

APPENDIX 3



Monmouthshire Replacement Local Development Plan 2018-2033

Report Of Consultation: Appendix 12
Deposit RLDP Representation Responses

Volume 4 – Climate Change

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Climate Change

Strategic Policy S4 – Climate Change

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Support	Welcome that the policy requires development to incorporate water efficiency measures and to minimise adverse impacts on water resources and quality, and particularly the emphasis on the use of sustainable urban drainage systems (SuDS). The tackling of surface water at source is a vital component of sustainable development and managing surface water at source will mitigate against overloaded sewers which can ultimately lead to flooding.	Support welcomed.	No change required.
1061 / Bannau Brycheiniog National Park (BBNP) / Objection	Question what the modelled impact that the Plan will have on the County meeting its decarbonisation trajectory, which isn't set out or referenced i.e. of the additional 6,210 homes and associated employment development proposed in an attempt to draw 13,950 people net to live in the County by the end of the Plan period.	The RLDP's proposals haven't been modelled in terms of their impact on carbon emissions. However, the Plan establishes a policy requirement for new homes to be constructed to net zero carbon standards and includes a suite of policies to ensure climate change considerations are a priority in assessing new development including the incorporation of green infrastructure, active travel routes, opportunities for nature recovery and a policy framework for promoting renewable energy generation. 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.	No change required.
1209 / Aneurin Bevan University Health Board / Comment	Design of homes and spaces will need to consider the impact of climate change and how this in turn will influence health. For example, keeping homes cool in the	Comments noted and acknowledged as being important considerations in the relationship between climate change and health. Strategic Policy S4 – Climate Change and in particular criteria ii) and viii) set out policy requirements to address the issues raised.	No change required.

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	summer and provision of trees to provide shade to reduce temperatures.		
1299 / Gloucestershire County Council / Support	Welcome the strong emphasis on sustainable transport and strong focus to ensure future developments are sustainable. Also welcome the strong focus of the RLDP to ensure future developments are sustainable.	Support welcomed.	No change required.
1356 / Welsh Government / Support	Further work on the contribution renewable energy can make to assist with climate change and decarbonisation has been undertaken with no policy objection and addresses previously submitted representations.	Comments noted.	No change required.
1412 / Natural Resource Wales (NRW) / Comment	Agree with the inclusion of a flood risk criterion, however, consider a change in the wording of criterion i) is required to avoid readers thinking that the incorporation of SuDs or resilient design in areas of risk of flooding overcomes a flood risk constraint. Incorporating SuDs and flood resilient design should be done as a matter of course and in addition to any site-specific flood risk mitigation to meet national planning policy requirements. Suggest the wording is changed to: <i>Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDs and flood resilient design. (points 59-61)</i>	Comments noted. For the reasons noted in the representation, the suggested wording change is agreed.	Change criterion i) to read: Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDs and flood resilient design.

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1412 / Natural Resource Wales (NRW) / Comment	<p>Within the reasoned justification at paragraph 9.1.5, this seems to conflate the issue of phosphates (i.e. nutrients and water quality) with water resources (i.e. water quantity and flows). Presume the objective of this paragraph, being under the climate change policy, is to highlight future risks on water resources, flows and drought. Recommend focussing on water quantity and resources in this strategic policy, while focusing on water quality and the on-going issue of nutrients in watercourses in Strategic Policy S5.</p> <p>Suggest the following wording for 9.1.5 which explains what land uses can impact on water resource and the sensitivities within these rivers and their catchments, as well as providing further clarity on the regulatory background compared to the current Deposit Plan:</p> <p><i>The River Wye and River Usk and many of their tributaries are designated as a riverine Special Area of Conservation (SAC). As a result, the habitats and species that exist there have been identified as being of a higher value and requiring more stringent river flow protection. This level of protection has been determined through a process known as the Habitats Directive Review of Consents (HDRoC). The conclusions of the River Wye and River Usk HDRoC process have been integrated with NRW's principles of Catchment Abstraction</i></p>	Comments noted. For the reasons noted in the representation, the suggested wording change is agreed.	<p>Replace paragraph 9.1.5 with the following text:</p> <p>The River Wye and River Usk and many of their tributaries are designated as a riverine Special Area of Conservation (SAC). As a result, the habitats and species that exist there have been identified as being of a higher value and requiring more stringent river flow protection. This level of protection has been determined through a process known as the Habitats Directive Review of Consents (HDRoC). The conclusions of the River Wye and River Usk HDRoC process have been integrated with NRW's principles of Catchment Abstraction Management Strategy (CAMs) to set the licensing policy on the Wye and Usk.</p> <p>The most significant abstraction pressure in the River Usk</p>

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	<p><i>Management Strategy (CAMs) to set the licensing policy on the Wye and Usk.</i></p> <p><i>The most significant abstraction pressure in the River Usk catchment is public water supply. Abstraction for this purpose accounts for approximately 94% of the catchment's total annual abstraction. The catchment is a key strategic resource for supplying potable water to much of South-East Wales and an extensive system of water transfers has been developed to distribute this water across the region. Aside from public water supply, the main pressure on water resources in the catchments is from agricultural businesses where water is required for trickle and spray irrigation and other agricultural uses. (points 63-64)</i></p>		<p>catchment is public water supply. Abstraction for this purpose accounts for approximately 94% of the catchment's total annual abstraction. The catchment is a key strategic resource for supplying potable water to much of South-East Wales and an extensive system of water transfers has been developed to distribute this water across the region. Aside from public water supply, the main pressure on water resources in the catchments is from agricultural businesses where water is required for trickle and spray irrigation and other agricultural uses.</p>
1677 / Councillor Frances Taylor / Objection	This is a primary concern, yet the interpretation of planning policy seems to offer little mitigation. The plan policies do not cumulatively mitigate against Climate change with little real offer in terms of integrated transport, community facilities and 20 minute community infrastructure.	Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery, S13 – Sustainable Transport, and S15 – Community and Recreation Facilities.	No change required.

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		Detailed Development Management policies such as NZ1 – Monmouthshire Net Zero Carbon Homes offer more detailed specifications to ensure developments reflect and contribute to the Council’s climate emergency declaration. The Plan should be considered as a whole and collectively it is considered to provide a series of policy measures aiming to address climate change consistent with national policy requirements and actions set out in the Council’s Climate and Nature Emergency Strategy.	
1803 / Councillor Dr Louise Brown / Objection	The climate change policy needs to be strengthened and is too weak in its wording and the accompanying policies on infrastructure and sewerage need to be vastly improved. It should state that developments with inadequate sewerage infrastructure likely to result in and/or add to pollution to water courses, brooks rivers and seas will be refused, and account needs to be taken of the increased likelihood of the water table rising due to increased heavy rain fall and storms due to climate change.	<p>Policy S4 sets out the Council’s overarching, strategic policy requirements to addressing the causes and impacts of climate change. This is complemented by other strategic and detailed policies through the RLDP. Policies NR1 – Nature Recovery and Geodiversity, NR3 – Protection of Water Sources and the Water Environment and PM2 – Environmental Amenity are considered to sufficiently address the concerns raised in relation to potential pollution to water courses as a result of development. In addition, Natural Resources Wales are statutory consultees on planning applications and assess proposals against its own detailed planning guidance relating to the water quality. Similarly, Dŵr Cymru Welsh Water are statutory consultees in the planning system and advise on sewerage infrastructure. Such consultation responses would be a material consideration in the determination of a planning application.</p> <p>Welsh Government’s flood risk policy is set out in Technical Advice Note 15, which is accompanied by the Flood Map for Planning. The Map displays predicted future flood risk incorporating a climate change estimate. Where relevant, development proposals will be required to provide a detailed Flood Consequences Assessment, to accompany planning applications, including the consideration of a range of climate change scenarios. It is not, therefore, considered necessary to amend the policy wording as suggested.</p>	No change required.
3118 / Councillor Meirion Howells / Support	Monmouthshire County Council declared a climate emergency in May 2019. It is important that all developments must combat the effects of climate change as a priority when considering the sustainable impact of the development.	Comments noted. In accordance with the Council’s commitment to declaring a climate and nature emergency, Policy S4 sets out the overarching policy requirements to be applied to all developments in the County to ensure the causes and impacts of climate change are considered.	No change required.

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1056 / Abergavenny Town Council / Support	Abergavenny has two rivers - the Usk and Gavenny which are defining characteristics of our town. It is essential to work towards restoring the health of these waterways, and we welcome the incorporation of water efficiency measures and minimising adverse impacts on water resources and quality.	Support welcomed.	No change required.
1138 / Raglan Community Council / Objection	In relation to the requirement to provide ULEV charging infrastructure, the RLDP does not demonstrate how the infrastructure will support the policy.	The requirement for development to provide ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality is consistent with national planning policy and Llwybr Newydd: The Wales Transport Strategy. Policy S4 and the requirement to provide ultra-low emission vehicle charging infrastructure is therefore consistent with national policy and reflects the Council's commitment to decarbonisation targets. The provision of the necessary infrastructure is a national ongoing issue, which the RLDP policy requirement feeds into.	No change required.
1138 / Raglan Community Council / Objection	Would seem from policy S4 and the IDP that DCWW does not have any concerns, but it is clear from budget restraints on both organisations they do not have the financial resource to upgrade infrastructure system. Proposed allocation HA10 will have a detrimental effect on other dwellings in Raglan without infrastructure updates.	Dŵr Cymru Welsh Water (DCWW) has been involved in the RLDP process from the outset and has provided comments on the Deposit Plan. DCWW has not identified any issues with proposed residential allocation Policy HA10 – South of Monmouth Road, Raglan.	No change required.
1367 / Abergavenny and District Civic Society / Objection	Support the aim of Policy S4 but call for clearer wording in relation to the requirement 'to address' the causes of climate change and suggest amendments. Criterion ii) is unlikely to be clear except to those experienced in the field. Also suggest an additional criterion relating to	The policy is considered to be strongly and appropriately worded requiring all developments to satisfy the policy requirements relating to climate change and lists the criteria that has to be satisfied to do so. In relation to criterion ii) relating to zero carbon energy requirements, this is supplemented by the detailed development management policy NZ1 – Monmouthshire Zero Carbon Homes, which sets out the detailed policy requirements for meeting net zero carbon homes. Further guidance on how	No change required.

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	embodied carbon released during demolition.	<p>developments will be expected to satisfy the requirements of this policy will be set out in supplementary planning guidance.</p> <p>Criterion iv) sets a requirement to utilise sustainable construction techniques. This is considered to address the suggested criterion relating to demolition.</p> <p>It is, therefore, not considered necessary to amend the policy wording as suggested.</p>	
1376 / Abergavenny Transition Town / Objection	Acknowledging the County's seriously researched investigation on sites for possible renewable wind and solar generation sites in the County, the conclusion from this and its policy implications are profoundly disturbing and should be revisited.	The RLDP's approach to local search areas is set out in the Renewable and Low Carbon Energy Assessment (RLCEA), which followed the Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (Sept 2015). The decision not to allocate local search areas was informed by a series of stakeholder workshops and interviews including with various Welsh Government departments. A key consideration is also a letter issued on the 1st March 2022 by the Minister for Climate Change, clarifying that considerable weight should be given to protecting Best and Most Versatile agricultural land in the consideration of PV array development. Given the prevalence of BMV land in Monmouthshire, this severely impacted on the ability to identify local search areas. It was, therefore, considered more appropriate to provide a robust and supportive policy framework in the RLDP against which proposals for renewable energy generation schemes will be assessed. Of note, Welsh Government has supported the approach taken in the Deposit Plan with regard to this matter.	No change required.
3602 / Llanbadoc Community Council / Objection	The dwellings in allocation HA16 will not meet the requirements of S4, criterion vii) requiring the provision of ultra-low emission vehicles charging infrastructure and will not be carbon zero homes. The planning application should be revised in line with the RLDP policies.	HA16 – Land North of Little Mill is a 'roll-over' site from the Adopted Local Development Plan (LDP), reflecting the overlap in two plans. As such, the recent planning approval on the site was assessed against the policy requirements of the Adopted LDP as the Replacement Local Development Plan (RLDP) will not come into force until formally adopted following the outcome of an Examination in Public.	No change required.
3902 / Usk Civic Society / Support	Supports the adoption of renewable energies leading to net zero carbon homes - however this needs to be factored into the cost viability of the site.	<p>Support for the policy approach is welcomed.</p> <p>In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.</p>	No change required.

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1123 / MCC Cleansing and Waste Team / Objection	This section should also include enabling recycling at home and by businesses as this is an important contribution that residents and businesses can make to reducing CO2 emissions and using the planet's resources efficiently. This includes ensuring that there is adequate storage facility in residential and commercial developments, and adequate infrastructure in the form of waste transfer stations where recyclable materials can be stored as separate waste streams. Enabling more local recycling of materials is also important in developing a more localised circular economy.	Comments notes, however, the points raised are all addressed in Strategic Policy S17 – Sustainable Waste Management. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in Policy S4.	No change required.
1301 / Melin Homes / Objection	Support the overarching aims of the policy, however, believe that this ought to be applied to new allocations within the Plan on a site by site basis. Each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.	Comments noted, however, in accordance with the Council's commitment to declaring a climate and nature emergency, the overarching policy requirements of Policy S4 are considered appropriate to be applied to all developments in the County. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in site specific policies.	No change required.
1467 / Hallam Land / Comment	In principle Hallam Land is eager to help contribute towards Monmouthshire Climate and Decarbonisation Strategy and Action Plan. The level of Hallam Land's sustainability is demonstrated through the use of sustainable modes of transport, the design of buildings and green & blue infrastructure. Support the prioritisation in S4 of fabric first as per criterion ii) and note that criteria iv) requests developments to utilise sustainable construction techniques/local supplies. However, note that the policy should be flexible and factor	<p>The commitment towards Monmouthshire's Climate and Decarbonisation Strategy and Action Plan is welcomed, along with the general support for the policy's objectives.</p> <p>The incorporation of climate change considerations into development proposals is a key policy objective of the Council. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met and the addition of 'where possible' is therefore not considered to be required. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.</p>	No change required.

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	in viability to allow developers to utilise the most appropriate technology available at that time and consider the 'where possible' an important addition.		
1480 / Edenstone Homes / Support	In principle support for the policy. Edenstone Homes intends to bring forward development associated with HA5 Land at Penlanlas in a manner which contributes towards MCC's Climate and Decarbonisation Strategy and Action Plan. However, careful consideration is needed in regard to viability to ensure the proposed site allocations such as HA5 remain deliverable to help MCC meets its housing requirement.	The commitment towards Monmouthshire's Climate and Decarbonisation Strategy and Action Plan is welcomed, along with the general support for the policy's objectives. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.	No change required.
1596 / MHA / Objection	MHA fully supports emerging policies seeking to tackle climate change with proactive sustainable measures. However, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The proposed policy, however, should be flexible to allow developers to utilise the most appropriate technology available at that time, whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.	The commitment towards Monmouthshire's Climate and Decarbonisation Strategy and Action Plan is welcomed, along with the general support for the policy's objectives. The incorporation of climate change considerations into development proposals is a key policy objective of the Council and aligns with national policy. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met and the addition of 'where possible' is therefore not considered to be required. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.	No change required.
1663 / Richborough / Objection	Paragraph 9.3.1 of the Deposit Plan notes that, in accordance with national guidance, Strategic Policy S4 seeks to steer highly vulnerable development away from flood	Paragraph 9.1.4 recognises that climate change considerations are wide-ranging and include such aspects as transport, green infrastructure and the natural environment and refers the reader other strategic policies to avoid repetition, including Strategic Policy S13 – Sustainable Transport. This policy requires development proposals to promote digital and innovative infrastructure in both	No change required.

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	risk areas. Criterion i) should be amended to reflect this wording.	urban and rural areas to enable remote access to work, education and services. It is therefore not considered necessary to add further reference to home/remote working in policy S4. Furthermore, Policy S4 relates to all forms of development, not just housing development. While it is agreed that promoting the ability to work from home has a role to play in minimising the need to travel, it only reflects one type of development and therefore it is not considered appropriate to change the wording of Policy S4.	
1663 / Richborough / Objection	Refer to criterion vi) noting the role that home/remote working can play in minimising the need to travel should also be recognised in Policy S4 or the supporting text.	<p>Following comments from NRW on the Deposit Plan reference to ‘highly vulnerable development’ in paragraph 9.3.1 is to be removed (see representations made in relation to Policy CC1). NRW note that TAN15 uses a precautionary framework which seeks to avoid all new development away from flood risk areas in the first instance. NRW’s views are that criterion i) of policy of S4 is consistent with national policy in that respect but have suggested some word changing relating to SuDs and flood resilient design.</p> <p>Criterion i) will therefore change to reflect NRW’s suggested wording and reference to ‘highly vulnerable development’ will be removed from paragraph 9.3.1.</p>	<p>Consistent with NRW’s suggested word changing amend criterion i) to read: Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDs and flood resilient design.</p> <p>Remove reference to highly vulnerable development in paragraph 9.3.1.</p>
1683 / Llanarth Estates / Objection	Support the overarching aims of the policy, however, believe that this ought to be applied to new allocations within the Plan on a site by site basis. Each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.	Support for the overarching aims of the policy is welcomed. In accordance with the Council’s commitment to declaring a climate and nature emergency, the overarching policy requirements of Policy S4 are considered appropriate to be applied to all developments in the County. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in site specific policies. Establishing overarching criteria to be applied to all development is considered to be necessary to ensure the causes and impacts of climate change are addressed from the outset. Ensuring development is resilient to	No change required.

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		climate change is a key policy objective of Welsh Government with numerous requirements set out in national planning policy. It is also a priority of the Council following its declaration of a climate and nature emergency. However, it is standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework.	
1692 / Edenstone Homes / Objection	Not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments. The substitution of 'will include' with 'may include subject to site-specific considerations' is therefore not considered to be appropriate. It is, however, standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework.	No change required.
1692 / Edenstone Homes / Comment	Any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge.	It is widely recognised that addressing climate change is a multi-agency approach including site developers, the Council, Welsh Government and residents. It is not considered necessary to set this out in the policy. This is however, clarified in the supporting text at paragraph 9.1.4, which notes that "the RLDP recognises that the sustainability issues covered by Policy S4 are only part of the solution to addressing climate change, and while the planning system has an important role to play in this agenda, actions by individuals, communities and other organisations outside of the planning system are vital."	No change required.
1736 / Bellway Homes / Comment	Support the emerging policies seeking to tackle climate change, however, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The policy should be flexible to allow developers to utilise the most appropriate technology available at that time whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.	Support for the overarching aims of the policy is welcomed. The incorporation of climate change considerations into development proposals is a key policy objective of the Council. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met and the addition of 'where possible' is therefore not considered to be required. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.	No change required.

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2416 / Edenstone Homes / Objection	Not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments. The substitution of 'will include' with 'may include subject to site-specific considerations' is therefore not considered to be appropriate. It is, however, standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework.	No change required.
2416 / Edenstone Homes / Comment	Any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge.	It is widely recognised that addressing climate change is a multi-agency approach including site developers, the Council, Welsh Government and residents. This is clarified in the supporting text at paragraph 9.1.4, which notes that "the RLDP recognises that the sustainability issues covered by Policy S4 are only part of the solution to addressing climate change, and while the planning system has an important role to play in this agenda, actions by individuals, communities and other organisations outside of the planning system are vital." It is not considered necessary to set this out in the policy.	No change required.
2419 / Edenstone Homes / Objection	Not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments. The substitution of 'will include' with 'may include subject to site-specific considerations' is therefore not considered to be appropriate. It is, however, standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework.	No change required.
2419 / Edenstone Homes / Comment	Any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge.	It is widely recognised that addressing climate change is a multi-agency approach including site developers, the Council, Welsh Government and residents. 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. It is not considered necessary to set this out in the policy.	No change required.
2951 / Tirion Homes / Objection	Support the overarching aims of the policy, however, believe that this ought to be applied to new allocations within the Plan on a site by site basis. Each allocation	Support for the overarching aims of the policy is welcomed. Establishing overarching criteria to be applied to all development is considered to be necessary to ensure the causes and impacts of climate change are addressed from the outset. Ensuring development is resilient to climate change is a key policy objective of	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	ought to set out the ways in which it will address the climate emergency with site specific criteria.	Welsh Government with numerous requirements set out in national planning policy. It is also a priority of the Council following its declaration of a climate and nature emergency. However, it is standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in the site allocation policies.	
2952 / Candleston Homes / Objection	Support the overarching aims of the policy, however, believe that this ought to be applied to new allocations within the Plan on a site by site basis. Each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.	Support for the overarching aims of the policy is welcomed. Establishing overarching criteria to be applied to all development is considered to be necessary to ensure the causes and impacts of climate change are addressed from the outset. Ensuring development is resilient to climate change is a key policy objective of Welsh Government with numerous requirements set out in national planning policy. It is also a priority of the Council following its declaration of a climate and nature emergency. However, it is standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in site specific policies.	No change required.
2954 / Sero / Objection	Support the overarching aims of the policy, however, believe that this ought to be applied to new allocations within the Plan on a site by site basis. Each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.	Support for the overarching aims of the policy is welcomed. Establishing overarching criteria to be applied to all development is considered to be necessary to ensure the causes and impacts of climate change are addressed from the outset. Ensuring development is resilient to climate change is a key policy objective of Welsh Government with numerous requirements set out in national planning policy. It is also a priority of the Council following its declaration of a climate and nature emergency. However, it is standard practice for sites to be considered on a site-by-site basis against the RLDP policy framework. The RLDP should be read as a whole with policies applied as relevant, it is therefore not considered necessary to repeat them in site specific policies.	No change required.
1366 / Carney Sweeney Ltd / Objection	Support the intention to deliver carbon neutral developments, however, the planning system is not the appropriate or best mechanism to facilitate any improvements in energy efficiency standards within homes and buildings. Buildings regs are the best vehicle to deliver these goals and keep them both	Comments noted, however, Planning Policy Wales (PPW) notes that planning authorities should assess strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon, in their development plan (paragraph 5.8.5). The benefits of such standards being operated through the Building Regulations system are recognised, however, in the meantime it is considered appropriate to require higher standards through the RLDP to meet the Welsh Government and Council's carbon emission objectives. In this respect, the requirement to consider the building fabric as part of the planning system is	No change required.

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	relevant and up to date over time. As such, criterion (ii) should be amended to read: 'Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through orientation design principles'.	considered necessary. It is, therefore, not considered appropriate to amend the policy wording as suggested.	
1383 / Taylor Wimpey / Support	Taylor Wimpey wishes to help contribute towards Monmouthshire's Climate and Decarbonisation Strategy and Action Plan. Note sustainability is at the heart of every scheme Taylor Wimpey design and delivers this is demonstrated through the use of sustainable modes of transport, the design of buildings and green & blue infrastructure. Support the prioritisation in S4 of fabric first as per criterion ii) and also note that criteria iv) requests developments to utilise sustainable construction techniques/local supplies. However, the policy should factor in viability and be flexible enough to allow developers to utilise the most appropriate technology available at that time and consider the where possible an important addition. In relation to criterion vii) Taylor Wimpey are supportive of the encouragement for the use of electric vehicles and the principle of ensuring that infrastructure is correctly implemented in new dwellings to support the ability of residents to charge electric vehicles.	<p>The commitment towards Monmouthshire's Climate and Decarbonisation Strategy and Action Plan is welcomed, along with the general support for the policy's objectives.</p> <p>The incorporation of climate change considerations into development proposals is a key policy objective of the Council. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met and the addition of 'where possible' is therefore not considered to be required.</p> <p>In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.</p>	No change required.
1739 / Save Our Unique	Welcome and support the new and updated policies dealing with the climate	Support welcomed.	No change required.

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Landscape (SOUL) / Support	emergency, green infrastructure, biodiversity and landscape.		
1410 / Mr Kevin Hall / Objection	New houses recently built in Caldicot do not have enough household parking, no solar panels nor EV charging. Concerns also noted regarding the size of the garden required to accommodate heat pumps for every house.	The houses recently constructed in the Caldicot area were assessed against the policies of the Adopted LDP, which does not require the inclusion of solar panels or ULEV charging infrastructure. In contrast and in accordance with national planning policy, the RLDP proposes to require solar panels and EV charging on new residential developments. This revised approach appropriately reflects the Council's commitment to respond to/address the climate emergency.	No change required.
1779 / Mrs Sandra Lloyd / Objection	Objects as believes there should be no development in areas at risk of flooding with no exceptions. Additionally, sustainable drainage systems should not be allowed to exit onto flood plains and flood risk areas such as with Rockfield Farm and Vinegar Hill in Undy previously.	The overarching principle of criterion i) of Policy S4 is consistent with Welsh Government's flood risk policy set out in Technical Advice Note 15. However, following comments received from Natural Resources Wales (NRW) on the Deposit Plan, the wording is recommended to be amended to avoid readers interpreting the criterion to indicate that the incorporation of SuDs or resilient design in areas of risk of flooding overcomes a flood risk constraint.	Change criterion i) to read: Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDs and flood resilient design.
1813 / Mr Jeremy Callard / Support	Full Support.	Support welcomed.	No change required.
1939 / Mr Matthew Hayes / Objection	Displacement for water will add to flooding. Loss of habitat. Loss of prime agricultural land.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, 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 jobs potential.</p>	No change required.

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2226 / Mr Gerry Moss / Objection	The new housing proposals at Caldicot-Portskewett where flooding is known to happen tells me that the Climate Emergency is not adequately appreciated.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.	No change required.
2324 / Mrs Susan Sandford / Objection	Development in Chepstow at odds with this due to increased traffic/air pollution. Options for active travel are limited due to topography. ISA report acknowledges that Moun-ton Road distance from bus and train station, shrinking network of buses and lack of frequency of bus journeys will result in predominantly reliant on use of private cars.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The spatial distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements including Chepstow. In this respect, it is considered appropriate for Chepstow to accommodate a proportion of the County's growth.</p> <p>Site specific requirements relating to the allocation at Moun-ton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Moun-ton Road, Chepstow.</p>	No change required.
2615 / Mrs Alicia Moss / Objection	9.3.1 A key effect of climate change is the risk of flooding, both in terms of the likelihood of flooding as well as the	Policy HA11 – Land East of Burrium Gate, Usk requires a scheme for the management of overland flows from adjacent land to be included to ensure existing overland flood risk has been accommodated within the layout of the site.	No change required.

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	<p>intensity of flooding. In accordance with national guidance, S4 seeks to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas of flood risk and to ensure that new development does not increase the</p> <p>risk of flooding elsewhere. By proposing the land East of Burrium Gate for building, it seems that this proposal has been ignored. Building there would greatly increase the risk of flooding elsewhere, flooding that is worsening as the rainfall increases, and which is not being addressed.</p>	<p>Further detailed comments on the flood risk management and mitigation of this site are provided in the responses to policy HA11.</p> <p>For clarification Natural Resources Wales (NRW) submitted comments on paragraph 9.3.1 of the Deposit Plan, which states ‘In accordance with national guidance, S4 seeks to steer (highly vulnerable - struck through) development away from flood risk areas.’ NRW has suggested the deletion of ‘highly vulnerable’ as national policy (TAN15) uses a precautionary framework which seeks to avoid all new development away from flood risk areas in the first instance. Paragraph 9.3.1 is proposed to be amended accordingly.</p>	
2706 / Miss Anna Chapman / Objection	<p>Net zero and environmental changes are being forced on residents too quickly. I don't agree with the changes. UK isn't ready and the technology isn't even brilliant yet. Plus, all the changes to homes including new heat pumps. Disagrees with using land to completely cover in solar panels/solar farms.</p>	<p>The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments.</p> <p>Concerns raised in relation to land coverage of solar farms is noted and reflected in criterion c) of Policy CC3 – Renewable Energy Generation, which requires that there are no unacceptable cumulative impacts in combination with existing or consented developments when considering renewable energy proposals.</p>	No change required.
2739 / Janine Amos / Objection	<p>Proper consideration should be given to the Climate and Nature Emergency. Whilst I support the design of the future building developments within themselves (low-carbon, SUDS, energy efficient, some provision for wildlife in the form of boxes and bricks etc.) at a time when we live in an unstable world we have a duty by law to protect our last green spaces and natural</p>	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p>	No change required.

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	biodiversity for future generations. We can expect more periods of heavy rainfall and the green fields are performing an important role in sequestering carbon. Paving over green sites, introducing more roads and moving people to areas where there are existing flooding issues, is short-sighted and does not meet our obligations by law.		
2942 / Mrs Nicola Johnson / Objection	Scrap them.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments.	No change required.
2981 /Mrs Nancy Webb / Support	In support of stricter suds regulations.	SuDs are managed through a separate regulatory framework and are set out in Welsh Government's Statutory Standards for Sustainable Drainage: SuDs in Wales – Designing, Constructing and Maintaining Water Drainage Systems (2018).	No change required.
3319 / Nr A Andrew Hubert von Stauffer / Objection	Our policies are consistently being overtaken by events and failure to anticipate worst case scenarios as these are becoming ever more frequent.	Comments noted. In accordance with the Council's commitment to declaring a climate and nature emergency, Policy S4 sets out the overarching policy requirements to be applied to all developments in the County to ensure the causes and impacts of climate change are considered.	No change required.
3321 / Mrs Abbie Boodeny / Objection	Adding more houses means more cars and more pollution. It will not scupper climate change.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.	No change required.
3334 / Mrs Brown / Objection	Unnecessary building on prime agricultural land is not excusable when there are so many unused properties and vacant spaces above shops within the town.	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	No change required.

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		<p>issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>An allowance is factored into the housing figures for conversions of existing units or spaces above shops and deducted from the overall housing requirement figure meaning that fewer homes are needed through new site allocations.</p> <p>Notwithstanding this, there is a need to ensure we deliver a sufficient range and choice of homes to address our local needs which results in a need to allocate land through the RLDP process.</p>	
3336 / Mrs Carolyn Chapman / Objection	Those living in affordable housing will not be able to afford to purchase new, cleaner, cars nor will many others. The majority will be driving older more polluting cars which will only exacerbate Chepstow's problems from carbon emissions and put the health of all the town's inhabitants at risk.	Site specific requirements relating to the allocation at Moun-ton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to active travel and public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Moun-ton Road, Chepstow.	No change required.
3339 / Mrs Charlotte James / Objection	Infrastructure unable to cope with the rain fall can't be ignored and the possibility that building houses on land required to soak up rain fall isn't having an impact on local flooding. Policy on sustainable drainage systems will not be implemented but the selling off land for houses will continue. The reputation of the council to sell off land for housing to the detriment of the local area can't be ignored. Doubts these policies will ever be completed.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>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.</p>	No change required.

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3340 / Mrs Cheryl Cummings / Objection	Policy targets are unachievable.	Comments noted. In accordance with the Council's commitment to declaring a climate and nature emergency, Policy S4 sets out the overarching policy requirements to be applied to all developments in the County to ensure the causes and impacts of climate change are considered.	No change required.
3345 / Anthony Pickup / Comment	It is essential that every effort is made to prevent further destruction of natural or semi-natural vegetation, so that they may assist in stripping anthropogenic atmospheric CO2. It is incumbent on Monmouthshire to avoid, destruction habitats, (be they natural woodlands, or man-made habitats like fields). Designating almost a half of its economic development area on carbon-sink land is unacceptable. Protecting Monmouthshire's "green spaces" doesn't just mean planting trees, (though this will help, of course) but means retaining what areas of natural and semi-natural habitat we have, then increasing their area, too.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. Development on the proposed employment allocations at Gwent Euro Park and Quay Point would be subject to the requirements of national planning policy with regards to biodiversity net gain and the RLDP policies set out in the Green Infrastructure, Landscape and Nature Recovery of the Plan. Further detailed comments on the mitigation associated with employment allocations EA1f – Quay Point and EA1h – Gwent Euro Park are provided in the responses to the specific policies.	No change required.
3364 / Mr David Payton / Support	Reductions in commuting and encouraging more locally available employment opportunities.	The RLDP seeks to achieve this through the allocation of a suitable range and choice of sites for industrial and business development in the County, along with a policy framework to facilitate employment generation through other sectors such as tourism, leisure, food and retail which are important to Monmouthshire's economy.	No change required.
3367 / Mr Dawson Williams / Objection	The extra houses with most people having at least two cars per household will great increase the pollution of traffic, especially when at a standstill.	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 the County's key issues including an ageing demographic and much needed affordable housing provision. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.	No change required.

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		Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.	
3377 / Mrs Edmunds / Objection	More cars more pollution.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.</p>	No change required.
3378 / Mrs Elizabeth Parnell / Objection	More buildings = more traffic = more air pollution.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging</p>	No change required.

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		infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.	
3387 / Mrs Alexis Francis-Lang / Objection	Full eco build off grid and sustainable building materials.	Criterion ii) of Policy S4 requires development proposals to incorporate low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through the design of buildings by prioritising fabric first and orientation design principles. In addition, all new residential development will be required to meet the standards set out in Policy NZ1 – Monmouthshire Net Zero Carbon Homes.	No change required.
3390 / Mr Craig / Objection	All this is going to do is create more pollution. More waste, more energy wasted, more air pollution. Potential 1500 extra cars on the road in the area.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.	No change required.
3409 / Mrs Isobel Hoare / Objection	Land in any flood plain should not even be considered for housing. Also, too much concrete laid, when gravel would help with water run off.	Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.	No change required.
3436 / Mr Christopher	Council has an agenda.	In accordance with the Council's commitment to declaring a climate and nature emergency, Policy S4 sets out the overarching policy requirements to be applied to	No change required.

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Banner / Objection		all developments in the County to ensure the causes and impacts of climate change are considered.	
3438 / Docter Alan Hudson / Objection	Increasing traffic congestion as a result of building more homes will not alleviate the problems of climate change.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.</p>	No change required.
3442 / Mr Gareth Yates / Objection	Loss of arable and agricultural land does not support net zero and reducing sustainability and food miles.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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.</p>	No change required.

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3443 / Mr Gary RockcliffeFidler-Fidler / Objection	Policies don't do enough and are quick fix solutions.	<p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the sustainability issues covered by Policy S4 are only part of the solution to addressing climate change, and while the planning system has an important role to play in this agenda, actions by individuals, communities and other organisations outside of the planning system are vital. The principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery, S13 – Sustainable Transport, and S15 – Community and Recreation Facilities.</p> <p>Detailed Development Management policies such as NZ1 – Monmouthshire Net Zero Carbon Homes offer more detailed specifications to ensure developments contribute to the Council's climate emergency declaration. The Plan should be considered as a whole and collectively it is considered to provide a series of policy measures aiming to address climate change consistent with national policy requirements and actions set out in the Council's Climate and Nature Emergency Strategy.</p>	No change required.
3444 / Mr Graham Parker / Objection	There's not enough investment from government or council into sustainable energy projects more public buildings should be adapted to energy efficient and zero carbon emissions.	The Council's action for addressing climate change is set out in its Climate and Nature Emergency Strategy including a programme of improving the energy efficiency of public buildings. Reflecting its commitment to respond to the climate emergency, the Council also owns a solar farm and is promoting an additional one through the identification of allocation CC2 – Renewable Energy Allocation on Land at Raglan Enterprise Park.	No change required.
3459 / David Gill / Objection	Requests scientific evidence on the need to tackle climate change	Ensuring development is resilient to climate change is a key policy objective of Welsh Government with numerous requirements set out in Planning Policy Wales. It is also a priority of the Council following its declaration of a climate and nature emergency. Strategic Policy S4 sets out some key considerations in addressing the causes of and adaption measures of climate change in accordance with both Welsh Government's and the Council policy position on the issue.	No change required.
3469 / Mr Andrew Orrell / Objection	This is prime agricultural land, that also serves to drain the surrounding fields. 4 acres of concrete will cause flooding.	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	No change required.

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		<p>the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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.</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 the associated supporting text.</p>	
3492 / Claire Richards / Objection	The first clause of the policy (i) should state 'No' development in areas at risk of flooding. The terms 'where appropriate' and 'minimising' makes a nonsense of the policy. Don't build in areas at risk of flooding, period. SuDS should not be allowed to expel their surface water onto areas at risk of flooding. Such as the Rockfield Farm and Vinegar Hill estates in Undy where surface water flows into the reens which cross the Gwent levels, causing floods in the recent storms.	The overarching principle of criteria i) of Policy S4 is consistent with Welsh Government's flood risk policy set out in Technical Advice Note 15. However, following comments received from Natural Resources Wales (NRW) on the Deposit Plan, the wording is recommended to be amended to avoid readers thinking that the incorporation of SuDS or resilient design in areas of risk of flooding overcomes a flood risk constraint.	Change criterion i) to read: Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDS and flood resilient design.
3493 / Mrs Julie Carr / Objection	Building on a flood plain in Usk a risk for existing properties.	Policy HA11 – Land East of Burrium Gate, Usk requires a scheme for the management of overland flood risk from adjacent land to be included to ensure existing overland flood risk has been accommodated within the layout of the site.	No change required.

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		Further detailed comments on the flood risk management and mitigation of this site are provided in the responses to policy HA11.	
3504 / Ms Alison Grenyer / Objection	Caldicot and Portskewett are surrounded by motorways. With no robust public transport provision residents will use cars more adding to the already increasing air pollution.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.</p>	No change required.
3514 / Mr Martyn Brown / Objection	There is too much focus on wind and sun and insufficient hydro given the rivers flowing in the area.	The RLDP sets out a policy framework to consider all renewable and low carbon development proposals including hydro power within Policy CC3 – Renewable Energy Generation.	No change required.
3528 / Mr John Bennett / Objection	Being built on land that would be better off being used to grow more food cheaper and grazing livestock.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address the County's key issues including an ageing demographic and much needed affordable housing provision. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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 develop of such land via a different spatial strategy. For context,</p>	No change required.

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		Monmouthshire covers an area of approximately 88,000 hectares (880 square kilometres), of which 3% is defined as 'built on'.	
3532 / Mr Nigel Haines / Objection	The net zero policy will destroy the UK economy so please stop trying to get there. The objective is laudable but will only make us poorer and will make no difference to global warming.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments as reflected in Policy S4 and supporting detailed policies.	No change required.
3534 / Ms Yvonne Lampert / Objection	They have not found any information regarding this question. It's designed to confuse people. There is not enough evidence to support climate change and building houses sustainably.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments as reflected in Policy S4 and supporting detailed policies. Details of the RLDP's climate change policies are set out in Chapter 9, with further detail on the evidence base set out in the Renewable Energy Background Paper. All documents were available to review during the consultation period at the in person drop-in sessions and on the Council's website.	No change required.
3540 / Mr Matthew Jones / Objection	Many of your climate change policies will not be met by locating land use development sites that are not located near to services and that are not accessible by sustainable means.	The spatial distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in the majority of housing growth proposed in these settlements. A lower level of growth is directed to the most sustainable lower tier settlements to deliver much needed affordable homes, to address rural inequality and rural isolation in these areas, thereby sustaining and enhancing such settlements for future generations. The availability of services and public transport provision are key considerations in the SSA and its conclusions.	No change required.
3545 / Mrs Tracy / Objection	Ridiculous.	It is not clear from the comments provided what issue is being raised. It is therefore not possible to provide a response.	No change required.
3550 / Mrs Amanda Graham / Objection	Too little too late. Areas are already experiencing flooding where it has not happened before. New homes have not been given local or national incentives to	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	No change required.

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	<p>be energy efficient. Solar ‘farms’ & ‘parks’ should be mandated for brown-field sites and warehouse roof tops. No green field site should be permitted for solar power stations. It would be good if Policy CC3 is enacted. As admitted in document - in a rural county with high levels of commuting and lack of public transport car dependency will continue. M4 access between Caldicot and Rogiet desperately needed.</p>	<p>issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. The Plan recognises that given the rural nature of Monmouthshire, travel by car may be the only realistic method of travel for some, however, development proposals are still required to accord with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and opportunities to facilitate a shift from the private car are fully considered. Site allocations reflect this approach where possible.</p> <p>With regards to the loss of greenfield land for solar farms, Policy CC3 – Renewable Energy Generation, does require developers to follow a sequential approach to site selection to demonstrate that any reasonable alternatives have been considered. The provision of on-site renewable energy generation in all new residential developments is also required under Policy NZ1 – Monmouthshire Net Zero Carbon Homes.</p> <p>New access arrangements onto the M4 are under Welsh Government’s control.</p>	
3565 / Mrs Angela Sandles / Support	<p>We need to future proof our building stock, (both new and existing) to ensure they are sustainable and do not contribute even more to our carbon emissions. I believe the plans will go some way to reducing Monmouthshire's Carbon output.</p>	<p>Comments noted.</p>	<p>No change required.</p>
3568 / Mrs Anne Moss / Objection	<p>The new housing proposals at Caldicot-Portskewett where flooding is known to happen tells me that the Climate Emergency is not adequately appreciated.</p> <p>I support renewable energy in principle but it must be undertaken with safeguards that suitably reflect the public interest</p>	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes</p>	<p>No change required.</p>

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	regarding a sustainable, society focused community.	<p>of and adapting to, climate change as per the requirements set out in the RLDP. The Plan recognises that given the rural nature of Monmouthshire, travel by car may be the only realistic method of travel for some, however, development proposals are still required to accord with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and opportunities to facilitate a shift from the private car are fully considered. Site allocations reflect this approach where possible.</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. Further detailed comments on the flood risk management and mitigation in relation to Policy HA2 – Land to the East of Caldicot/North of Portskewett, are provided in the responses to Policy HA2.</p> <p>Planning Policy Wales sets Welsh Government’s “expectation for all new renewable energy projects in Wales to include at least an element of local ownership, to retain wealth and provide real benefit to communities”.</p>	
3570 / Mr Anthony John Hall / Objection	Climate Change actions. Britain has well under 1% of global carbon generation. Other individual countries are making no attempt to restrict carbon emissions. For Britain to waste resources on carbon reductions will only cause economic and social self-destruction of the nation.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments, as reflected in Policy S4 and supporting detailed policies.	No change required.
3603 / Mr Darren / Objection	They are unproven and not delivering results in other areas. Move the location if additional housing is required.	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	No change required.

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		<p>housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The RLDP contains a Monitoring and Review chapter which will be used to assess whether the Plan's strategy, policies and proposals are being delivered.</p>	
3606 / Mr David Williams / Objection	MCC underestimate (possibly because options are limited) the significance of surface water flooding on amenity and infrastructure.	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. As set out in Policy CC1 – Sustainable Drainage Systems, the use of sustainable drainage systems (SuDs) must be an integral part of a development. Further details are set out in Policy CC1 and supporting text.	No change required.
3610 / Mr DG Spacey / Objection	The current climate change and renewable energy policies are more than likely to change so the plan should not treat these as a given.	Comments noted. Regard will be given to the relevant standards in place at the time of assessing a planning application if more stringent standards emerge through national planning policy or other regulatory systems such as Building Regulations.	No change required.
3613 / Dr Rebecca / Objection	The climate change policies lack any meaningful substance.	<p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change, reflecting national and local objectives. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery, S13 – Sustainable Transport, and S15 – Community and Recreation Facilities.</p> <p>Detailed Development Management policies such as NZ1 – Monmouthshire Net Zero Carbon Homes offer more detailed specifications to ensure developments contribute to the Council's climate emergency declaration. The Plan should be considered as a whole and collectively it is considered to provide a series of policy measures aiming to address climate change consistent with national policy requirements and actions set out in the Council's Climate and Nature Emergency Strategy.</p>	No change required.

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3623 / Mrs Erin Gaitskell / Objection	Unless all houses are built with solar panels, all building resources are ethical and green led then nothing can compare to keeping the countryside as the countryside. The wildlife already in danger will be more at risk than ever.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Detailed Development Management policies such as NZ1 – Monmouthshire Net Zero Carbon Homes offer more detailed specifications to ensure developments contribute to the Council's climate emergency declaration including the provision of on-site renewable energy generation. Policy NR1 – Nature Recovery and Geodiversity, sets out the Council's detailed policy criteria seeking to protect, positively manage and enhance Monmouthshire's biodiversity and ecosystem resilience.</p>	No change required.
3628 / Gareth Jones / Objection	Stop obsessing about green policy and build housing and amenities people actually need, e.g. doctors.	The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government and is considered appropriate and necessary in relation to all developments, as reflected in Policy S4 and supporting detailed policies.	No change required.
3634 / Dr Greg Palka / Objection	The climate change and renewable energy policies (Policies S4, NZ1, CC1, CC2, and CC3) lack sufficient emphasis on practical, location-specific measures to address the climate emergency. These proposals directly contradict the Welsh Government's commitments to achieving net-zero targets and reducing reliance on carbon-intensive infrastructure, as outlined in the **Welsh Government Roads Review**. There is a lack of enforceable requirements for developers to implement renewable energy solutions, such as solar or wind power, in new developments.	<p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery, S13 – Sustainable Transport, and S15 – Community and Recreation Facilities.</p> <p>Detailed Development Management policies such as NZ1 – Monmouthshire Net Zero Carbon Homes offer more detailed specifications to ensure developments contribute to the Council's climate emergency declaration. The Plan should be considered as a whole and collectively it is considered to provide a series of policy measures aiming to address climate change consistent with national policy</p>	No change required.

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	Without stricter guidelines, policies like CC2 fail to ensure that proposed projects meaningfully contribute to reducing emissions and promoting sustainability.	requirements and actions set out in the Council's Climate and Nature Emergency Strategy.	
3702 / Keith Plow / Objection	Let's be realistic and positive. It has to happen but it needs time and good planning over a period and money.	Comments noted. The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government.	No change required.
3736 / Mr Hugh Taylor / Support	We support these policies but feel that there is very little evidence of any current net zero features being brought forward in the county.	Development being delivered at present has been assessed against the policies of the Adopted Local Development Plan (LDP). The RLDP appropriately responds to the climate and nature emergency and once formally adopted, will become the policy framework against which new development will be assessed against, including the requirement for new homes to be net zero carbon homes.	No change required.
3745 / Mrs Jenny Carpenter / Objection	Believe that these will add construction costs that will ultimately increase property costs when Monmouthshire already has a high average property cost.	Comments noted, however, the consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government. Housing affordability is an additional key issue the Plan seeks to address and is reflected in the policy requirement for new residential allocations to provide 50% affordable homes.	No change required.
3748 / Ms Jill Bond / Support	Please also consider stipulations that all drive/patio/garden coverings should be permeable to reduce surface water run off. Use of attenuation/retention ponds is vital to increase risk of flooding of existing communities.	Comments noted. 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 the concerns raised such as drive/patio/garden coverings on residential developments.	No change required.
3749 / Ms Jill Cantor / Objection	Placing poultry units near the rivers Wye and Monnow should not be considered.	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.	No change required.

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		With regards to the impact of such developments on habitat systems 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 RE5 – Intensive Livestock/Free Range Poultry Units, NR1 - Nature Recovery and Geodiversity and NR3 - Protection of Water Sources and the Water Environment, together with a Habitats Regulations Assessment where relevant. 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.	
3752 / Mr John Major / Support	Whilst the objectives are to be recommended achievement must not become all encompassing.	Comments noted. The consideration of the causes and impacts of climate change in development proposals is a key policy objective of the Council and Welsh Government, as reflected in Policy S4 and supporting detailed policies.	No change required.
3758 / Mr Joseph Porter / Objection	The inclusion of HA4 is out of kilter with trying to tackle climate change. Water and air pollution are already at high levels. Just having zero carbon houses will not detract from those issues, given the additional cars as people won't be walking to work as there are no jobs for professionals in area, or not enough. Most people work in other towns and cities.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. Site specific requirements relating to the allocation on Land at Leasebrook, Monmouth are set out in policy HA4, which includes policy requirements relating to the concerns raised. Additional detail on these points can be found in relation to the comments received on Policy HA4 – Land at Leasebrook, Monmouth.	No change required.
3760 / Miss Julia Brown / Objection	We are drowning in pollution. This will add to it. Clean up the river and roads first.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The	No change required.

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		RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. The policy approach includes addressing water pollution and water quality issues in collaboration with Natural Resources Wales and Dŵr Cymru Welsh Water and minimising the need to travel and maximising opportunities for sustainable travel through policy requirements for active travel improvements and electric vehicle charging infrastructure.	
3803 / Ms Lucy Hoare / Objection	Ensure new homes in Monmouth are built well clear of the river.	The site selection process has had full regard to the policy requirements of Welsh Government's flood risk policy set out in Planning Policy Wales and Technical Advice Note 15 and has been used to help inform the spatial strategy and the identification of areas most suitable for development. In addition, all allocations will be required to be approved by the Sustainable Drainage Approving Body (SAB).	No change required.
3808 / Ms M K Annandale / Objection	We are doing too little too late because you don't understand what an energetic climate means. If you did you would ever think to build in a flood zone.	The site selection process has had full regard to the policy requirements of Welsh Government's flood risk policy set out in Planning Policy Wales and Technical Advice Note 15 and has been used to help inform the spatial strategy and the identification of areas most suitable for development. In addition, all allocations will be required to be approved by the Sustainable Drainage Approving Body (SAB).	No change required.
3845 / Mr Martin Sweeney / Support	I am in support of both the climate change and renewable energy policies as outlined, but would note that the choice of candidate site CS0270 (residential only) in Monmouth over site CS0274 (for mixed employment and residential) is contrary to strategic policy S4 vi) "Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel;" given that mixed use at CS0274 has been ruled out in the proposed RLDP.	Support for the climate change and renewable energy policies is welcomed. Site specific requirements relating to the allocation on Land at Leasebrook, Monmouth are set out in policy HA4. Additional details on these points can be found in relation to the comments received on Policy HA4 – Land at Leasebrook, Monmouth. With regards to CS0274 – Land north of Wonastow Road, Monmouth, this site is not allocated for residential use as there is sufficient and more suitable land available within Monmouth to accommodate its housing need. Part of the site is, however, considered appropriate for B1/B2/B8 employment uses as it forms a logical extension to adjoining employment uses and would provide much needed employment land in Monmouth. It is therefore proposed to be allocated for employment use under policy EA1.	No change required.

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3850 / Mr Maurice Burns / Objection	People who move in will need work to pay for their homes. That means travelling as the jobs will not be local. Travel results in pollution which is counter to renewable energy policy as in the short term this will be by use of fossil fuels.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. The policy approach includes minimising the need to travel and maximising opportunities for sustainable travel through policy requirements for active travel improvements and electric vehicle charging infrastructure. Furthermore, given the 50% affordable housing policy requirement many of these people are already living and working in the area.	No change required.
3867 / Mr /Mrs White / Objection	No thought has been given to the aging population which will need more than cycle tracks and footpaths in this hilly area. Pollution in Hardwick Hill and Pwllmeyric Hill is already above the legal limits. Exhaust fumes from gridlocked traffic in these areas will add to carbon footprints etc of Monmouthshire.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The spatial distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements including Chepstow. In this respect, it is considered appropriate for Chepstow to accommodate a proportion of the County's growth.</p> <p>Site specific requirements relating to the allocation at Mounton Road, Chepstow are set out in Policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality</p>	No change required.

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		measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounon Road, Chepstow.	
3870 / Mr Klinkert / Objection	All the extra cars going towards Chepstow and queuing on Pwllmeyric Hill will be bad for the environment.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The spatial distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements including Chepstow. In this respect, it is considered appropriate for Chepstow to accommodate a proportion of the County's growth.</p> <p>Site specific requirements relating to the allocation at Mounon Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounon Road, Chepstow.</p>	No change required.
3871 / Mr L Llewellyn / Objection	Does not support any development near the Larkfield roundabout as per my previous comments on local car pollution/ congestion. I would support schemes where car pollution data is monitored live and openly made available to the public. I would support introducing road tolls, or congestion charges, for all pass-through traffic entering Wales from Gloucester (commuters to Bristol but polluting	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.	No change required.

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	<p>Chepstow as a result). I would support road tolls on the M4 link road for all cars with only 1 x person at peak times.</p> <p>I would support measures that temporarily stop all traffic passing through Chepstow when pollution limits are exceeded (like pollution traffic lights).</p> <p>Please also note: I do not believe the adoption of all electric cars will happen in sufficient numbers before 2030 therefore other forceful measures should be considered. Continued expansion of affordable public transport schemes should be promoted as the main solution.</p>	<p>The spatial distribution of growth throughout the County reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements including Chepstow. In this respect, it is considered appropriate for Chepstow to accommodate a proportion of the County's growth.</p> <p>Many of the suggestions noted are outside the scope of the RLDP, however, site specific requirements relating to the allocation at Mounton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounton Road, Chepstow.</p>	
3873 / Mr V G Danks / Support	S4 makes sense in the current circumstances if the developers actually comply with it.	Comments noted. In accordance with Policy S4, all development proposals will be required to address the causes of, and adapt to the impacts of, climate change.	No change required.
3886 / Mrs Nerys Wilson / Comment	Must be implemented sensitively in conservation areas to balance with preservation of CAs.	Comments noted. Development proposals will be required to meet the requirements of all relevant policies of the Plan and other regulations, including those that seek to preserve and enhance the historic environment.	No change required.
3894 / Mrs P A Davies / Objection	More building = more traffic, more pollution, more liability for flooding. Wildlife needs a home too - do we not care about the extinction of so many species?	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging</p>	No change required.

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		and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery and S13 – Sustainable Transport.	
3896 / Mrs Pamela Williams / Objection	It's all very well building houses that are energy efficient but what about the extra number of cars that will be in the area and also the extra sewerage and waste water that is already clogging up the reën.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery and S13 – Sustainable Transport.</p>	No change required.
3904 / Mr Peter Garwood / Objection	Climate change means we will need to reduce building in areas that will cause run off of water.	Comments noted. 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.	No change required.
3909 / Mr Piers Jacobs / Objection	Needs to be retracted and expanded. There is no reference to active travel (only sustainable) - there needs to be greater focus on walking and cycling, not just electric vehicles and public transport. What about car clubs and other measures?	Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies,	No change required.

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	Provision of viable travel alternatives for people and should be a key element of climate change mitigation. There should also be reference to connectivity and travel behaviour change. The Council should review best practice policies for climate change policies from other local authorities.	including S5 – Green Infrastructure, Landscape and Nature Recovery, S13 – Sustainable Transport, and S15 – Community and Recreation Facilities. With regards to broader sustainable transport considerations, policy S13 – Sustainable Transport, sets out further detailed requirements including active travel. Measures such as car clubs are supported but are not implemented through the planning system.	
3924 / Mr Richard Dobbin / Objection	It has a lot of aspirations which can't be influenced by MCC. The house building will create additional CO2 from their construction and traffic congestion. Will all these homes be built to higher insulation standards? The house building is encouraging Bristol commuters to live here as it is cheaper. Improvements are needed for public transport for CO2 reduction.	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. Policy NZ1 – Monmouthshire Net Zero Carbon Homes, requires all new homes to be built net zero standards including building fabric requirements. Comments noted regarding improvements to public transport, developers will be required to contribute to improvements as necessary.	No change required.
3934 / Mr Robert Montgomery / Objection	What have Mon CC done to improve air quality in Chepstow? UK-AIR ID UKA00515 shows very high readings.	Monmouthshire County Council' Environmental Health section undertakes assessments of the air quality within the County at specific locations that might be at risk of having high levels of pollution, including Chepstow. The data is analysed and published in an annual progress report including an action plan to address air quality issues. Further details can be viewed in the 2024 Air Quality Progress Report (Sept 2024). Further details can be viewed in the 2024 Air Quality Progress Report (Sept 2024). The installation of burning stoves is not regulated through the planning system. A policy in the RLDP is therefore not appropriate.	No change required.
3941 / Mr & Mrs Ruth-Olivia &	More thought and change to environment and to protect green spaces and wildlife.	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	No change required.

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David. L. Prosser / Objection		<p>the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Strategic Policy S4 is an overarching policy establishing some key considerations in addressing the causes of and adaption measures of climate change. Paragraph 9.1.4 recognises that the principles of sustainable development are wide-ranging and include other factors including transport, green infrastructure and the natural environment. These issues are dealt within the Plan's other strategic policies, including S5 – Green Infrastructure, Landscape and Nature Recovery and S13 – Sustainable Transport.</p>	
3943 / Mrs S Billington / Objection	It is frightening the amount of green land being built on. Concerned about the increase in flooding.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. For context, Monmouthshire covers an area of approximately 88,000 hectares (880 square kilometres), of which 3% is defined as 'built on'.</p> <p>As noted in paragraph 9.3.4 of the RLDP, the site selection process has had full regard to the policy requirements of Welsh Government's flood risk policy set out in Planning Policy Wales and Technical Advice Note 15 and has been used to inform the spatial strategy and the identification of areas most suitable for development. In addition, all allocations will be required to be approved by the Sustainable Drainage Approving Body (SAB).</p>	No change required.
3944 / Mrs Sally Benitez / Objection	Can you publicly show how this will help with sustainability and climate change as you will be adding more vehicles on the	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	No change required.

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	<p>roads so there will be more pollution, Chepstow area is already one of the highest areas of pollution and has been for over 10 years and is getting worse not better as nothing has been done to rectify the problem and this will cause ill health in people i.e. asthma and eczema and other chest problems.</p>	<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP. Policy S4 – Climate Change and other complementary RLDP policies including NZ1 – Monmouthshire Net Zero Carbon Homes and Strategic Policy S13 – Sustainable Transport include a requirement for new houses to have ULEV charging infrastructure to support the switch to electric vehicles, and the incorporation of active travel and public transport links to support /encourage the modal shift from car to alternative transportation methods.</p> <p>Monmouthshire County Council' Environmental Health section undertakes assessments of the air quality within the County at specific locations that might be at risk of having high levels of pollution, including Chepstow. The data is analysed and published in an annual progress report including an action plan to address air quality issues. Further details can be viewed in the 2024 Air Quality Progress Report (Sept 2024).</p> <p>Site specific requirements relating to the allocation at Moun-ton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Moun-ton Road, Chepstow.</p>	
3949 / Mrs Sarah Spencer / Objection	<p>How on earth can you have a climate change policy when you want to build 770 new houses on one greenfield farming site?</p>	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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</p>	No change required.

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		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.	
3966 / Mr Steve Lamb / Objection	<p>In S4 and CC1, the Council states that it is committed to implementing a sustainable approach to surface water drainage and expects development to incorporate Sustainable Drainage Systems (SuDS) wherever possible. The proposed site CS0113 has future issues for the surrounding community with surface water drainage. At present, when storms occur, there are significant challenges for existing infrastructure to cope with the volume of water.</p> <p>The question has been made to the Planning policy team for waterflow calculations for this proposed site and that of the declined site CS0282 to understand what impact i.e. calculations, of expected surface water flow from both sites. Given the topography of the adjoining land both would need to be know. This information is not been made available. If this information is not available for this site has it been made for all other proposed sites in the MCC area?</p>	Policy HA11 – Land East of Burrium Gate, Usk requires a scheme for the management of overland flows from adjacent land to be included to ensure existing overland flood risk has been accommodated within the layout of the site. Further detailed comments on the flood risk management and mitigation of this site are provided in the responses to policy HA11. Requests for information on the waterflow calculations have been advised to contact the Flood Risk Team for further details.	No change required.
3971 / Miss Sue Netherway / Objection	It is stated that houses built will be 'net zero'. I suspect this cannot be true. How can offering homes to potentially up to 400 car owners, over 200 dogs and cats, users of an overloaded sewage system etc, etc, with run off of water into the river Wye	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as	No change required.

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	have any possible consequence of not contributing to climate change?	<p>sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Policy NZ1 – Monmouthshire Net Zero Carbon Homes, sets out the standards new homes will be required to meet to ensure new homes are built to the highest energy efficiency standards and utilise renewable energy sources for their heating, hot water and lighting energy needs.</p>	
3972 / Mrs Sue Young / Objection	<p>Caldicot Castle grounds already flood during heavy rainfall, current water management is insufficient, will this be further impacted by the new development?</p> <p>It is not clear how the climate change and renewable energy policies apply to the travellers site.</p> <p>Table 3 Renewable Energy targets - Why only 2500 - 3000 roof mounted solar panels and heat pumps when 6210 new properties are being developed? Surely 4080 homes in landbank should have to incorporate these features and if planning permission has already been granted and the company is 'sitting on' the development, plans should need to be updated.</p>	<p>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. The Council is committed to implementing surface water drainage and expects development to incorporate sustainable drainage systems into proposals as required by the national standards. Further detailed comments on the flood risk management and mitigation of HA2 – Land to the East of Caldicot/North of Portskewett, are provided in the responses to policy HA2.</p> <p>Policy S4 applies to all development in the County including the Gypsy and Traveller allocation and any other proposals that come forward.</p> <p>With regards to the renewable energy targets relating to approximately 2,500 – 3,000 roof mounted solar panels and heat pumps, this figure reflects the level of homes already delivered in the Plan period, which cannot therefore be factored into the target. For example, the RLDP proposes to make provision for 6,210 homes to meet a housing requirement of 5,400. However, as the period runs from 2018, approximately 3,000 homes have already been built or agreed via the planning application system. The low and high targets noted in Table 2 of the Deposit Plan therefore reflect an element of flexibility to allow for delivery rates and a suitability factor for roof top solar and heat pumps to be considered i.e. not all new properties are suitable for solar panels due to orientation etc.</p>	No change required.
3984 / Mr Tim Monckton / Objection	HA1 seems at odds with your stated climate emergency/land recovery position. They are building on countryside/farm land. Other land in Abergavenny is limited,	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The	No change required.

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	but you should be looking at other more appropriate sites.	<p>RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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.</p>	
3989 / Miss Tracey Meaker / Objection	What happens to the wildlife?	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Impact on wildlife and biodiversity will be assessed through Planning Policy Wales and Policy NR1 – Nature Recovery and Geodiversity. In accordance with Chapter 6 of Planning Policy Wales planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.</p>	No change required.
3995 / Mrs Victoria Clark / Objection	How is it helping climate change building on every bit of green. We want some countryside left.	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as</p>	No change required.

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		<p>sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</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. For context, Monmouthshire covers an area of approximately 88,000 hectares (880 square kilometres), of which 3% is defined as 'built on'.</p>	

Policy NZ1 – Monmouthshire Net Zero Carbon Homes

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1196 / Torfaen County Borough Council / Support	The relatively high land values in Monmouthshire should assist in supporting the ambition of exemplar zero carbon quality development; which is applauded. Torfaen would be interested in continuing to work with Monmouthshire to understand the details of the viability work that supports this ambition and sharing knowledge and assumptions behind the policy.	Support welcomed. Collaborative discussions and knowledge sharing on the policy approach is welcomed.	No change required.
1299 / Gloucestershire County Council / Comment	Suggest the scope of NZ1 could be extended to include non-residential development.	In terms of non-residential development, due to the wide range of typologies and scales of development requiring assessment to build an evidence base for widening the policy to non-residential development, it was not considered practical or feasible to progress this for the current RLDP.	No change required.
1299 / Gloucestershire County Council / Comment	Suggest NZ1 could benefit from further clarification on whether the charging infrastructure is just cabling, or the charging connection point itself.	Comments noted.	No change required.
1677 / Councillor Frances Taylor / Objection	Much has been made of net zero aspirations, however, the RLDP does not propose the same restrictions on industrial or public development. All industrial and public development approval should be conditional on the provision of on site low impact on the environment renewable energy generation. All on-site options must be fulfilled before a developer can be allowed to seek permission to develop renewable power sources off-site. To this end it should be a planning condition that	Comments noted. In terms of non-residential development, due to the wide range of typologies and scales of development requiring assessment to build an evidence base for widening the policy to non-residential development, it was not considered practical or feasible to progress this for the current RLDP. Of note, supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1.	No change required.

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	the roofs of all new development be designed to support solar panels.		
1803 / Councillor Dr Louise Brown / Objection	There needs to be policy of net zero to apply to new build employment and industrial buildings as well.	Comments noted. In terms of non-residential development, due to the wide range of typologies and scales of development requiring assessment to build an evidence base for widening the policy to non-residential development, it was not considered practical or feasible to progress this for the current RLDP.	No change required.
2505 / Councillor Steven Garratt / Support	Need urgent action to start building new sustainable homes. Retrofitting is not the sole answer. No new home should be built unless they are net zero and off the fossil fuel grid.	Comments noted. Policy NZ1 requires that new homes are built to the highest energy efficiency standards and utilise renewable energy sources for their 'regulated energy' (heating, hot water, lighting).	No change required.
3118 / Councillor Meirion Howells / Support	I support this net zero homes policy. Homes should seek to balance its essential operational running costs from renewable energy sources and ensure the building fabric is to the highest performance rate A standard. I support that new homes must not be connected to the gas grid and that energy use should be met by low carbon systems.	Support noted.	No change required.
1255 / Home Builders Federation (HBF) / Objection	Objects to the principle of the LDP being used to impose building standard requirements over and above national policies contained within Building Regulations. The proposed standard is likely to affect SME developers disproportionately. Also concerned there is a lack of resource including knowledge and experience available to implement the policy.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The policy approach of requiring higher standards for all new residential development to meet the Welsh</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes). Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Of note, there is a burgeoning community of low energy consultants and designers both within and adjacent to the South Wales region, growing through acceptance of PHPP metrics for SHG and the Tai ar y Cyd collaboration between Welsh Government and 23 social housing providers mandating it as the base specification for delivery of the pattern book. Welsh Government are funding Net Zero training for businesses through the Flexible Skills Programme and the Construction Industry Training Board (CITB) are also facilitating funding for training, reskilling and upskilling in low energy and net zero construction processes.</p>	
1367 / Abergavenny and District Civic Society / Comment	Do not have the expertise to comment on the details of welcomed Policy NZ1 but recommend careful consideration of the submission of a local architect who has that expertise. The policy needs to be clear whether it also applies to home extensions that are not permitted development. The LPA will also need to have access to the expertise required to apply the policy.	Comments noted. Policy NZ1 is clearly defined as applying to the creation of new homes and not extensions or additions to existing. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1376 / Abergavenny Transition Town / Objection	<p>The requirement for all developments to submit a full operational energy strategy is very good. A full SAP/HEM aligned assessment would be an option and should be prepared by a qualified named professional/the principal designer. Detailed comments provided on the technical aspects of the policy along with some suggested changes. Policy hasn't gone far enough with respect to monitoring or potential enforceable legal financial penalties.</p>	<p>As the conclusions of Etude Making SAP and RdSAP 11 fit for Net Zero (2021) the Standard Assessment Procedure (SAP) is not considered an accurate tool for calculating the operational performance of homes. RICS Whole life carbon assessment for the built environment v2 (2023) explicitly excludes the use of SAP calculations prepared for Approved Document L (Wales) 2022 for operational energy assessments. While a SAP conversion tool has been developed for Bath & North East Somerset and Cornwall Councils to assist implementation of their own Net Zero policy, it has only been verified for their specific climate regions and adjusting this for Monmouthshire would require additional capital expense by MCC.</p> <p>As HEM is still in development and yet to be released the reliability of output from its final, adopted form cannot be established.</p> <p>Alignment with RICS WLCA methodology ensures the policy remains relevant and reflective of emerging softwares and calculation methodologies deemed suitable for calculating operational energy consumption. Recommendation for operational energy assessments to be prepared by a qualified and named professional is acknowledged.</p> <p>It is not considered necessary to provide further definition of onsite renewables by referring specifically to electricity. It is considered that the policy is sufficiently clear in this respect.</p> <p>Comments regarding monitoring and financial penalties are noted. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1.</p>	No change required.
3602 / Llanbadoc Community Council / Objection	<p>While the plan sets out strict and clear policies to meet the target for Net Zero, these policies are ambitious given the infrastructure in the area. The RLDP does not allow plans to deviate from implementing these strict policies should the Net Zero target be moved. Request further details are set out to make the plan more deliverable, for example, a more</p>	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the</p>	No change required.

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	flexible approach to the delivery of the Net Zero target.	<p>Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain.</p> <p>Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Of note, there is a burgeoning community of low energy consultants and designers both within and adjacent to the South Wales region, growing through acceptance of PHPP metrics for SHG and the Tai ar y Cyd collaboration between Welsh Government and 23 social housing providers mandating it as the base specification for delivery of the pattern book. Welsh Government are funding Net Zero training for businesses through the Flexible Skills Programme and the Construction Industry Training Board (CITB) are also facilitating funding for training, reskilling and upskilling in low energy and net zero construction processes.</p>	
1281 / Barratt David Wilson Homes / Objection	Object to the wording of NZ1 in its present form. Further clarification is sought on what would need to be included in 'as-built performance survey' as there is no detail in the draft policy (Q6)	<p>With regard to policy implementation, MCC has undertaken considerable consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys'. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p>	No change required.

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1301 / Melin Homes / Support	Supportive of the approach and note that the proposal for a new settlement (CS0224) demonstrate what is achievable to create a truly zero carbon community. This is possible due to the scale of the proposal. Propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity.	Support noted. The proposal for a new settlement at Cwm Pentref (CS0224) is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales. Further detail on this candidate site is set out in the relevant section of the Consultation Report and Candidate Sites Assessment Report.	No change required.
1467 / Hallam Land / Objection	Whilst recognise the ambition of NZ1 question the need to step beyond the Future Housing Standards. Suggest applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of PPW. Consider the scope of NZ1 needs to be amended to align with national guidance, whilst also reflecting Future Housing Standards.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. It is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain.</p>	No change required.
1480 / Edenstone Homes / Objection	Support the overarching ambition of NZ1 however have several concerns regarding the practical implementation and implications of the policy. Detailed	Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively	No change required.

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	<p>comments provided. Overall, the policy is inconsistent with paragraph 5.8.5 of PPW which directs such targets to strategic sites. A more targeted and consistent approach, aligned with national policy would ensure the delivery of homes without compromising on viability. Should reconsider the scope of NZ1 to align with national policy.</p>	<p>address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The feasibility and viability of the policy have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes). Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Of note, there is a burgeoning community of low energy consultants and designers both within and adjacent to the South Wales region, growing through acceptance of PHPP metrics for SHG and the Tai ar y Cyd collaboration between Welsh Government and 23 social housing providers mandating it as the base specification for delivery of the pattern book. Welsh Government are funding Net Zero training for businesses through the Flexible Skills Programme and the Construction Industry Training Board (CITB) are also facilitating funding for training, reskilling and upskilling in low energy and net zero construction processes.</p>	
1503 / Redrow Homes (South	Do not consider it possible to provide all of the information required to demonstrate compliance with Policy NZ1 at outline	Comments noted. High-level energy modelling could be undertaken applying a Notional Specification and general layout principles as with the assessments undertaken to demonstrate technical feasibility. Supplementary planning guidance	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Wales) Limited / Objection	planning stage, state the information requirements can only be expected to be provided at the detailed reserved matters stage.	(SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1.	
1503 / Redrow Homes (South Wales) Limited / Objection	Regarding space heating demand it is considered further information needs to be provided to developers on how the LPA intends to measure space heating demand as without detailed guidance it is not possible to say whether this target is achievable or not. Require clarity on where the measurement point begins.	Comments noted. Space heating demand refers to a specific and consistently calculated output by various operational energy assessment methodologies. Heat losses and gains are calculated for a building on an annual basis to generate the energy balance. Space heating demand is the heat required to be actively input into the system to 'top up' the difference between heat losses and heat gains as measured in kWh/m ² TFA/yr. Space heating demand does not account for the efficiency or inefficiency of heating systems. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1.	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Suggest the EPC A requirement be amended to EPC B to ensure that Policy NZ1 can deliver the homes Monmouthshire needs as new build homes typically achieve an EPC rating of B.	Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1. Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The feasibility and viability of the policy have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions. With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly	No change required.

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		<p>delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes).</p> <p>Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1.</p>	
1503 / Redrow Homes (South Wales) Limited / Objection	State reference to ULEV charging infrastructure could be removed from NZ1 as this will be included in upcoming Building Regulations legislation.	Comments noted. Policy NZ1 reflects that there are no timescales for the adoption of Approved Document S (Wales). It is, therefore, considered appropriate to include reference to ULEV charging infrastructure in the policy.	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Further guidance is required on what the LPA is expecting in relation to the submission of a built performance summary. Concerns that an initiative to give preferential branding or certification to homes that were tested may negatively impact the marketing of homes that are not tested.	<p>Commented noted. 'As-built performance survey' could be clarified as an as-built energy assessment/ model/ report of the homes reflecting the construction specification delivered on site</p> <p>and information such as the achieved air permeability. Further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys', will be set out in supplementary planning guidance (SPG).</p> <p>Certification offers the opportunity for developers to promote quality assured housing products that can leverage higher sales values. This should be perceived as a potential competitive advantage for those willing to engage.</p>	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Should be some flexibility for the requirements of Policy NZ1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy NZ1 during the lifetime of the RLDP.	Comments noted. It is considered that if Planning Policy Wales and/ or Building Regulations exceed the requirements of Policy NZ1 then developers will be able to easily demonstrate compliance.	No change required.
1683 / Llanarth Estates / Support	Supportive of the approach and note that the proposal for a new settlement (CS0224) demonstrate what is achievable to create a truly zero carbon community. This is possible due to the scale of the proposal. Propose that bio-gas will be	Support noted. The proposal for a new settlement at Cwm Pentref (CS0224) is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales. Further detail on this candidate site is set out in the relevant section of the Consultation Report and Candidate Sites Assessment Report.	No change required.

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	generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity.		
1692 / Edenstone Homes / Objection	Several concerns regarding the practical implementation and implications of the policy as currently drafted: Conflict with National Policy; Feasibility and Viability; consistency and complexity across local authorities; Practical challenges in implementation; Public perception and communication; Performance gap and compliance costs; and a call for a nationally consistent approach.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes).</p> <p>Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. As such, the proposed policy position is considered appropriate and proportionate for its context given the higher land and sales values in Monmouthshire.</p> <p>Numerous precedents of such policy interventions in England have not generated any significant practical challenges in implementation. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Compliance costs should be relatively low given the interaction with Policy S7 Affordable Housing. With 50% of all new build housing required to be social, and most social housing providers operating in Monmouthshire being members of Tai ar y Cyd, PHPP modelling will be a regular feature for Welsh Government Technical Scrutiny at concept and pre-planning stages. As one of the accepted tools for operational energy assessment under current RICS WLCA methodology, PHPP calculations would be equally applicable to demonstrate compliance with policy: increasing the scope for energy modelling from 50% to 100% of dwellings on a site should leverage economies of scale.</p> <p>Call for a nationally consistent approach is acknowledged. Halfway through the 'Decade of Action' and in lieu of significant progression by central government, MCC have – as above – been compelled to act on the issue.</p>	
1736 / Bellway Homes / Objection	<p>Future Housing Standards (FHS) is due to be implemented in 2025 aiming to eliminate dwellings' reliance on fossil fuels, instead using low carbon energy sources. Bellway will clearly comply with these regulations and national requirements and question the need to currently step beyond the FHS. Applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of PPW, which directs such higher standards only strategic sites.</p>	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. It is considered that feasibility and viability of this policy have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the</p>	No change required.

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		capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes).	
1965 / Monmouthshire Housing Association (MHA) / Objection	<p>In principle, MHA are supportive of the policy regarding the provision of net zero carbon homes. The proposed wording of Policy NZ1 will require homes to be constructed to a higher standard than Part L 2022 (Appendix E). This is supported in principle given that all of MHA's land-led developments (since 2021) are already achieving Part L 2022 (Appendix E) as a minimum and have achieved +100 SAP on the most recent homes.</p> <p>There are, however, elements of the policy which MHA object to as set out in the representations below.</p>	Support noted.	No change required.
1965 / Monmouthshire Housing Association (MHA) / Objection	<p>Energy Generation: space heating demand in first bullet point is considered acceptable. However, object to the requirement to generate at 40kWh/m²/yr. Small houses and flats may not have the roof space to get enough solar panels on the roof which would have a direct impact on the ability to generate this much energy. This policy requirement is too restrictive and may prevent certain development/house types coming forward.</p>	<p>Comments noted. Technical feasibility, as set out in the RLDP evidence base, demonstrates that 40 kWh/m²p//yr generation potential is easily accommodated across the assessed typologies. Applying the metric of m² of building footprint rather than m² of gross internal area, means that apartments are not disproportionately impacted. The 3-storey HT 211 typology demonstrates capacity for a photovoltaic array in excess of 120 kWh/m²fp/yr: HT 421 has capacity for an array exceeding 80 kWh/m²fp/yr. As such, the policy is not considered too restrictive or prevent certain development/house types coming forward.</p>	No change required.
1965 / Monmouthshire Housing	<p>Performance Survey prior to occupation is too restrictive and needs further detailed consideration as to practicalities of</p>	<p>Comments noted. However, as the representation notes, all of the necessary information should have been collated by the developer for the BRWL report. 'As-built performance survey' could be clarified as an as-built energy assessment/</p>	No change required.

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Association (MHA) / Objection	introducing this as a requirement. The SAP Assessment and Building Control compliance certificate are already available to the LPA as part of building Control approval. Any requirement for a performance survey required prior to occupation would not be necessary and would add further delay and further cost.	model/ report of the homes reflecting the construction specification delivered on site and information such as the achieved air permeability. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys'.	
1965 / Monmouthshire Housing Association (MHA) / Objection	Energy Assessment: -MHA object to the requirement to submit a 'RICS aligned operational' Energy Assessment and request its removal. RICS do not allow the use of national calculation methodology in Whole Life Carbon Assessments (referenced elsewhere in policy). Whole life carbon refers to the carbon impacts over the entire life cycle of a built asset, from construction through to its end of life. Policy wording should be amended to require the submission of an 'Energy Assessment'.	As the conclusions of Etude Making SAP and RdSAP 11 fit for Net Zero (2021) the Standard Assessment Procedure (SAP) is not considered an accurate tool for calculating the operational performance of homes. RICS Whole life carbon assessment for the built environment v2 (2023) explicitly excludes the use of SAP calculations prepared for Approved Document L (Wales) 2022 for operational energy assessments. While a SAP conversion tool has been developed for Bath & North East Somerset and Cornwall Councils to assist implementation of their own net zero policies, it has only been verified for their specific climate regions and adjusting this for Monmouthshire would require additional capital expense by MCC. As HEM is still in development and yet to be released the reliability of output from its final, adopted form cannot be established. Alignment with RICS WLCA methodology ensures the policy remains relevant and reflective of emerging softwares and calculation methodologies deemed suitable for calculating operational energy consumption. Interaction with Policy S7 Affordable Housing should also be considered as any development implementing Tai ar y Cyd will be modelled using PHPP, one of the accepted tools for operational energy assessment under current RICS WLCA methodology. It is, therefore, not considered appropriate to amend the policy wording as suggested.	No change required.
2416 / Edenstone Homes / Objection	Several concerns regarding the practical implementation and implications of the policy as currently drafted: Conflict with National Policy; Feasibility and Viability; consistency and complexity across local authorities; Practical challenges in	Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.	No change required.

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	<p>implementation; Public perception and communication; Performance gap and compliance costs; and a call for a nationally consistent approach.</p>	<p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes).</p> <p>Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. As such, the proposed policy position is considered appropriate and proportionate for its context given the higher land and sales values in Monmouthshire.</p> <p>Numerous precedents of such policy interventions in England have not generated any significant practical challenges in implementation. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Compliance costs should be relatively low given the interaction with Policy S7 Affordable Housing. With 50% of all new build housing required to be social, and most social housing providers operating in Monmouthshire being members of Tai ar y Cyd, PHPP modelling will be a regular feature for Welsh Government Technical Scrutiny at concept and pre-planning stages. As one of the accepted tools for operational energy assessment under current RICS WLCA methodology, PHPP calculations would be equally applicable to demonstrate compliance with policy:</p>	

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		<p>increasing the scope for energy modelling from 50% to 100% of dwellings on a site should leverage economies of scale.</p> <p>Call for a nationally consistent approach is acknowledged. Halfway through the 'Decade of Action' and in lieu of significant progression by central government, MCC have – as above – been compelled to act on the issue.</p>	
2419 / Edenstone Homes / Objection	Several concerns regarding the practical implementation and implications of the policy as currently drafted: Conflict with National Policy; Feasibility and Viability; consistency and complexity across local authorities; Practical challenges in implementation; Public perception and communication; Performance gap and compliance costs; and a call for a nationally consistent approach.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. SME developers are those most commonly delivering projects to enhanced standards. This offers the opportunity to develop the specialisation as a USP to grow (e.g. MWP, PassiFrame or PyC) and unique housing product that can leverage higher sales values (e.g. Octopus Zero Bills Homes).</p> <p>Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. As such, the proposed policy position is considered appropriate and proportionate for its context given the higher land and sales values in Monmouthshire.</p> <p>Numerous precedents of such policy interventions in England have not generated any significant practical challenges in implementation. Supplementary planning</p>	No change required.

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		<p>guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.</p> <p>Compliance costs should be relatively low given the interaction with Policy S7 Affordable Housing. With 50% of all new build housing required to be social, and most social housing providers operating in Monmouthshire being members of Tai ar y Cyd, PHPP modelling will be a regular feature for Welsh Government Technical Scrutiny at concept and pre-planning stages. As one of the accepted tools for operational energy assessment under current RICS WLCA methodology, PHPP calculations would be equally applicable to demonstrate compliance with policy: increasing the scope for energy modelling from 50% to 100% of dwellings on a site should leverage economies of scale.</p> <p>Call for a nationally consistent approach is acknowledged. Halfway through the 'Decade of Action' and in lieu of significant progression by central government, MCC have – as above – been compelled to act on the issue.</p>	
2463 / Barwood Development Securities Ltd / Objection	<p>Support the Council's intention to deliver carbon neutral developments by 2020, however, further thought should be given to whether the planning system is the best mechanism to facilitate any improvement in energy efficiency or whether this should remain contained within Building Regulations. Suggest Building Regulations is the appropriate mechanism to keep them relevant and up to date over time. Therefore objecting to this policy and reserve the right to be involved in further discussions regarding the policy wording.</p>	<p>Comments noted. Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. It is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p>	No change required.

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		The most cost-effective time to test and optimise energy efficiency is prior to planning when site layouts, house types, designs, fenestration and orientation are still flexible and there are no firm commitments. Once planning has been secured, making any of the above changes creates risk to both capital cost and timescales which is often deemed unacceptable by developers. Optimisation must be integrated into the design process rather than as an afterthought to achieve compliance with Building Regulations.	
2951 / Tirion Homes / Support	Supportive of the approach and note that the proposal for a new settlement (CS0224) demonstrate what is achievable to create a truly zero carbon community. This is possible due to the scale of the proposal. Propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity.	Support noted. The proposal for a new settlement at Cwm Pentref (CS0224) is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales. Further detail on this candidate site is set out in the relevant section of the Consultation Report and Candidate Sites Assessment Report.	No change required.
2952 / Candleston Homes / Support	Supportive of the approach and note that the proposal for a new settlement (CS0224) demonstrate what is achievable to create a truly zero carbon community. This is possible due to the scale of the proposal. Propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity.	Support noted. The proposal for a new settlement at Cwm Pentref (CS0224) is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales. Further detail on this candidate site is set out in the relevant section of the Consultation Report and Candidate Sites Assessment Report.	No change required.
2954 / Sero / Support	Supportive of the approach and note that the proposal for a new settlement (CS0224) demonstrate what is achievable to create a truly zero carbon community. This is possible due to the scale of the proposal. Propose that bio-gas will be generated from an offsite waste energy	Support noted. The proposal for a new settlement at Cwm Pentref (CS0224) is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales. Further detail on this candidate site is set out in the relevant section of the Consultation Report and Candidate Sites Assessment Report.	No change required.

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	plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity.		
1383 / Taylor Wimpey / Objection	Taylor Wimpey recommends the Council acknowledges the diversity of different charging speeds depending on the type of vehicle and charging location. One disadvantage of installing EVCP across an entire development is that there is a significant level of uncertainty over how much infrastructure will be required and when. Suggest as an alternative a planning policy that requires the provision of underground cabling and/or ducting is in place instead as this would allow for the proportional expansion of the charging network as demand grows. Taylor Wimpey raise concern over whether this policy requirement is supported by a relevant evidence base and appropriate viability assumptions to ensure it is justified and meets the tests of soundness.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. It is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain.</p>	No change required.
1383 / Taylor Wimpey / Objection	Whilst recognise the ambition of NZ1 question the need to step beyond the Future Housing Standards. Suggest applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of PPW. Consider the scope of NZ1 needs to be amended to align with national guidance, whilst also reflecting Future Housing Standards.	<p>Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1.</p> <p>Clearly communicating a path to apply the Energy Hierarchy for Planning set out in PPW12 is considered to be the most effective method of reducing such emissions. Welsh Government's Net Zero Wales Carbon Budget 2 (2021 to 2025) anticipated the tenure neutral delivery of Net Zero homes by the end of its term and the Climate Adaptation Strategy for Wales (2024) compels local authorities to consider the impacts of climate change in all decision making. It is considered that feasibility</p>	No change required.

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		<p>and viability have been demonstrated, as set out in the RLDP's evidence base. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.</p> <p>With regard to policy implementation, MCC has undertaken consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain.</p>	
1739 / Save Our Unique Landscape (SOUL) / Support	Welcome and support the new and updated policies dealing with the climate emergency, green infrastructure, biodiversity and landscape.	Support noted.	No change required.
1365 / Mr Adrian Lewis / Objection	HA2: creating more traffic flow will negate any effort to reach net zero.	Comments relate to the proposed site allocation at Land to the East of Caldicot/North of Portskewett (Policy HA2). The points raised are responded to in the relevant section of the Consultation Report regarding this site allocation.	No change required.
1693 / Miss Sylvia Stevens / Support	Welcomes the council's ambition to ensure all homes are net-zero carbon, however, has concerns re the cost and whether developers will bear the cost of the type of housing.	Support welcomed. It is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. As such, the proposed policy position is considered appropriate and proportionate for its context given the higher land and sales values in Monmouthshire.	No change required.
1816 / Dr. Gary C. Smith / Support	Supports use of renewable energy, net zero carbon homes, and the design of new development.	Support noted.	No change required.
2226 / Mr Gerry Moss / Objection	Supports the principle of Net Zero Carbon homes but need to consider alternative building approaches, skills and employee shortages.	Support noted. There is a burgeoning community of low energy consultants and designers both within and adjacent to the South Wales region, growing through acceptance of PHPP metrics for SHG and the Tai ar y Cyd collaboration between Welsh Government and 23 social housing providers mandating it as the base specification for delivery of the pattern book. Welsh Government are funding Net Zero training for businesses through the Flexible Skills Programme and the Construction Industry Training Board (CITB) are also facilitating funding for training, reskilling and upskilling in low energy and Net Zero construction practices.	No change required.

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2616 / Mrs Sarah Turner / Objection	Questions commitment to climate change as recent new builds have not included solar panels and still have gas boilers.	Comments noted. Policy NZ1 will apply to new homes in Monmouthshire when the RLDP is adopted. Recent new builds reflect the current policy framework and Building Regulations.	No change required.
2706 / Miss Anna Chapman / Objection	I will never support plans that force the net zero issue onto residents and it bringing changes too fast. This can only mean there will be more people in the area so more pollution. Environmentally friendly solutions like electric cars are very expensive. I don't agree with any of these plans. None of it is necessary. We are on the edge with too many issues not just in Chepstow but all over the UK. I only agree with better roads and road improvements etc this would be money well spent.	Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.	No change required.
2947 / Mr R Lewis / Objection	Proposals for HA11 conflict with Policy NZ1. Also query practical implementation of Policy NZ1 and how they will be enforced? Information is needed on how the council will ensure compliance with NZ1 and how they will monitor the energy performance	Comments relate to the proposed site allocation at Land East of Burrium Gate, Usk (Policy HA11). The points raised are responded to in the relevant section of the Consultation Report regarding this site allocation. There is not considered to be conflict between Policy HA11 and Policy NZ1. 'As-built performance survey' could be clarified as an as-built energy assessment/ model/ report of the homes reflecting the construction specification delivered on site and information such as the achieved air permeability. No ongoing monitoring is proposed. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys'.	No change required.
3353 / Dr Alison Weightman / Support	Energy efficient proposals for new housing is welcomed.	Support noted.	No change required.
3407 / Mr Ian Glen / Objection	Concerns proposals will not actually be Net Zero Carbon with the use of new materials.	Comment noted. Embodied and Operational Carbon are two different considerations. The scope of Policy NZ1 is limited to operational emissions arising from the ongoing use of a home.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3497 / Mrs Abigail Harden / Support	No comment made.	Support noted.	No change required.
3532 / Mr Nigel Haines / Objection	The net zero policy will destroy the UK economy so please stop trying to get there. The objective is laudable but will only make us poorer and will make no difference to global warming.	Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1. The policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.	No change required.
3553 / Mr Andrew Erskine / Objection	Supports inclusion of solar panels and heat pumps and suggests heat pumps serve more than one home to increase cost effectiveness. Concerned the plan doesn't include provision for charging points for homes with no off-road parking. Resident only charge points are provided in several cities as well as secure on street cycle storage.	Support noted. The Policy seeks to ensure the provision of ULEV charging infrastructure is provided to every new dwelling. This will be considered on site-by-site basis. Commentary regarding EV charging for dwellings with no off-road parking provision acknowledged. Retrofitting of ULEV charging infrastructure is outside the scope of the RLDP.	No change required.
3568 / Mrs Anne Moss / Objection	While I support the Net Zero Carbon housing led developments, we need to think more laterally to achieve this. We need to think about factory type, QA assured production techniques, as used in north and western Europe, rather than traditional UK house building approaches, skills and employee shortages.	Comments noted and acknowledged. Of note, there is a burgeoning community of low energy consultants and designers both within and adjacent to the South Wales region, growing through acceptance of PHPP metrics for SHG and the Tai ar y Cyd collaboration between Welsh Government and 23 social housing providers mandating it as the base specification for delivery of the pattern book. Welsh Government are funding Net Zero training for businesses through the Flexible Skills Programme and the Construction Industry Training Board (CITB) are also facilitating funding for training, reskilling and upskilling in low energy and net zero construction processes.	No change required.
3873 / Mr V G Danks / Support	S4 makes sense in the current circumstances if the developers actually comply with it.	Support noted.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3886 / Mrs Nerys Wilson / Comment	Must be implemented sensitively in conservation areas to balance with preservation of CAs.	Commented noted. Relevant policies of the RLDP regarding the historic environment will apply to proposals for net zero carbon homes in Conservation Areas.	No change required.
3895 / Ms Pamela Robinson / Support	I applaud the stipulation that all homes must be carbon neutral. However if Chepstow continues to be a commuter town it is essential that public transport is transformed. This needs equally bold policies.	Support noted. Comments raised in relation to Chepstow and public transport are set out in the relevant section of the Consultation Report.	No change required.
3970 / Mr Steven Harris / Support	Requirement for a full operational energy strategy is very good. Do not support the RICs aligned format as this is more about whole life carbon and embodied energy, which is harder to decipher. A full SAP/HEM aligned assessment would be more normal and easier to align with Building Regulations. This is how it is currently assessed in Ealing and Greenwich. 25kWhrs/M2/yr is a good target but will need to be calculated using SAP/HEM. Onsite renewables requires more definition - suggestions provided. Additional detailed comments noted in the representation.	<p>As the conclusions of Etude Making SAP and RdSAP 11 fit for Net Zero (2021) the Standard Assessment Procedure (SAP) is not considered an accurate tool for calculating the operational performance of homes. RICS Whole life carbon assessment for the built environment v2 (2023) explicitly excludes the use of SAP calculations prepared for Approved Document L (Wales) 2022 for operational energy assessments. While a SAP conversion tool has been developed for Bath & North East Somerset and Cornwall Councils to assist implementation of their own net zero policies, it has only been verified for their specific climate regions and adjusting this for Monmouthshire would require additional capital expense by MCC.</p> <p>As HEM is still in development and yet to be released the reliability of output from its final, adopted form cannot be established.</p> <p>Alignment with RICS WLCA methodology ensures the policy remains relevant and reflective of emerging softwares and calculation methodologies deemed suitable for calculating operational energy consumption. Interaction with Policy S7 Affordable Housing should also be considered as any development implementing Tai ar y Cyd will be modelled using PHPP, one of the accepted tools for operational energy assessment under current RICS WLCA methodology.</p> <p>It is not considered necessary to provide further definition of onsite renewables by referring specifically to electricity. It is considered that the policy is sufficiently clear in this respect.</p>	No change required.

Policy CC1 – Sustainable Drainage Systems

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1024 / Dŵr Cymru Welsh Water (DCWW) / Support	Welcome that the policy requires development to incorporate water efficiency measures and to minimise adverse impacts on water resources and quality, and particularly the emphasis on the use of sustainable urban drainage system (SuDs). The tackling of surface water at source is a vital component of sustainable development and managing surface water at source will mitigate against overloaded sewers which can ultimately lead to flooding.	Support welcomed.	No change required.
1412 / Natural Resource Wales (NRW) / Comment	Policy CC1 - Sustainable Drainage Systems – paragraph 9.3.1 states 'In accordance with national guidance, S4 seeks to steer highly vulnerable development away from flood risk areas.' Suggest a simple deletion of 'highly vulnerable' as national policy (TAN15) uses a precautionary framework which seeks to avoid all new development away from flood risk areas in the first instance. Both the current wording and our suggested wording for policy S4 doesn't distinguish between vulnerabilities. (point 62)	Comments noted. For the reasons noted in the representation, reference to 'highly vulnerable' will be deleted from paragraph 9.3.1.	Remove reference to 'highly vulnerable' from paragraph 9.3.1.
1803 / Councillor Dr Louise Brown / Objection	The policy should add that all new building developments will be required to have an inspection prior to residential occupation to ensure that adequate drainage is in place in order to prevent potential future flooding of residential developments which	All development should comply with national and local policy regarding flood risk and sustainable drainage systems. The policy and regulatory frameworks in place seek to ensure this is considered as an integral part of a development from the outset. However, the suggested wording regarding an inspection prior to occupation is not considered appropriate for inclusion within the policy. The Planning Section does not have the resources to undertake a site inspection on all	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	is more likely in view of heavier rainfall due to climate change.	new building developments. Site inspections are however, undertaken by Building Control under the Building Regulations.	
3118 / Councillor Meirion Howells / Support	I support the use of sustainable drainage systems which must be an integral part of a development to ensure consideration is given to surface water drainage discharges, water quality, amenity and biodiversity enhancement.	Support welcomed.	No change required.
1138 / Raglan Community Council / Objection	It's noted from current planning applications that DCWW has major issues managing ground water and foul water to their treatment plant and water courses in Raglan. There is no evidence that DCWW have shown commitment to Policy CC1 and the investment in substantial infrastructure improvements. Currently ground water and surface water is a major issue in Raglan.	Dŵr Cymru Welsh Water has responded positively to Policy CC1 and has not identified any issues with the water supply network or foul flows being accommodated at the Raglan WwTW in relation to the proposed site allocations in Raglan. 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 the associated supporting text.	No change required.
1255 / Home Builders Federation (HBF) / Objection	Policy is unnecessary as requirement to use SuDS is covered by separate legislation and is not the role of the planning system to go further on drainage legislation.	It is recognised that sustainable drainage (SuDs) systems are a requirement of separate legislation, however, Policy CC1 is considered necessary to reinforce the Council's position that regardless of size, there will be an expectation that sustainable drainage methods are incorporated into a scheme. The policy will therefore be of relevance to schemes lower than the threshold set out in the relevant legislation. The policy also highlights that the distribution of SuDs features across the site should be prioritised.	No change required.
3562 / Gateway to Wales Action Group / Comment	Note Policies CC1, CC2 and CC3 have noble objectives but as to whether they are achievable is outside the scope of the report.	Support for Policies CC1, CC2 and CC3 is welcomed. The RLDP contains a Monitoring and Review chapter which will be used to assess whether the Plan's strategy, policies and proposals are being delivered, with the results published in an Annual Monitoring Report.	No change required.

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3562 / Gateway to Wales Action Group / Comment	Refer to SuDS noting these are not effective on phosphates and only remove 15 to 24% of phosphates from runoff water. Suggest in Monmouth the rest will wash off into the River Wye.	Comments noted. Policy CC1 seeks to ensure that the use of sustainable drainage systems (SuDs) is an integral part of a development from the outset. These are multi-functional solutions that extend further than stripping phosphates and seek to manage rainfall in a similar way to natural processes to control the flow and volume of surface water. The Council has worked extensively with Dŵr Cymru Welsh Water (DCWW) and Natural Resources Wales (NRW) on the management of nutrient phosphates in Monmouthshire's rivers. NRW has issued detailed planning guidance and DCWW have given a firm commitment to secure improvements to their Wastewater Treatment Works (WwTW) to address the phosphate issue. With specific regard to Monmouth, DCWW has confirmed upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025.	No change required.
1301 / Melin Homes / Support	Supportive of the policy. Noted that proposed new settlement (CS0224) provides a nature-based solution which will secure a net biodiversity gain. Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, lining into 125ha of new habitat and green space.	Support welcomed. With regards to candidate site CS0244 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	No change required.
1683 / Llanarth Estates / Support	Supportive of the policy. Noted that proposed new settlement (CS0224) provides a nature-based solution which will secure a net biodiversity gain. Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, lining into 125ha of new habitat and green space.	Support welcomed. With regards to candidate site CS0244 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	No change required.
1736 / Bellway Homes / Objection	Policy CC1 is not specifically required as it is a repetition of requirements set out within the Flood and Water Management Act 2010. The current wording is inaccurate with the assumption that all development requires Sustainable Drainage Systems.	It is recognised that sustainable drainage (SuDs) systems are a requirement of separate legislation, however, Policy CC1 is considered necessary to reinforce the Council's position that regardless of size, there will be an expectation that sustainable drainage methods are incorporated into a scheme. The policy will therefore be of relevance to schemes lower than the threshold set out in the relevant legislation and as clarified in paragraph 9.3.8. The policy also highlights	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	Only at supporting paragraph 9.3.7 is it clarified that SuDS drainage proposals are required for all new development over 100m2 of construction area. The policy is seeking to extend beyond the requirement of the Flood and Water Management Act 2010 at supporting paragraph 9.3.8. Suggest the policy is either removed or reworded to reflect the legislative requirements.	that the distribution of SuDS features across the site should be prioritised. The policy is therefore considered to be necessary.	
2951 / Tirion Homes / Support	Supportive of the policy. Noted that proposed new settlement (CS0224) provides a nature-based solution which will secure a net biodiversity gain. Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, lining into 125ha of new habitat and green space.	Support welcomed. With regards to candidate site CS0244 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	No change required.
2952 / Candleston Homes / Support	Supportive of the policy. Noted that proposed new settlement (CS0224) provides a nature-based solution which will secure a net biodiversity gain. Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, lining into 125ha of new habitat and green space.	Support welcomed. With regards to candidate site CS0244 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	No change required.
2954 / Sero / Support	Supportive of the policy. Noted that proposed new settlement (CS0224) provides a nature-based solution which will secure a net biodiversity gain. Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced,	Support welcomed. With regards to candidate site CS0244 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	lining into 125ha of new habitat and green space.		
1383 / Taylor Wimpey / Objection	Consider Policy CC1 is not specifically required as it repeats requirements set out within the Flood and Water Management Act 2010. Suggest the policy as worded is inaccurate with the assumption that all development requires Sustainable Drainage Systems. Note this conflicts with supporting paragraph 9.3.7 where it is clarified that SuDs drainage proposals are required for all new development over 100m2 of construction area. Recognise the policy is seeking to extend beyond the requirement of the Flood and Water Management Act 2010 in paragraph 9.3.8. Request the policy is either removed or reworded to reflect legislative requirements.	It is recognised that sustainable drainage (SuDs) systems are a requirement of separate legislation, however, Policy CC1 is considered necessary to reinforce the Council's position that regardless of size, there will be an expectation that sustainable drainage methods are incorporated into a scheme. The policy will therefore be of relevance to schemes lower than the threshold set out in the relevant legislation and as clarified in paragraph 9.3.8. The policy also highlights that the distribution of SuDs features across the site should be prioritised. The policy is therefore considered to be necessary.	No change required.
3353 / Dr Alison Weightman / Comment	The requirement on the developer to 'reduce' surface water run-off could be negligible unless the reduction is modelled and quantified, based on the loss of green field water absorption as the development land is concreted over.	Comments noted. 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. The surface water regulatory framework is administered by the sustainable drainage approving body (SAB) who require modelling data to undertake the necessary assessments.	No change required.
3358 / Mr Craig Wooler / Objection	Localised flooding in development areas. Building new developments, no matter what plans are in place, will not help but only make things worse as the areas are not equipped to cope.	The site selection process has had full regard to the policy requirements of Welsh Government's flood risk policy set out in Planning Policy Wales and Technical Advice Note 15. In addition, all allocations will be required to be approved by the Sustainable Drainage Approving Body (SAB).	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3606 / Mr David Williams / Objection	Places like Monmouth, where the axle/spokes of the typical market town road structure are located in a Flood Zone 3 rivers/sea area, it is important to recognise that additional development on adjacent higher ground significantly contributes to an increase in flooding via extra surface water run-off flowing into the Flood Zone 3 rivers/sea area.	Comments noted. 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. The surface water regulatory framework is administered by the sustainable drainage approving body (SAB) who require modelling data to undertake the necessary assessments to ensure surface water drainage impacts on and off site are comprehensively considered as part of new developments proposals.	No change required.
3763 / Natalie Sandercock / Objection	<p>Policy CC1 should be amended to explicitly state that where MCC as Planning Authority cannot be satisfied that sustainable drainage systems (Suds) will eradicate flood risk to nearby properties caused by run-off from development and/or the diversion of watercourses, then permission for such development should be refused.</p> <p>Policy CC1 at para. 9.3.6 should also be amended and clarified to explicitly set out the circumstances where MCC has responsibility for adopting and maintaining approved drainage systems, as residents of MCC are unclear about this. This will also help inform planning applications in terms of the distinction between the properties caused by inadequate drainage systems.</p>	The suggested policy wording is not considered necessary as proposals that fail to satisfy the policy requirements will be contrary to the development plan. In addition, 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. The surface water regulatory framework is administered by the sustainable drainage approving body (SAB), which is Monmouthshire County Council in Monmouthshire's case. Further information relating to who is responsible for adopting and maintaining approved drainage systems is set out on the Council's SAB webpages, as different arrangements apply in different circumstances. It is therefore not considered necessary to provide details in paragraph 9.3.6.	No change required.
3781 / Mrs Karen Schneider / Support	There should be efforts to prevent excess rain run-off from impermeable surfaces.	<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> <p>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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		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.	
3873 / Mr V G Danks / Objection	Given this area is a natural floodplain and has historically been recorded to hold large volumes of surface water during ever increasing rain events and this area performs part of a wider culvert and rain infrastructure I find it difficult to believe that this will be possible to implement with density of housing either effectively or efficiently. I have no doubt the focus will be on the new development but not down flow impacts which have been woefully managed or maintained by MCC and the land owners of many years.	It is not clear which site(s) the comments related to. Further detailed comments on the flood risk management and mitigation of site allocations are provided in the responses to policies HA1 – HA18.	No change required.
3886 / Mrs Nerys Wilson / Comment	Policies NZ1, CC1, CC2, and CC3: These policies should focus on reducing the carbon footprint of new developments, encouraging the use of low-carbon technologies, and improving the sustainability of the village's infrastructure. However, it is essential that these policies are applied in a way that respects Shirenewton's rural setting and does not lead to overdevelopment or significant environmental impact.	The policies noted address the concerns raised including setting out net zero carbon requirements for new homes and renewable energy generation requirements. The RLDP also sets out a range of policies that appropriately consider the potential impact on the rural setting of Monmouthshire and environmental considerations including PM1 – Creating Well-Designed Places and Policy HE1 – Conservation Areas.	No change required.

Policy CC2 – Renewable Energy Allocation

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2498 / Councillor Penny Jones / Objection	Solar panels built on important dairy agricultural land is concerning and lead to unemployment of the family members of the farm. This is at a time when farmers are being encouraged to provide food for the country.	<p>Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives. The ongoing use of the land for agricultural purposes alongside the solar panels forms part of the intentions for use of the land.</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.</p>	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 whilst also recognising the distance between the industrial units and urban form. 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> <p>It is not clear from the comments which document is being referred to in relation to the 'Raglan combined 2023 document'.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1739 / Save Our Unique Landscape (SOUL) / Support	Welcome and support the new and updated policies dealing with the climate emergency, green infrastructure, biodiversity and landscape.	Support welcomed.	No change required.
1982 / Mrs Compton / Objection	Opposition to the proposal for the land in Raglan to be used for ground mounted solar development. No infrastructure in place to deploy to the grid. Agricultural land given to the Council, in trust, to be retained for agricultural/livestock use. The land should remain in agricultural use and not change its designation to employment use. The adjoining area supports nesting sites for bats and amphibians. This proposal brings no local benefit to the community or businesses.	<p>Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives.</p> <p>It is acknowledged that grid improvements may be needed to facilitate grid exports from the proposed allocation and dialogue is ongoing with National Grid in this regard. With regards to the loss of agricultural land, the intention is to continue to graze the land around the panels, which is common practice with ground mounted solar developments. 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.</p> <p>The RLDP includes a range of policies that consider the potential impact on ecological and biodiversity impact. Policy CC3 itself requires proposals to have no unacceptable adverse impacts on biodiversity and the wider RLDP policy framework includes policy NR1 – Nature Recovery and Geodiversity which also seek to address the concerns raised.</p> <p>With regards to local community benefits, Welsh Government has an expectation for all new renewable energy projects in Wales to include at least an element of local ownership, to retain wealth and provide real benefit to communities.</p>	No change required.
3497 / Mrs Abigail Harden / Objection	"Disgusted" at the policy due to solar farm siting on family-owned land. Need for local renewable energy is recognised however suggests other, less profitable, farming	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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	land proposed to MCC in the past shouldn't have been ignored. Hopes every future Raglan home is built with solar arrays, and publicly owned buildings such as the school are retrofitted with solar and low carbon heating.	<p>decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives. For clarification the land is owned by Monmouthshire County Council.</p> <p>MCC received four solar renewable and low carbon energy candidate sites, as part of the Second Call for Candidate Sites. These were assessed as part of the wider candidate site assessment process, which concluded that the land put forward at Raglan Enterprise Park performed best compared to the other submissions and provides an opportunity to contribute to renewable energy generation targets.</p> <p>Policy NZ1 – Monmouthshire Net Zero Carbon Homes of the RLDP requires new build residential development to meet net zero standards, including on-site renewable energy generation. The retrofitting of Council owned buildings is an action of the Climate and Nature Emergency Strategy noted above.</p>	
3563 / L Morgan and T Perkins / Objection	Object to the solar development. The land is regenerately farmed grassland. A hydrologist has said the water will flood 5-10 times faster with the panels rather than grass. There is a problem with the sewage works top pump house. The road flooding. The development will cause more problems with sewage work and road closures. Provided a map with flood locations.	<p>Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives.</p> <p>Policy CC1 of the RLDP 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> <p>In addition, 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. For information, the site is not within a flood risk area on Welsh Government's Flood Maps for Planning, however any proposals that come forward via the planning application process will be required to satisfy</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>national flood risk policy set out in Technical Advice Note 15: Development, Flooding and Coastal Erosion.</p> <p>Dŵr Cymru Welsh Water (DCWW) has been involved in the RLDP process from the outset and has provided comments on the Deposit Plan. DCWW has not identified any issues with proposed solar/employment allocation at Raglan Enterprise Park.</p>	
3564 / Leonard Morgan / Objection	Objects to solar farm due to flooding.	<p>The site is not within a flood risk area on Welsh Government's Flood Maps for Planning, however any proposals that come forward via the planning application process will be required to satisfy national flood risk policy set out in Technical Advice Note 15: Development, Flooding and Coastal Erosion.</p> <p>In addition, Policy CC1 of the RLDP 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. Surface water drainage requirements are also 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.</p>	No change required.
3804 / Mr Luke Thompson / Objection	The solar site is ill thought out. By proposing this site, 4 local family's incomes are at risk as well as impacting other rural businesses. Object to its siting. CC1 states that it wishes to reduce surface water run-off, but solar panels are known to increase the risk of water run-off.	<p>Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives. The ongoing use of the land for agricultural purposes alongside the solar panels forms part of the intentions for use of the land.</p> <p>Policy CC1 of the RLDP 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. In addition, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose,</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>For information, the site is not within a flood risk area on Welsh Government's Flood Maps for Planning, however any proposals that come forward via the planning application process will be required to satisfy national flood risk policy set out in Technical Advice Note 15: Development, Flooding and Coastal Erosion.</p>	
3873 / Mr V G Danks / Comment	Again, a statement without detail so how can this be commented on?	It is not clear what policy is being referred to and therefore, the Council is unable to respond to this representation.	No change required.
3886 / Mrs Nerys Wilson / Comment	The policy should focus on enhancing biodiversity, protecting green spaces and improving infrastructure sustainably. Essential to ensure these initiatives integrate with the traditional aesthetics of a rural village.	<p>Policy CC2 – Renewable Energy Allocation, identifies land as having potential for a ground mounted solar development on land adjacent to Raglan Enterprise Park. Any detailed scheme that comes forward on the site will be subject to assessment against the criteria set out in Policy CC3 - Renewable Energy Generation, national planning policy and the wider RLDP policy framework.</p> <p>The RLDP includes a range of policies that consider the potential impact on the rural setting of Monmouthshire and environmental considerations noted. Policy CC3 itself requires proposals to have no unacceptable adverse impacts on landscape, townscape, historic features, and biodiversity. The wider RLDP policy framework includes policies such as LC1 – Landscape Character and NR1 – Nature Recovery and Geodiversity which also seek to address the concerns raised.</p>	No change required.
3924 / Mr Richard Dobbin / Objection	Should avoid solar on viable agricultural land and consider solar installation to large roofs of industrial buildings and wind power near the Bristol Channel where the wind is more reliable, and power distribution would be less challenging.	<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.</p> <p>A Renewable and Low Carbon Energy Assessment was undertaken as part of the RLDP evidence base. This concluded that there is limited resource potential for wind power within the County, however, Policy CC3 – Renewable Energy</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Generation, provides the policy framework to assess such proposals on a case-by-case basis.</p> <p>The Council is supportive of roof mounted solar panels, subject to detailed design considerations and has also set out policy requirements for on-site renewable energy generation as part of any new residential proposals via Policy NZ1 – Monmouthshire Net Zero Carbon Homes.</p>	
3930 / Mr Robert Hughes / Objection	This land is good agricultural land that should be used for food security. This type of energy capture is useless when the sun does not shine and is a real problem going forward.	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.	No change required.

Policy CC3 – Renewable Energy Generation

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1356 / Welsh Government / Support	The plan has not allocated local search areas for ground mounted solar PV development. The WG has engaged with the LPA on this matter, highlighting the BMV policy, DCPO letter (01/03/22) and the large proportion of high-quality agricultural land in Monmouthshire. The proposal for considering renewable energy development on a case-by-case basis against national planning policy and the LDP policy is welcome.	Support welcomed.	No change required.
1376 / Abergavenny Transition Town / Objection	Conclusions from researched investigations and its policy implications are profoundly disturbing and should be revisited. Policy CC3 makes it almost impossible to meet all those demands. Major argument appears to be protecting the distinct character of Monmouthshire's landscape and BMV agricultural land. This land is not being used in a very versatile way, not an efficient use of productive farmland, and there is no consideration that there are formats of RE that can allow agricultural usages of the land to continue.	<p>The approach taken to Best and Most Versatile (BMV) agricultural land is consistent with Planning Policy Wales and the letter issued by the Minister for Climate Change on the 1st March 2022. This clarified that considerable weight should be given to protecting BMV agricultural land when considering solar proposals. Policy CC3 does however, provide the opportunity to undertake a sequential approach to site selection to demonstrate that reasonable alternatives have been considered, which would allow for the consideration of the use of BMV land.</p> <p>The consideration of landscape impact is also consistent with Planning Policy Wales and a standard consideration to have regard to in any development.</p> <p>It is considered that the approach of assessing renewable energy proposals on a case-by-case basis against national planning policy and the RLDP policy framework is appropriate.</p>	No change required.
1739 / Save Our Unique Landscape (SOUL) / Support	Welcome and support the new and updated policies dealing with the climate emergency, green infrastructure, biodiversity and landscape.	Support welcomed.	No change required.
1779 / Mrs Sandra Lloyd / Objection	Update to reference national policy as to where development is required to be precluded e.g. PPW12 precludes any	In accordance with Welsh Government guidance set out in the Development Plans Manual, an LDP should not repeat national policy. It is therefore not necessary to add the suggested wording to the policy.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	development on SSSI unless it is for management of the site.		
2226 / Mr Gerry Moss / Objection	<p>The new housing proposals at Caldicot-Portskewett where flooding is known to happen tells me that the Climate Emergency is not adequately appreciated.</p> <p>I support renewable energy in principle but it must be undertaken with safeguards that suitably reflect the public interest regarding a sustainable, society focused community.</p>	<p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>Specific issues relating to the proposals in Caldicot-Portskewett are set out in the responses to HA2 – Land to the East of Caldicot/North of Portskewett.</p> <p>In principle support for renewable energy proposals is welcomed. Policy CC3 seeks to ensure such proposals are balanced against a range of issues including wider environmental, economic, social and community benefits as set out in criterion h).</p>	No change required.
3279 / Dr Sian E Rees / Support	The encouragement of solar power generation from roofs of new build houses is very welcome (p.68)	Support welcomed.	No change required.
3492 / Claire Richards / Objection	A reference to national policies stating where development is precluded is required, e.g. PPW precludes any development on SSSI unless it is for management of the site.	In accordance with Welsh Government guidance set out in the Development Plans Manual, an LDP should not repeat national policy. It is therefore not necessary to add the suggested wording to the policy.	No change required.
3873 / Mr V G Danks / Objection	There are two key statements in this that are both factually incorrect and deliberately misleading: e) This is part of the Gwent Levels and its associated ecosystem so who decided what was acceptable as there is no indication within this report of the acceptable impact on biodiversity and who made that decision?	Policy CC3 – Renewable Energy Generation, does not make a renewable energy allocation but provides the criteria to assess proposals when they come forward. It is not clear from the comments, what proposal is being assessed against the criteria, the Council is therefore not able to respond to this representation.	No change required.

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	f) TfW report as indicated that this is factually incorrect and a deliberate ploy to force more on less whilst not impacting Monmouth or Rogiet area where most of the decision makers reside. i) This is incorrect this will just mean SE Monmouthshire is an even larger suburb of the Bristol commuter belt.		
3886 / Mrs Nerys Wilson / Comment	The policy should focus on enhancing biodiversity, protecting green spaces and improving infrastructure sustainably. Essential to ensure these initiatives integrate with the traditional aesthetics of a rural village.	The RLDP includes a range of policies that consider the potential impact on the rural setting of Monmouthshire and the environmental considerations noted. Policy CC3 itself requires proposals to have no unacceptable adverse impacts on landscape, townscape, historic features, and biodiversity. The wider RLDP policy framework includes policies such as LC1 – Landscape Character and NR1 – Nature Recovery and Geodiversity which also seek to address the concerns raised.	No change required.