 – Green Infrastructure, Landscape Nature Recovery, LC1 Landscape Character and NR1 Nature Recovery and Geodiversity.</p> <p>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.</p> <p>With regards to reference to the waste classification 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.</p>	
1588 / AB INBev UK Limited / Support	Continued allocation of the Quay Point site would enable to Brewery or other supporting uses to come forward at the appropriate time to further increase the Brewery's manufacturing capacity and efficiency.	Comments noted.	No change required.
1779 / Mrs Sandra Lloyd / Objection	Point F - Quay Point, Magor adjacent to SSSI with stringent requirements in PPW12. Point H - Gwent Euro Park, Magor is on SSSI and protected from development in PPW12 and credibility of planning permission is arguable and has been extended due to changes of use class over time.	<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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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</p>	No change required.

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		<p>of strategic importance to ensure the support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under Policy S5 – Green Infrastructure, Landscape Nature Recovery, LC1 Landscape Character and NR1 Nature Recovery and Geodiversity.</p> <p>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.</p>	
2660 / Mr Wayne Humphries / Objection	<p>Concerns over standard of living and health. Negative effects on access for their property. Increased light and noise pollution as previous screening of INBEV development was inadequate, would this be addressed by future developments?</p> <p>Concerns re dust and noise from construction of development. Concerns re</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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b in the current adopted LDP. Although it is</p>	No change required.

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	<p>drainage and surface water effects by future proposals as already affected by previous developments. Concerns re affects on value of their property due to proposals. Concerns re impact on wildlife and biodiversity and impact on family pets.</p>	<p>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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>Cadw have provided comments as part of the Candidate Assessment Process and do not object to the allocation's impact on the SAM Wilcrick Hill. They comment that the 'Candidate site is located some 200m south-south-east of scheduled monument MM127 Wilcrick Hill Camp and will be visible from it: However, in this view it will be seen along with the buildings of Magor Brewery, Three Gates and Upper Cottage. As such, any impact on the setting of scheduled monument MM127 Wilcrick Hill Camp will not be significant and this can be reduced by careful design of the development.'</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under 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</p>	

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		<p>development has an acceptable impact upon environmental considerations. There will also be full consultation with other regulatory bodies of the environment, such as NRW and CADW.</p> <p>With regard to residential amenity concerns, 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, this will be part of the planning application stage.</p> <p>In terms of flooding impact, the site is outside flood risk zones, although a small area of surface water flooding on western edge of the site has been identified within the Strategica Flood Consequence Assessment (this is less than 1%). Surface water run-off from development and 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>	
3345 / Anthony Pickup / Objection	<p>Development of these sites poses immediate ecological conservation and landscape threats as well as long-term threats to dealing with climate change. S4 - Industrial development on natural or semi-natural land habitats should only be permitted under extreme circumstances and only if remediation greatly exceeds the losses caused by the development. Development on land that presents significant threats to Sites of Special Scientific Interest should not be undertaken. These are in conflict with this. Designating almost a half of its economic development area on carbon-sink land is unacceptable. S5; CC1; NR1 and NR3 - On</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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point would be suitable for</p>	No change required.

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	<p>an ecological level, the industrial development presents unacceptable environmental hazard to the Llandeenny and Redwick SSSIs due to the risks posed to the drainage system of the Gwent Levels. The run off poses a serious risk to the water quality of the Gwent Levels. The toxicity from contaminants concern. Impact on the reens and on flora/fauna. There are carbon sink implications. LC1 - On a social level, these two developments will have a significant adverse effect on the tiny community of Llandeenny which they surround. S4 - All industrial development approval should be conditional on the provision of as much on-site renewable energy generation as possible. To this end it should be a planning condition that the roofs of all new development be designed to support solar panels, unless the roof design needs to allow natural lighting to the work area below that would militate against panels. Fabric-roofing must be banned.</p>	<p>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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under 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 full consultation with other regulatory bodies of the environment, such as NRW. Energy renewables requirements for the design of proposed development is set out in RLDP policies S4 – Climate Change and S3- Sustainable Placemaking and High Quality Design, which will be considered as part of the planning application process for a proposal.</p>	
3492 / Claire Richards / Objection	<p>Quay Point, Magor is adjacent to SSSI and has stringent requirements in PPW.</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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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</p>	<p>No change required.</p>

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		<p>of strategic importance to ensure the support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under 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 full consultation with other regulatory bodies of the environment, such as NRW.</p>	
3713 / Mark Petersen / Objection	The proposal would change the historical landscape of the area and the use of B2 in this area does not accord with policy LC1 on protection of historical landscape value. The site is on land that is elevated therefore any development would rise up	In accordance with national planning policy, the RLDP is required to make provision for employment land requirements for the Plan period up to 2033; to support to support job growth in the County and this also 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.	No change required.

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	<p>above the hamlet impacting on the neighbouring properties in respect of visual, noise and light pollution; having a detrimental impact on residents and local, established wildlife species. Concern re increased flooding caused by run off, potential access issues to the hamlet of Llandeenny with flooding and landslides affecting the access road, pollution of the protected reens of the Gwent Levels and the lack of an alternative safe route to Magor. Development would be in contravention of para 6.4.25 which sets out that development in SSSI which is not necessary for the management of the SSSI must be avoided. The proposed development would affect the character and setting of the protected monument (Wilcrick Hill) which would be against national planning policy for Wales.</p>	<p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p> <p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>Cadw have provided comments as part of the Candidate Assessment Process and do not object to the allocation's impact on the SAM Wilcrick Hill. They comment that the 'Candidate site is located some 200m south-south-east of scheduled monument MM127 Wilcrick Hill Camp and will be visible from it: However, in this view it will be seen along with the buildings of Magor Brewery, Three Gates and Upper Cottage. As such, any impact on the setting of scheduled monument MM127 Wilcrick Hill Camp will not be significant and this can be reduced by careful design of the development.'</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under 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.</p>	



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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 full consultation with other regulatory bodies of the environment, such as NRW and CADW.</p> <p>With regard to residential amenity concerns, 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, this will be part of the planning application stage.</p> <p>In terms of flooding impact, the site is outside flood risk zones, although a small area of surface water flooding on western edge of the site has been identified within the Strategica Flood Consequence Assessment (this is less than 1%). Surface water run-off from development and 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>	
3817 / Tyrone Broome / Objection	Concerns site encompasses one of two accesses to Llandevenny and would significantly affect residents wellbeing, health and access to local services and facilities being it's only safe link to Magor for pedestrians. Concerns development will have adverse impact on landscape, historic landscape, flooding and pollution of SSSI, natural environment, wildlife, and dark skies due to increase in light pollution. Concerns re lack of consideration given to impacts on Llandevenny by developments.	<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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1b 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 support for employment growth and economic benefit in the county, which as 14ha is a significant proportion of the employment provision set out in Policy S10 and EA1.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required within the Plan's growth strategy and the sites to allocate, and this indicated that land at Quay Point 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/industry.</p> <p>In terms of considering 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, which has been reviewed by MCC ecologist's, who consider the site is suitable for allocation with appropriate mitigation and compensation, this includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately sized buffer area at southern section of site to limit impacts on SSSI Full details of which will be required at the planning application stage.</p> <p>Cadw have provided comments as part of the Candidate Assessment Process and do not object to the allocation's impact on the SAM Wilcrick Hill. They comment that the 'Candidate site is located some 200m south-south-east of scheduled monument MM127 Wilcrick Hill Camp and will be visible from it: However, in this view it will be seen along with the buildings of Magor Brewery, Three Gates and Upper Cottage. As such, any impact on the setting of scheduled monument MM127 Wilcrick Hill Camp will not be significant and this can be reduced by careful design of the development.'</p> <p>The RLDP provides the supportive planning policy framework to ensure the impact upon the environment and landscape is fully considered when assessing proposed development at planning application stage, under 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 full consultation with other regulatory bodies of the environment, such as NRW and CADW.</p> <p>With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>amenity issues including air pollution, light pollution and noise pollution, this will be part of the planning application stage.</p> <p>In terms of flooding impact, the site is outside flood risk zones, although a small area of surface water flooding on western edge of the site has been identified within the Strategic Flood Consequence Assessment (this is less than 1%). Surface water run-off from development and 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>	

## Policy EA1g – Rockfield Farm, Undy

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Nash WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.

## Policy EA1h – Gwent Euro Park, Magor

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Nash WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1412 / Natural Resource Wales (NRW) / Comment	No further details are provided regarding the extant planning permission. Our View is that the site should undergo a thorough assessment to understand whether they are suitable for inclusion in the Plan. If the extant planning permission has been implemented this too is relevant.	<p>The site has a current allocation (SAE1c) in the existing LDP. There is a current planning application DM/2025/00852 to bring this allocation forward and due to the extant permission at the site it was considered justified on this basis to re-allocate the site within the RLDP. Planning permission was agreed to have been implemented (and therefore extant) by MCC Officers in August 2008 – the planning history is set out below:</p> <p>Outline planning permission for the MCC part of the overall site was granted in March 1995 under ref: A35349. This consent was subsequently renewed twice to extend the time for the submission of reserved matters by virtue of planning permissions granted in April 2000 under ref: M/4002 and in June 2003 under ref: M/8467. The operational outline planning permission is therefore M/8467. A reserved matters application was subsequently granted planning permission on 19/09/2007 relating to the site for a B8 distribution facility with associated two storey offices (63,000 sq.m. B8 use with 4,300 sq.m. B1 floorspace), single storey gatehouse and vehicle maintenance unit (VMU) (ref: DC/2007/00835). All pre-commencement conditions regarding that site were discharged and a meaningful commencement of that development was accepted by MCC officers in writing in August 2008. On the 2/9/2020 planning permission was granted for a Section 73 application for the variation of condition 9 of M/8467 to allow for primary B2 and B1 uses as well as the previously B8 (DM/2018/0282). Thus, the site benefits from an extant planning permission for a B8, B2 and B1 development.</p> <p>Moreover, immediately adjacent land which lies within Newport Council Local Planning Authority and which forms part of the extant planning permission, is currently being developed for employment use. Given the site's strategic location and this unique situation of the extant permission combined with evidence the site will come forward with the submission of a current planning application, it is being</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>reallocated in the RLDP to contribute towards the RLDPs employment provision/growth strategy - set out in Policy S1 and Policy S10.</p> <p>The applicant is providing up-to date survey work including updated FCA, drainage plans, ecological and landscape assessments as part of the planning application process and this will be assessed appropriately with under the current LDP/ proposed RLDP framework and National Policy requirements of Chapter 6 PPW as part of the planning application process.</p>	
1677 / Councillor Frances Taylor / Objection	<p>There is little regard paid to the Gwent Levels and to the Magor and Llandeenny SSSI. Siting of employment allocations in this location is contrary to PPW. The allocation presents unacceptable environmental damage to the SSSI due to the risks posed to the drainage system and water quality of the Gwent Levels. There is also a potential impact on the ancient settlement of Llandeenny and the landscape character of the Gwent Levels.</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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for developments within this nationally special designation, this site has an exceptional circumstance with an extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p>	No change required.
1787 / Gwent Wildlife Trust / Comment	<p>Refer to the location of the site in the Gwent Levels SSSI and state there should be no development in the SSSI. Understand there is an extant planning permission on this site and would like to reinforce that should development proceed there needs to be stringent measures in place, together with adequate post-construction monitoring to ensure that water quality is not adversely affected.</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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for developments within this nationally special designation, this site has an exceptional circumstance with an extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Correspondence with the site promoter has indicated that a new design to the development is preferable and this requires a planning application to bring this forward. The applicant is pursuing a planning consent under the current LDP (DM/2025/00825) and providing up-to date survey work including updated FCA, drainage plans, ecological and landscape assessments as part of the planning application process and this will be assessed appropriately with under the current LDP/ proposed RLDP framework and National Policy requirements of Chapter 6 PPW as part of the planning application process. Post construction monitoring will be considered as part of the planning application process.	
3345 / Anthony Pickup / Objection	Development of these sites poses immediate ecological conservation and landscape threats as well as long-term threats to dealing with climate change. S4 - Industrial development on natural or semi-natural land habitats should only be permitted under extreme circumstances and only if remediation greatly exceeds the losses caused by the development. Development on land that presents significant threats to Sites of Special Scientific Interest should not be undertaken. These are in conflict with this. Designating almost a half of its economic development area on carbon-sink land is unacceptable. S5; CC1; NR1 and NR3 - On an ecological level, the industrial development presents unacceptable environmental hazard to the Llandeenny and Redwick SSSIs due to the risks posed to the drainage system of the Gwent Levels. The run off poses a serious risk to the water quality of the Gwent Levels. The toxicity from contaminants concern. Impact on the reens and on flora/fauna. There are carbon sink implications. LC1 -	<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, to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for developments within this nationally special designation, this site has an exceptional circumstance with an extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p> <p>Correspondence with the site promoter has indicated that a new design to the development is preferable and this requires planning consent to bring this forward. The applicant is pursuing a planning consent under the current LDP (DM/2025/00825) and providing up-to date survey work including updated FCA, drainage plans, ecological and landscape assessments as part of the planning application process and this will be assessed appropriately with under the current LDP/ proposed RLDP framework and National Policy requirements of Chapter 6 PPW as part of the planning application process. Energy renewables in design and Post construction monitoring will be considered as part of the planning application process.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>On a social level, these two developments will have a significant adverse effect on the tiny community of Llandeenny which they surround. S4 - All industrial development approval should be conditional on the provision of as much on-site renewable energy generation as possible. To this end it should be a planning condition that the roofs of all new development be designed to support solar panels, unless the roof design needs to allow natural lighting to the work area below that would militate against panels. Fabric-roofing must be banned.</p>		
3492 / Claire Richards / Objection	<p>Allocation of Gwent Euro Park, Magor is on SSSI and protected from development by PPW. The credibility of the extant planning permission is arguable; it has been extended repeatedly with changes of use class. Planning permission is not for a waste site.</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; to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for development within this nationally special designation, this site has an unique exceptional circumstance with the fact that it has extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p> <p>The planning history is set out below:</p> <p>Outline planning permission for the MCC part of the overall site was granted in March 1995 under ref: A35349. This consent was subsequently renewed twice to extend the time for the submission of reserved matters by virtue of planning permissions granted in April 2000 under ref: M/4002 and in June 2003 under ref: M/8467. The operational outline planning permission is therefore M/8467. A reserved matters application was subsequently granted planning permission on</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>19/09/2007 relating to the site for a B8 distribution facility with associated two storey offices (63,000 sq.m. B8 use with 4,300 sq.m. B1 floorspace), single storey gatehouse and vehicle maintenance unit (VMU) (ref: DC/2007/00835). All pre-commencement conditions regarding that site were discharged and a meaningful commencement of that development was accepted by MCC officers in writing in August 2008. On the 2/9/2020 planning permission was granted for a Section 73 application for the variation of condition 9 of M/8467 to allow for primary B2 and B1 uses as well as the previously B8 (DM/2018/0282). Thus, the site benefits from an extant planning permission for a B8, B2 and B1 development.</p> <p>Moreover, immediately adjacent land, which lies within Newport Council Local Planning Authority and which forms part of the extant planning permission, is currently being developed for employment use.</p> <p>Given the site's strategic location and this unique situation of the extant fallback permission combined with evidence the site will come forward (with the submission of a current planning application), it is being reallocated in the RLDP to contribute towards the RLDPs employment provision/growth strategy - set out in Policy S1 and Policy S10.</p>	
3713 / Mark Petersen / Objection	<p>The proposal would change the historical landscape of the area and the use of B2 in this area does not accord with policy LC1 on protection of historical landscape value. The proposed development would have a visual, noise and light pollution impact which would have a detrimental effect on neighbouring properties and on local, established wildlife species. Concern re increased flooding caused by run off, potential access issues to the hamlet of Llandeenny with flooding and landslides affecting the access road and pollution of the protected reens of the Gwent Levels. Development would be in contravention of para 6.4.25 which sets out that development in SSSI which is not</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; to support to support job growth in the County and this also 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.</p> <p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for developments within this nationally special designation, this site has an unique exceptional circumstance with the fact that it has extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p> <p>The planning history is set out below:</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>necessary for the management of the SSSI must be avoided.</p>	<p>Outline planning permission for the MCC part of the overall site was granted in March 1995 under ref: A35349. This consent was subsequently renewed twice to extend the time for the submission of reserved matters by virtue of planning permissions granted in April 2000 under ref: M/4002 and in June 2003 under ref: M/8467. The operational outline planning permission is therefore M/8467. A reserved matters application was subsequently granted planning permission on 19/09/2007 relating to the site for a B8 distribution facility with associated two storey offices (63,000 sq.m. B8 use with 4,300 sq.m. B1 floorspace), single storey gatehouse and vehicle maintenance unit (VMU) (ref: DC/2007/00835). All pre-commencement conditions regarding that site were discharged and a meaningful commencement of that development was accepted by MCC officers in writing in August 2008. On the 2/9/2020 planning permission was granted for a Section 73 application for the variation of condition 9 of M/8467 to allow for primary B2 and B1 uses as well as the previously B8 (DM/2018/0282). Thus, the site benefits from an extant planning permission for a B8, B2 and B1 development.</p> <p>Moreover, immediately adjacent land which lies within Newport Council Local Planning Authority and which forms part of the extant planning permission, is currently being developed for employment use.</p> <p>Given the site's strategic location and this unique situation of the extant permission combined with evidence the site will come forward with the submission of a current planning application, it is being reallocated in the RLDP to contribute towards the RLDPs employment provision/growth strategy - set out in Policy S1 and Policy S10.</p> <p>The applicant is providing 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 and the proposal will be assessed appropriately with under the current LDP/ proposed RLDP framework and National Policy requirements of Chapter 6 PPW as part of the planning application process.</p>	
3817 / Tyrone Broome / Objection	<p>Concerns re loss of rare back-fen field patterns and change in landscape character. Concerns development will have adverse impact on landscape, historic landscape, flooding and pollution of SSSI,</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, to support to support job growth in the County and this also 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.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>natural environment, wildlife, and dark skies due to increase in light pollution. Concerns re lack of consideration given to impacts on Llandeenny by developments.</p>	<p>The site has previously been strategically identified as an employment site within Monmouthshire, with the allocation SA1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, whereby National Policy PPW does not allow for developments within this nationally special designation, this site has an unique exceptional circumstance with the fact that it has extant planning permission – meaning that they can commence development on the site without the need to apply for future planning permission.</p> <p>The planning history is set out below:</p> <p>Outline planning permission for the MCC part of the overall site was granted in March 1995 under ref: A35349. This consent was subsequently renewed twice to extend the time for the submission of reserved matters by virtue of planning permissions granted in April 2000 under ref: M/4002 and in June 2003 under ref: M/8467. The operational outline planning permission is therefore M/8467. A reserved matters application was subsequently granted planning permission on 19/09/2007 relating to the site for a B8 distribution facility with associated two storey offices (63,000 sq.m. B8 use with 4,300 sq.m. B1 floorspace), single storey gatehouse and vehicle maintenance unit (VMU) (ref: DC/2007/00835). All pre-commencement conditions regarding that site were discharged and a meaningful commencement of that development was accepted by MCC officers in writing in August 2008. On the 2/9/2020 planning permission was granted for a Section 73 application for the variation of condition 9 of M/8467 to allow for primary B2 and B1 uses as well as the previously B8 (DM/2018/0282). Thus, the site benefits from an extant planning permission for a B8, B2 and B1 development.</p> <p>Moreover, immediately adjacent land which lies within Newport Council Local Planning Authority and which forms part of the extant planning permission, is currently being developed for employment use.</p> <p>Given the site's strategic location and this unique situation of the extant permission combined with evidence the site will come forward with the submission of a current planning application, it is being reallocated in the RLDP to contribute towards the RLDPs employment provision/growth strategy - set out in Policy S1 and Policy S10.</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		The applicant is providing 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 and the proposal will be assessed appropriately under the current LDP/ proposed RLDP framework and National Policy requirements of Chapter 6 PPW as part of the planning application process.	

## Policy EA1i – Raglan Enterprise Park, Raglan

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	The site is crossed by a 1" diameter watermain. No public sewers crossing the site. Site is in the catchment area of Raglan WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1138 / Raglan Community Council / Objection	Raglan CC object to Raglan Enterprise Park Employment and Renewable Energy. It would appear that this site is not included within the settlement boundary. The boundary follows the Nant-y-Wilcae brook. It would seem that the boundary is different on different documents. It would seem to be outside the settlement on page 27 in the Boundary Review and page 92 in the Raglan combined 2023 document.	<p>Both the renewable energy allocation made under Policy CC2 and the employment allocation EA1i relating to land at Raglan Enterprise Park are outside of the settlement boundary on the Proposals Plan and in the Settlement Boundary Review. 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 employment allocation is considered to be a logical extension to the existing employment provision at Raglan Enterprise Park.</p> <p>With regards to locating the renewable energy allocation beyond the settlement boundary this is an approach consistent with national planning policy to avoid incorporating large areas of land within a settlement boundary which then has an in-principle acceptance of new built development. Planning Policy Wales notes renewable energy proposals as being an acceptable form of development within a Green Wedge and whilst this land is not a Green Wedge, this policy position establishes an acceptance for renewable energy proposals beyond the settlement boundary on land classified as open countryside, subject to detailed considerations.</p>	No change required.
3930 / Mr Robert Hughes / Objection	The units are on good agricultural land and we need to be focused on food security as a priority and not using quality land for light industrial purposes.	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.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The ELR also considers the appropriateness of the candidate sites put forward for employment use for allocation for such use and concluded 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 County. The potential benefits of the complementary renewable energy allocation are also noted. The provision of additional small and medium enterprises (SMEs) 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.</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 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.</p>	

## Policy EA1j – Land West of Raglan

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. No public sewers crossing the site. Site is in the catchment area of Raglan WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
2498 / Councillor Penny Jones / Objection	Land west of Raglan is proposed on agricultural land and totally change the scenic picture of the historical village.	<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 use, 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>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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>mature trees on the eastern verge of 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.</p> <p>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.</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 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 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.</p>	
1138 / Raglan Community Council / Objection	If this site is included in the RLDP, this will have a detrimental impact on the management of ground and surface water. There will be an increase in ground and surface water due to the large roof areas and the hard landscaping to and around the proposed buildings. The view in Raglan	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	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>of an expanded industrial area is not acceptable. It would also result in visually prominent large sheds and would set a precedent for northward extension towards the A40.</p>	<p>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 use, 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>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 of 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.</p> <p>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</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>requirements set out in the RLDP, the proposed allocation is not considered to detrimentally harm the setting of the Castle or wider views.</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>	
1984 / Raglan Village Action Group / Objection	<p>Object to site allocation. CS Assessment report's conclusion is no justification for allocating the land and suggests MCC has longer term aspirations for the growth of Raglan village which would be contrary to the Inspector's decision on the 111 site which was rejected on sustainability grounds. EA1j would result in visually prominent large sheds and run-off would exacerbate flooding risks downstream. It would also set a precedent for the northward extension towards the A40 and its roundabout. Bus connections are poor inevitably resulting in increased journeys by car.</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 employment use for allocation for such use and concluded that land promoted under candidate site CS0278 – Land West of Raglan, would be suitable for employment use, 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>	No change required.

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		<p>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 of 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.</p> <p>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 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.</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>In accordance with the RLDP policy framework, improvements to the public transport provision will be required at the planning application stage.</p> <p>Planning application DM/2018/01050 for 111 dwellings on land south of Monmouth Road, Raglan 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</p>	

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		<p>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.”</p> <p>Having regard to the Minister’s Letter, site allocations proposed in Raglan have been promoted through the candidate site and Replacement Local Development Plan process and have therefore been subject to consultation and are justified within the context of the RLDP’s overarching strategy and therefore address the concerns of the Inspector in refusing permission.</p>	
2411 / Messrs & Mrs Evans / Support	Strongly support EA1j allocation as a strategic employment site. The site offers significant potential to address Monmouthshire's critical need for high-quality commercial land and to support the Council's broader objectives for economic growth and sustainability. Key benefits of the site include its strategic location and connectivity, economic growth and resilience and community integration. Site EA1j is an essential component of the RLDP, offering a sustainable and strategic solution to Monmouthshire's employment land needs.	Support welcomed.	No change required.
2411 / Messrs & Mrs Evans / Objection	While we support the allocation, the RLDP would benefit from additional clarity on the deliverability of employment sites, including specific timelines for infrastructure readiness, measures to mitigate environmental impacts, and a stronger articulation of how regional collaboration is robust, adaptable, and	Support welcomed. Reflecting the Council’s ambitions for economic prosperity, the Replacement Local Development Plan (RLDP) provides the policy framework to support 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	No change required.

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	capable of meeting Monmouthshire's economic and sustainability objectives.	<p>facilitate economic growth in a range of sectors to identifying sufficient employment land.</p> <p>Appendix 10 of the RLDP provides an indicative phasing schedule for the employment allocations made within the RLDP. 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>	
1939 / Mr Matthew Hayes / Objection	The industrial development is completely out of place in this rural area. It would detract from the historic setting of the village which with its castle is important tourist asset for the county.	<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 use, 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>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</p>	No change required.

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		<p>employment allocation more sensitively into the landscape with an existing line of mature trees on the eastern verge of 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.</p> <p>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.</p>	
3273 / Lisa Wadley / Objection	<p>Concerns re road and transport infrastructure being unsuitable and increasing dependency on car use making the area more dangerous. Lack of Active Travel links and frequent speeding near the proposed development. The development will not provide many local jobs for the people of Raglan due to the nature of the specialised businesses likely to be occupying the site. Concerns re damage to local wildlife and farmland and habitat loss. Otters present close to the site.</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 use, 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</p>	No change required.

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		<p>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 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.</p> <p>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.</p> <p>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.</p>	

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3364 / Mr David Payton / Comment	<p>Immediately adjacent to the short walk beside and parallel the road, offers a unique and valuable community amenity area close to and within easy reach of the village that has clear views to the mountains of Bannau Brycheiniog. The proximity to the village and views to the west give it a clear high amenity value not found anywhere else close to the village.</p> <p>I would add that I am supportive of the principle of providing employment opportunities within easy reach of local settlements to reduce commuting, car use and reductions in pollution.</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 use, 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>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 of 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</p>	No change required.



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		<p>required in accordance with policy PM1 – Creating Well-designed Places. Further placemaking principles will be determined at the planning application stage.</p> <p>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.</p>	
3428 / Mr Peter Woodrow / Objection	Question the demand. Not the right location should be located further from housing. Sites off Pen y Parc Road adjacent to Little Castle Business Park and the Grange Mill Industrial estate which are more appropriate.	<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 use, 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. The site also benefits from good links to Raglan's amenities.</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>The existing employment provision at Little Castle Business Park and Grange Mill Industrial Estate are protected for employment purposes under policy EA2 –</p>	No change required.

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		Protected Employment Sites. However, land adjoining these sites was not put forward for consideration for inclusion in the RLDP as part of the candidate site process.	
3461 / Mrs R Davies / Objection	Flooding - the natural drainage of the land would disappear completely. It would make the flooding problem worse in Raglan. Employment land will result in noise, lights, traffic, etc. The land is higher so could have tall structures, lit constantly and visible from many parts of the village. The site could expand in the future. The loss of natural habitat and wildlife. There is already an industrial estate in Raglan. More vehicles and more pollution as the area is not cyclable. The development will damage the village.	<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>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.</p> <p>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</p>	No change required.

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		<p>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.</p> <p>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 of 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.</p> <p>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.</p> <p>With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals in terms of amenity issues including air pollution, light pollution and noise pollution.</p> <p>In terms of 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</p>	

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		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.	
3464 / Mr Colwyn Knight / Objection	Site EA1j (land west of Usk Road - industrial) should not be included in the RLDP. This is valuable agricultural land and not the site for an industrial complex. There are empty units on the existing site at Pen y Parc Road (and suitable land adjacent), which should be allocated first.	<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 use, 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</p>	No change required.

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		<p>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 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.</p> <p>The existing employment provision at Little Castle Business Park and Grange Mill Industrial Estate are protected for employment purposes under policy EA2 – Protected Employment Sites. However, land adjoining these sites was not put forward for consideration for inclusion in the RLDP as part of the candidate site process.</p>	
3604 / Mr Daniel Elward / Objection	<p>Concerned re current use as agricultural land, development likely to remove drainage and increase water run off from the site, increasing likelihood and severity of flooding. Site significant in comparison to Raglan and will significantly increase levels of air, land, noise and light pollution. Proposal with unacceptable impact on visual and landscape character of the area. Feasibility of transport through Raglan severely impacting with existing concerns over safety being added to rather than addressed. Concern over wildlife habitats at the site. Access route proposed on unowned private land. Concern over potential impact to views from Raglan Castle, and impact on the Raglan CA. Notes little castle industrial units are not fully utilised currently so has no need for further employment when existing isn't being made use of.</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 use, 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>	No change required.

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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 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.</p> <p>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 of 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.</p> <p>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.</p> <p>Having regard to Transport Statement prepared in support of the proposed site allocation, MCC Highways consider both the proposed site access onto Usk Road</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>and the traffic generation and distribution to be acceptable in principle. Further detailed analysis will be required as part of a planning application submission.</p> <p>In terms of 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>With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals in terms of amenity issues including air pollution, light pollution and noise pollution.</p>	
3632 / Mr George RV Ashworth / Objection	<p>Object to EA1j. MCC assessment notes the damage to high quality agricultural land and on the setting and landscape of the village but concludes the site's allocation will provide much needed employment land. This is no justification at all, and implies far more car borne journeys to Raglan and suggest MCC have longer terms aspirations for growth of Raglan village. EA1j, if developed would result in visually prominent large sheds, and the run-off would exacerbate flooding risks downstream. It would also set a precedent for the northward extension towards the A40 and its roundabout.</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 use, 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>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<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 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.</p> <p>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 of 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.</p> <p>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.</p>	



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>In terms of 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>	
3878 / Mrs Rebecca / Objection	Concerns re flood risk and surface water affecting other areas of Raglan. Concerns re significant increase in air pollution during and after construction and increasing traffic having a negative impact on public health. Use of land will have negative impact on light pollution, noise pollution, privacy, visual and landscape character, wildlife and the natural environment. Existing employment site is underutilised and should be filled before new development is built.	<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 use, 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>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<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>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 of 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.</p> <p>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.</p> <p>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.</p> <p>In terms of 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>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals in terms of amenity issues including air pollution, light pollution and noise pollution.</p>	
3930 / Mr Robert Hughes / Objection	The units are on good agricultural land and we need to be focused on food security as a priority and not using quality land for light industrial purposes.	<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>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<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 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.</p>	

## Policy EA1k – Land to the East of Abergavenny

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	No watermains crossing the site. The site is crossed by a 300mm diameter foul sewer and a 305mm diameter surface water sewer. Site is in the catchment area of Llanfoist WwTW. Add that the comments do not assess capacity.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1367 / Abergavenny and District Civic Society / Objection	Object to the small amount of land (less than two hectares) allocated for new industrial and business use at Abergavenny in Policy EA1. Options for an increased allocation included within HA1 mixed use site (possibly extended), and a westward extension of the Avara site.	<p>Comments noted. 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 section of the allocation, located on 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.</p> <p>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 ‘community hub’. In this respect, additional land for B1 use classes is not considered to be required.</p> <p>With regards to the Avara site, no candidate site submission was made in relation to extending the site and it has therefore not been considered as part of the site selection process. The former Avara site is, however, protected in the Replacement Local Development Plan (RLDP) for employment uses under policy EA2e but under the name Former Cranberry Food, Abergavenny. The Council recognises the potential contribution this site could make to Monmouthshire’s economy and has, therefore, sought to retain it for employment use. In addition, the Council’s</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Economy, Employment and Skills Team are continuing to explore opportunities for alternative occupiers for the premises.	
1376 / Abergavenny Transition Town / Objection	Consistent demand around Abergavenny appears to be for small and medium light industrial units. Proportion of land allocated at Abergavenny East may be insufficient. Opportunity ought to be taken to use employment as a buffer against the traffic noise from the A465.	<p>Comments noted. 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 on 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.</p> <p>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 'community hub'. In this respect, additional land for B1 use classes is not considered to be required.</p>	No change required.
1965 / Monmouthshire Housing Association (MHA) / Support	In principle, the inclusion of 1ha of B1 uses is supported, in that it is commensurate with the long-term vision and objectives of this key strategic site to create and establish a well-balanced and cohesive community with a range of land uses. Given the site's location, directly located adjacent to Abergavenny railway station, the site's integration of B1 uses represents a suitable proposal to promote and support sustainable travel and play a significant role in the delivery of employment uses.	Support welcomed.	No change required.

## Policy EA1I – Land at Former MoD Site, Caerwent

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	Note a water supply can be provided for this site but that a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system. The potential 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). The proposed development site is in the catchment of Caerwent Wastewater Treatment Works (WwTW). Welsh Water is delivering a scheme at the WwTW by 22 December 2027, and advise that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of a scheme at the WwTW.	Comments noted. The Council will continue to work with Dŵr Cymru Welsh Water on the RLDP.	No change required.
1745 /Redi 205 Ltd / Objection	The Site Promoter would maintain that a wider/ more flexible designation (which allows for a mix of B1 and C2 uses, in addition to the residential element) remains viable and would present a preferable option in terms of making the most efficient use of this sustainable/brownfield site. Although the Site Promoter would therefore object to the proposed mix of uses that have been allocated, it is reiterated that the Deposit	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 at Former MoD, Caerwent (Policy EA1I) for B1 uses. 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	No change required.

	allocation remains viable without the inclusion of the care home element.	<p>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 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.</p>	
1787 / Gwent Wildlife Trust / Comment	<p>Welcome the intention within the policy referring to protected and priority species however stress the particular importance of the Lesser Horseshoe Bat maternity roost in this location. Note any mitigation/compensation measures need to be enhanced to take account of potential impacts to Lesser Horseshoe Bats, Dormice and reptiles present on the site. State the maternity roost and any habitat links away from it will need particular protection.</p>	<p>Comments notes. Further evidence and ecological survey work and masterplan design is required at the planning application stage to demonstrate protected and priority species identified on site will be safeguarded and this is also ensured as noted through Policy HA9 criteria (d)- (g). Furthermore, Strategic 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 address concerns of impact maintaining protected 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.</p>	No change required.



## Policy EA1m – Land to the East of Caldicot/North of Portskewett

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	Note a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system. The potential 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 and sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Add that the site is crossed by 25mm, 150mm & 2" diameter watermains. Note that the Nash Wastewater Treatment Works (WwTW) can accommodate foul flows from the proposed development site.	An Infrastructure Delivery Plan 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 sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plan's sites allocations. The IDP is included within Appendix 8 of the RLDP and reflects the comments made by Dŵr Cymru Welsh Water (DCWW).  The Council will continue to work with DCWW throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1365 / Mr Adrian Lewis / Objection	Land East of Caldicot/North of Portskewett -no proof of demand from businesses. This was initially proposed for the Crick Road development and there was no demand from business.	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.  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.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1461 / MCC Estates / Objection	Refer to the minimum of 1ha B1 use class employment land on the indicative masterplan noting the positioning of the employment land is not considered to present the most appropriate location for such a use from a visual impact, density and placemaking perspective. While it is recognised the positioning is indicative it is objected to.	Comments noted and acknowledged. While it is recognised that further dialogue regarding the masterplanning of the site has taken place with the site promoters since the Deposit RLDLP 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 as suggested.	No change required.
1663 / Richborough / Objection	While support the principle of potentially including a small element of employment land as part of the allocation state this should be based on market demand and considered as future planning applications come forward. Suggest flexibility must be applied when considering development proposals that come forward at the site over the plan period to ensure the most appropriate mix of uses are delivered.	<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 HA2/EA1m for 1ha of B1 uses.</p> <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>It is not, therefore, considered appropriate to delete the requirement for B1 use class employment on the site, as suggested.</p>	No change required.
3949 / Mrs Sarah Spencer / Objection	The industrial units proposed for the Brooms site in Crick are inappropriate for the area especially the potential proposal for waste disposal.	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.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<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>The site referred to by the representor as having potential for 'waste disposal' relates to EA1e/Policy W3 (W3f) Land adjoining Oak Grove Farm, Crick which falls outside of the HA2 site boundary. While the site has potential for such a use this would be subject to detailed planning considerations. Representations received on EA1e relating to Employment Allocations and the inclusion of the proposed site at Land adjoining Oak Grove Farm, Crick are fully considered in the relevant section of the report.</p>	

## Policy EA2 – Protected Employment Sites

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3118 / Councillor Meirion Howells / Support	I support the importance of protecting existing employment sites and premises over the Plan period to ensure there is an appropriate portfolio of employment land and premises that can be safeguarded from competing uses and provides for a sufficient quality, range and choice.	Support welcomed.	No change required.
1376 / Abergavenny Transition Town / Comment	Closed Avara site at the Hardwick roundabout outside Abergavenny should be investigated for its maximum potential beyond existing boundaries.	The former Avara site is protected in the Replacement Local Development Plan (RLDP) for employment uses under policy EA2e but under the name Former Cranberry Food, Abergavenny. The Council recognises the potential contribution this site could make to Monmouthshire's economy and has, therefore, sought to retain it for employment use. In addition, the Council's Economy, Employment and Skills Team are continuing to explore opportunities for alternative occupiers for the premises.	No change required.
3562 / Gateway to Wales Action Group / Support	Support the principles of Policy EA2.	Support welcomed.	No change required.
2239 / Mr Ian Vicary / Objection	Expected information regarding Old Turkey Factory in Abergavenny and for it to become a multi-use facility with potential for employment.	The former Old Turkey Factory site is protected in the Replacement Local Development Plan (RLDP) for employment uses under policy EA2e but under the name Former Cranberry Food, Abergavenny. The Council recognises the potential contribution this site could make to Monmouthshire's economy and has, therefore, sought to retain it for employment use. In addition, the Council's Economy, Employment and Skills Teams are continuing to explore opportunities for alternative occupiers for the premises.	No change required.
2299 / Mr Maurice Barnes / Support	The closed Avara site at the Hardwick roundabout should be investigated for its maximum potential as industrial units.	The former Avara site is protected in the Replacement Local Development Plan (RLDP) for employment uses under policy EA2e but under the name Former Cranberry Food, Abergavenny. The Council recognises the potential contribution this site could make to Monmouthshire's economy and has, therefore, sought to retain it for employment use. In addition, the Council's Economy, Employment and	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Skills Team are continuing to explore opportunities for alternative occupiers for the premises.	
3307 / Edwinda Williams / Comment	This comment relates to an existing business park. No provision noted for any increase of Employment Land at Little Castle Business Parc. Concerned that the Plan, which will run to 2033, will prevent any future development of the site and going forward any planning applications will not be considered as they could be outside of the present designated area.	As noted in the comments, the Replacement Local Development Plan (RLDP) proposes to allocate Little Castle Business Parc as a Protected Employment Site under Policy EA2w. This protects the defined area identified on the Proposals Map for industrial and business development (Use Classes B1, B2 and B8). This policy protection provides scope and more flexibility to enhance industrial and business development within the allocated area compared to the existing Adopted Local Development Plan, where Little Castle Farm is in the open countryside and more stringent policies apply. With regards to expanding Little Castle Farm beyond the identified boundary, other RLDP policies would be applied depending on the proposal. Policy RE1 of the RLDP provides the policy framework for assessing small-scale purpose built industrial and business development for settlements such as Raglan. This does require proposals to be adjoining settlement boundaries, and whilst Little Castle Business Parc does not adjoin the settlement, the proximity and links to Raglan could be considered. Alternatively, policy RE3 – Agricultural Diversification may be relevant if the proposal is a form of agricultural diversification, however, any proposals would be considered on their own merits. However, it should be noted that the land beyond the identified boundary is open countryside which national and local policy seeks to protect from unsuitable development.	No change required.
3319 / Nr A Andrew Hubert von Staufer / Objection	The Industrial sites in Hadnock Road and Wonastow Road are already prone to flooding.	Protected employment sites EA21 – Wonastow Road and EA2m – Mayhill/Hadnock Road, are located within the Defended Flood Zone within the Welsh Government Flood Maps for Planning. Any proposals put forward with the industrial sites would, therefore, be required to satisfy national flood risk planning policy set out in Technical Advice Note 15: Development, Flooding and Coastal Erosion. Of relevance to the consideration of proposals, is that employment uses are classified as less vulnerable development, and the sites are considered to be brownfield. It is important to note that policy EA2 protects the sites for employment uses rather than allocating them for new development.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3808 / Ms M K Annandale / Objection	The whole of Wonastow Road industrial estate is flooded and unusable. Waste of time, money and a danger to life.	Protected employment sites EA21 – Wonastow Road is located within the Defended Flood Zone within the Welsh Government Flood Maps for Planning. Any proposals put forward with the industrial sites would therefore be required to satisfy national flood risk planning policy set out in Technical Advice Note 15: Development, Flooding and Coastal Erosion. Of relevance to the consideration of proposals is that employment uses are classified as less vulnerable development, and the site is considered to be brownfield. It is important to note that policy EA2 protects the site for employment uses rather than allocating them for new development.	No change required.

## Policy E1 – Protection of Existing Employment Land

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1367 / Abergavenny and District Civic Society / Objection	<p>We support Policy E1 but wish for amendments to paragraphs including 6.1.3, 6.3.10 et seq, and 16.1.1 which mislead the reader regarding the numerical relationship between the number of homes to be built and the number of extra jobs likely to be created in the county. We sense that the Council now recognises that the number is highly aspirational, and accepts that, unlike housing targets, the planning authority has very limited influence on whether employment targets are achieved except by ensuring an adequate supply of land and labour.</p> <p>The plan should say that it provides for employment growth of between a trend-based number of about 3,300 extra jobs and the Council's ambition that up to about 6,250 extra jobs are created. We hope that it will be possible to monitor employment change to test the outcome of these figures.</p>	<p>Support for Policy E1 is welcomed. With regards to the jobs figure contained in the Replacement Local Development Plan (RLDP), paragraphs 6.3.10 – 6.3.19 set out details that the figure has emerged from demographic-led modelling which is considered to be robust and includes credible assumptions and represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. Further clarification is therefore not considered necessary. It is recognised that the job figure is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, reflecting the Council's ambitions for economic prosperity and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised the jobs target of 416 jobs per annum is higher than some past trends, it is within the range of past performance in the County. Furthermore, the Employment Land Review (2022) confirms that the job figure is driven by policy interventions intended to support housing and employment growth to achieve an outcome which exceeds a continuation of trends. It should also be noted that not all jobs will be in B use classes. 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. It is not, therefore, considered necessary to amend the Plan as suggested.</p> <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>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		The RLDP includes a monitoring framework which will be used to assess whether the Plan's strategies, policies and proposals are being delivered. This includes a range of indicators relating to the delivery of the RLDP's economic growth objectives, which can be viewed in the Monitoring and Review Chapter of the RLDP.	
1663 / Richborough / Objection	Suggest Policy E1 should be written to reflect the acknowledgement in paragraph 16.5.3 that there may be instances where sites allocated or designated for employment uses are no longer appropriate. State this is an important recognition to ensure sufficient flexibility is provided through the plan to ensure sites come forward and with the most appropriate mix of uses.	Criterion a) of policy E1 already allows for the consideration of other non-employment uses if the site or premises is no longer suitable or well-located for employment use. This is considered sufficient to address the concerns raised.	No change required.
3780 / South Wales Land Developments Ltd / Objection	<p>Support the broad principle of Policy E1 and the criteria against which the loss of employment land for other uses is to be assessed.</p> <p>However, neither the policy nor its supporting justification clarifies whether all criteria need to be met to satisfy it. Assume that all criteria have to be met. Policy allows two exceptions - small scale retail and small scale services not suited to the high street. Suggest that this is too narrow and should be broadened to enable other uses which could be significant employment generators, for example specialist housing that allows an element of care.</p>	<p>Broad support for Policy E1 is welcomed. With regards to the application of the policy, all of the criteria are to be met; however, it is standard practice to assess each proposal on a case-by-case basis and have regard to any other material considerations.</p> <p>The purpose of Policy E1 is to protect existing or proposed employment sites for industrial and business uses within Use Classes B1, B2 and B8. Other uses outside of these and the exceptional uses listed in criteria i) and ii) are not encouraged. The inclusion of specialist housing within this would weaken the policy and is not considered appropriate. The RLDP contains a specific policy for the consideration of specialist housing – Policy H7.</p>	No change required.



## Policy E2 – Non-Allocated Employment Sites

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1367 / Abergavenny and District Civic Society / Objection	<p>Policy E2 is inadequate because an unallocated employment site can only be permitted if the use cannot be accommodated on existing or proposed industrial or business sites elsewhere in the county. The present availability of the vacant Avara building and offices in the town centre, does not weaken the need for more land and business development.</p> <p>Condition b) should either be omitted or condition b) may not be applied where the proposal meets a need for a large employer in a part of the county lacking allocated space' should be added. Reference to large employer enterprises in para 16.6.1 is unnecessary.</p>	<p>Policy E2 provides scope for the consideration of an industrial and business development to be considered adjoining the settlement boundaries of the County's primary settlements. The requirement to consider existing industrial or allocated sites in the first instance is considered to be consistent with a plan-led approach and to ensure brownfield opportunities are sufficiently considered before additional greenfield sites outside of the defined settlement boundaries. The availability of the vacant Avara building would not necessarily rule out a different site being considered against the policy, but it's reuse should be considered before alternative undeveloped sites.</p> <p>However, the requirement for potential users to be a single-site user is considered to be overly restrictive as this would rule out non-speculative developments with a number of end-users lined up. It is therefore proposed to remove the requirement for proposals to be for 'single-site users'. Proposals will, however, have to demonstrate that they are non-speculative to avoid the development of land beyond the settlement boundaries and remaining vacant.</p> <p>Agree that reference to 'large employers' in paragraph 16.6.1 is unnecessary and will be removed. The same applies to the reference in paragraph 16.6.2.</p>	<p>The requirement for proposals to be for 'single-site users' is to be removed from Policy E2. In addition, reference to 'single-site users' will be removed from paragraph 16.6.1 and 'large employers' will be removed from paragraphs 16.6.1 and 16.6.2.</p>
3492 / Claire Richards / Objection	<p>Conflicts with policy S2 as allows development adjacent to settlement boundaries, therefore in open countryside.</p>	<p>Planning Policy Wales recognises that within the context of rural areas, some industries 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. Whilst Policy E2 relates to Monmouthshire's Primary Settlements, the same principles are considered to apply, allowing for the consideration of such enterprises adjacent to the County's most sustainable settlements. Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. Policy E2 is considered necessary to allow a degree of flexibility in the consideration of economic proposals and potential changes in circumstances, but within the parameters set out in Policy E2.</p> <p>The requirement for potential users to be a single-site user is considered to be overly restrictive as this would rule out non-speculative developments with a</p>	<p>No change required in relation this representation, however, Policy E2 is recommended to be amended by the removal of the requirement for proposals to be for 'single-site users'. In addition, reference to 'single-site users' will be removed from paragraph 16.6.1 and</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		number of end-users lined up. It is therefore proposed to remove the requirement for proposals to be for 'single-site users'. Proposals will, however, have to demonstrate that they are non-speculative to avoid the development of land beyond the settlement boundaries and remaining vacant. Furthermore, reference to 'large employers' in paragraph 16.6.1 is unnecessary and will be removed. The same applies to the reference in paragraph 16.6.2.	'large employers' will be removed from paragraphs 16.6.1 and 16.6.2.

## Strategic Policy S11 – Rural Economy

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	Policies for employment in rural areas need to make it clear that only classifications such as B1 are permitted in rural areas. Rural areas often do not have the infrastructure to accommodate other types of use due to narrow one-track roads which could not take the large vehicles used for general industry/ storage and distribution and would compromise the free flow of traffic as a result. In addition, in many rural areas there is inadequate water and sewerage infrastructure to support such agricultural diversification. General industry is also unsuitable for these areas due to not being part of the main highway routes and lacking the capacity for use by HGVs or larger types of vehicles.	The RLDP's approach to sustaining Monmouthshire's rural economy is consistent with national policy (PPW and Future Wales), which advocates an approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth. It is not considered appropriate to restrict economic opportunities in rural areas to B1 Use Class uses as other Use Classes may also be acceptable in a rural context. The RLDP provides the policy framework to assess proposals in the countryside to ensure they are acceptable in scale and an appropriate use to the locality.	No change required.
3492 / Claire Richards / Objection	Conflicts with policy S2 as allows development adjacent to settlement boundaries, therefore in open countryside.	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, 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. It is therefore proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Rural enterprise developments are recognised in PPW as a form of development potentially acceptable in the countryside. Policies S11 and S2 are therefore considered to be consistent with each other.	
3532 / Mr Nigel Haines / Objection	The government plans for growing the economy will have the opposite effect and will shrink it. Please consider this before building these houses.	Whilst the RLDP has regard to national policy, it is focussed on addressing local issues. In this respect, the Plan proposes a strategy and growth level that is considered appropriate to address some key challenges facing the County, including the provision of affordable homes and employment land. Given Monmouthshire's rural character, the need to sustain and regenerate the County's rural economy is also a key objective of the Plan with Policy S11 - Rural Economy, providing the strategic policy objectives in this regard.	No change required.
3886 / Mrs Nerys Wilson / Comment	Economic growth should focus on small scale sustainable initiatives that align with the village's conservation status such as local crafts, heritage tourism and small businesses that respect rural settings. Supporting small businesses and local enterprises that complement the rural character of Shirenewton is key. Large-scale commercial or industrial developments should be avoided in the village or its immediate surroundings.	Shirenewton is classified as a Main Rural Village in the settlement hierarchy identified in Policy S2 of the RLDP. Policy RE1 - Secondary and Main Rural Settlement Employment Exceptions, would therefore be of relevance to the consideration of economic proposals in or adjacent to Shirenewton. This sets out the criteria against which proposals would be considered including being of small-scale, no unacceptable harm on the natural and built environment and being compatible with the scale of the existing settlement. The Plan also provides the policy framework to consider tourism proposals, with Policy S12 - Visitor Economy, providing the strategic direction for the County. The RLDP planning policy framework, therefore, adequately addresses the concerns raised.	No change required.

## Policy RE1 – Secondary and Main Rural Settlements Employment Exceptions

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3492 / Claire Richards / Objection	Conflicts with policy S2 as allows development adjacent to settlement boundaries, therefore in open countryside.	<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, 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. It is therefore proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p> <p>Rural enterprise developments are recognised in PPW as a form of development potentially acceptable in the countryside. Policies RE1 and S2 are therefore considered to be consistent with each other.</p>	No change required.
3886 / Mrs Nerys Wilson / Comment	Rural enterprise policies should prioritise agricultural diversification, home based businesses and eco-friendly initiatives that support Shirenewton's heritage and landscape. Renewable energy projects should be carefully scaled and designed to avoid harming the village's aesthetics.	<p>The RLDP and its rural economy policies (S11 - Rural Economy and Policies RE1 - RE6) allow for both agricultural diversification and rural enterprises to be considered, providing a flexible approach to supporting Monmouthshire's rural economy opportunities. Economic proposals that come forward in or adjacent to Shirenewton would be assessed against all relevant policies of the Plan, with policy RE1 - Secondary and Main Rural Settlements Employment Exceptions, being of particular relevance. This sets out the criteria against which proposals would be considered including being small-scale, no unacceptable harm on the natural and built environment and compatible with the scale of the existing settlement. Renewable energy proposals would be considered against Policy CC3 - Renewable Energy Generation. This includes a criterion to have no unacceptable adverse impacts upon the landscape, townscape and historic features. The RLDP planning policy framework is considered to adequately address the concerns raised and no changes are therefore required.</p>	No change required.

## Policy RE5 – Intensive Livestock / Free Range Poultry Units

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1001 / Campaign for the Protection of Rural Wales / Objection	Policy fails to adequately address the numerous problems associated with this type of development and does not follow WG guidance as there is no reference to cumulative impact. Nor does it address impacts on habitats systems, the structure of the soil or the river systems of the County. Suggest a ban is placed on such development or that they are permitted in the most exceptional circumstances.	<p>A moratorium against such development would not be consistent with PPW and the Welsh Government Chief Planning Officer 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. However, as noted in the comments, both PPW and the Welsh Government Chief Planning Officer's letter refer to the need to consider the cumulative impacts of such developments. The addition of a policy criterion to address cumulative impacts is therefore considered appropriate.</p> <p>With regards to the impact of such developments on habitat systems and the structure of the soil or river systems, all relevant policies of the Plan and national planning policy and guidance would need to be satisfied in the determination of planning applications for such proposals. The RLDP is considered to have a robust policy framework to consider such issues, for example policies NR1 - Nature Recovery and Geodiversity and NR3 - Protection of Water Sources and the Water Environment, together with a Habitats Regulations Assessment where relevant, address the issues raised and do not therefore need to be repeated in Policy RE5. This is considered to provide an appropriate assessment criteria in line with Welsh Government guidance to ensure that potential pollutant impacts/pathways are fairly and reasonably addressed in consultation with statutory consultees such as Natural Resources Wales.</p>	Amend Policy RE5 with the addition of criterion e) 'there are no unacceptable cumulative impacts in combination with existing or consented development.'
3749 / Ms Jill Cantor / Objection	<p>Poultry units -</p> <p>1- the units are on the edge of town causing smells, noise and distress to locals and very off-putting to visitors</p> <p>2-The Wye is already suffering from massive pollution due to excess poultry units further upstream - why add more</p> <p>3- Why is the need for more poultry units in the area?</p>	<p>The inclusion of Policy RE5 into 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.</p> <p>Policy RE5, together with other policies of the Plan provide the policy framework to ensure potential pollutants/amenity issues are assessed in consultation with statutory consultees such as NRW. However, in addition to the criteria listed in Policy RE5, PPW and the Welsh Government Chief Planning Officer's letter of the</p>	Amend Policy RE5 with the addition of criterion e) 'there are no unacceptable cumulative impacts in combination with existing or consented development.'

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		12 <sup>th</sup> June 2018, do advise that the cumulative impacts of such developments are considered. It is therefore considered appropriate to add an additional criterion to the policy to address cumulative impacts.	

## Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1663 / Richborough / Objection	Suggests Policy RE6 is aimed at recreational and leisure uses of a small scale nature. Note there may be instances where larger scale recreational/leisure facilities could come forward in the County. Recognise that these may be in exceptional circumstances, however, allowances should be made for this to be considered if appropriate uses are proposed during the plan period. Such uses could bring a number of benefits including access to recreation and leisure opportunities, but also creation and the attraction of visitors to the County. Such sites would need to be carefully sited, but it is important that the plan allows for uses of this scale/nature to be considered.	The RLDP is considered to provide a planning policy framework flexible enough to consider exceptionally large scale recreation/leisure facilities should they come forward. Such larger scale proposals would act as visitor attractors beyond the Local Planning Authority area and Policy S12 - Visitor Economy, provides the strategic policy approach to developments that support Monmouthshire's visitor economy, with a suite of detailed development management policies applied as relevant. Policy 5 - Supporting Rural Economy of Future Wales, may also be of relevance to the determination of such proposals, given the potentially regional/national scale of development being suggested.	No change required.