

APPENDIX 3



Monmouthshire Replacement Local Development Plan 2018-2033

Report Of Consultation: Appendix 12
Deposit RLDP Representation Responses

Volume 21 – Background Papers

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Candidate Sites Assessment Report

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3731 / Mr James Spreckley MRICS / Objection	The Candidate Sites Assessment Report 2024 is fundamentally flawed, and given that the preferred Leasbrook site is relied upon in the Deposit Plan to deliver the required housing growth in Monmouth, the process does not pass the relevant tests with regard to full public consultation of an emerging LDP. In contrast to the allocation sites in Chepstow, no qualitative analysis of the three competing housing allocation sites in Monmouth has been published or consulted upon.	<p>Reflecting the provisions of the Delivery Agreement, Council endorsed the post-consultation updates to the Preferred Strategy on 26th October 2023 this resulted in the inclusion of the Leasbrook housing allocation in Monmouth. These updates were summarised in paragraph 3.9 of the Council Report as the basis for the ongoing preparation of the Deposit Plan. The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 do not require local authorities to endorse the Preferred Strategy post-consultation. However, this non-statutory part of the RLDP process was considered important to provide Elected Members with an update on the key issues raised through the Preferred Strategy consultation and to seek endorsement of the subsequent proposed post-consultation changes to be taken forward to the Deposit RLDP. In terms of housing growth in Monmouth, there was a further opportunity for stakeholders and communities to submit comments at the Deposit consultation stage of the process. Consideration of the Plan's soundness is set out in the Council's Self-Assessment of the Deposit Plan against the Tests of Soundness which demonstrates that the Deposit Plan and the processes followed to reach this stage are 'sound' and should be referred to accordingly.</p> <p>The Candidate Site Assessment Report has been informed by and reflects the candidate sites assessment process (set out in the Candidate Sites Methodology Background Paper).</p>	No change required.

Infrastructure Delivery Plan Background Paper

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1685 / Stephen Arnell / Objection	Refer to CS0240 raising concern over the reason for the site being rejected. Suggests the concern over highway impact is false. Also suggest the site being wholly Grade 2 BMV land should not be a reason as this should be based on land in square metres.	<p>Comments noted. As noted, the Candidate Site Assessment Report does state that the site is not progressing as concerns have been raised in relation to highway impact. Colleagues in the highway team have provided comments to this effect. However, it is recognised that a transport assessment has not been undertaken for the site and that this could identify potential mitigation and improvements. As a result, this reference will be omitted from the Candidate Site Assessment Report in relation to CS0240.</p> <p>The Candidate Site Assessment Report has been informed by and reflects the candidate sites assessment process (set out in the Candidate Sites Methodology Background Paper). Decisions on which sites are proposed to be allocated for development are multifaceted and, in many circumstances, there will not be one sole reason for a site being chosen over another. The site selection process is a balanced one and all of the planning rationale for each site needs to be carefully weighed up. The issue identified with regard to highway impact for CS0240, therefore, does not affect the outcome of the site selection process in Shirenewton. In accordance with the DPM, the Candidate Site Assessment Report will be updated and published as part of the RLDP submission documents to reflect the updated position for site CS0240.</p> <p>In terms of BMV agricultural land, the candidate sites assessments were informed by the predictive agricultural land classification maps, which identifies the CS0240 site as being Grade 2 BMV land.</p>	Amend the Candidate Site Assessment Report to note: 'The whole site is Grade 2 BMV agricultural land. Site is not allocated as there is sufficient and more suitable land available for residential development within the Main Rural Settlement of Shirenewton to accommodate its housing need.'
3543 / Mr Paul Dalton / Objection	The infrastructure delivery plan needs to be issued at the same time as the replacement plan so both can be considered at the same time.	<p>The Infrastructure Delivery Plan (IDP) is included as Appendix 8 of the RLDP and was consulted upon as part of the Deposit Plan. The Infrastructure Delivery Plan Background Paper provides additional detail in the introductory chapters on existing infrastructure provision and capacity across the County covering a range of topic areas.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting the inclusion of the Infrastructure Delivery Plan Background Paper is in line with paragraphs 5.125 – 5.128 of the Development Plans Manual Wales (2020).</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		The Infrastructure Delivery Background Paper was available on the Council's website for the entirety of the RLDP Deposit consultation and remains available to view.	

Sustainable Settlements Appraisal (Updated December 2022)

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1138 / Raglan Community Council / Objection	Raglan CC object to the SSA. The appraisal failed to evaluate Tier 4 settlements despite the changes to Policy H3 which will direct significantly increased development pressures towards Minor Villages.	The Sustainability Settlement Appraisal (SSA) covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council's website was corrupt, so these settlements did not show properly. This has now been rectified. The SSA, including the Tier 4 settlements were considered in formulating the settlement hierarchy set out in Policy S2.	No change required.
3836 / Steve Hoselitz / Objection	The appraisal failed to evaluate Tier 4 settlements despite the changes to Policy H3 which will direct significantly increased development pressures towards Minor Villages; see comments made in relation to policies S2, H3 and H9 and in support of the most recent 2010 Study: Landscape Sensitivity and Capacity Study: Main Villages and H4 Settlements June 2010 [H4 being 2006 UDP Policy].	The Sustainability Settlement Appraisal (SSA) covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council's website was corrupt, so these settlements did not show properly. This has now been rectified. The SSA, including the Tier 4 settlements were considered in formulating the settlement hierarchy set out in Policy S2.	No change required.
3983 / Mr Tim James / Objection	The appraisal failed to evaluate Tier 4 settlements despite the changes to Policy H3 which will direct significant increased development pressures towards Minor Villages.	The Sustainability Settlement Appraisal (SSA) covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council's website was corrupt, so these settlements did not show properly. This has now been rectified. The SSA, including the Tier 4 settlements were considered in formulating the settlement hierarchy set out in Policy S2.	No change required.

Settlement Boundary Review (October 2024)

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1281 / Barratt David Wilson Homes / Objection	Settlement boundary should be redrawn to include Land at Bayfield Chepstow in order to provide the additional housing required to meet Monmouthshire's key issues and re-balance the distribution of growth with a higher proportion of growth within Chepstow (Q4. points 1.1 & 1.2).	<p>The settlement boundaries defined on the Proposals Map to inform the implementation of the housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy.</p> <p>The settlement boundary defined on the Proposals Map for Chepstow reflects the Council's decision to allocate Land at Moun-ton Road, Chepstow under Policy HA3. The merits of allocating candidate site CS0098 – Land at Bayfield Chepstow, Chepstow in the Deposit Plan were considered by Council in October 2023, where a decision was agreed to amend the strategic site allocation in Chepstow from Land at Bayfield to Land at Moun-ton Road on that basis that a mixed-use development has associated job creation and tourism benefits. Further detailed comments on this issue are set out in relation to CS0098 in the Alternative Sites section of the Consultation Report.</p>	No change required.
1281 / Barratt David Wilson Homes / Objection	Settlement boundary should be redrawn to include Land at Bayfield Chepstow in order to provide the additional housing required to meet Monmouthshire's key issues and re-balance the distribution of growth with a higher proportion of growth within Chepstow (Q9. points 1.1 & 1.2).	The settlement boundaries defined on the Proposals Map to inform the implementation of the housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary	No change required.

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		<p>settlements of Abergavenny, Chepstow, Caldicot and Monmouth. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy.</p> <p>The settlement boundary defined on the Proposals Map for Chepstow reflects the Council's decision to allocate Land at Moun-ton Road, Chepstow under Policy HA3. The merits of allocating candidate site CS0098 – Land at Bayfield Chepstow, Chepstow in the Deposit Plan were considered by Council in October 2023, where a decision was agreed to amend the strategic site allocation in Chepstow from Land at Bayfield to Land at Moun-ton Road on that basis that a mixed-use development has associated job creation and tourism benefits. Further detailed comments on this issue are set out in relation to CS0098 in the Alternative Sites section of the Consultation Report.</p>	
1467 / Hallam Land / Support	Support the amendments being sought in respect of the existing settlement boundary of Monmouth, in particular reference 20 that allows facilitation of delivery of HA6 Land at Rockfield Road. Consider the change to facilitate the allocation and extant consent represents a logical extension to the defined urban area of Monmouth.	Support welcomed.	No change required.
1480 / Edenstone Homes / Support	Support the amendments being sought in respect of the existing settlement boundary associated with Abergavenny. Most notably that includes reference 147 which intends to amend the boundary in the north-western corner of the town to	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	facilitate the delivery of HA5 - Land at Penlanlas Farm.		
1596 / MHA / Support	MHA supports the amendments being sought in respect of the existing settlement boundary. Most notably that includes reference 111 which intends to amend the boundary in the southern corner of the settlement to facilitate the delivery of Residential Allocation HA13 - Land adjacent to Piercefield Public House.	Support welcomed.	No change required.
1694 / The Stantonbury Building and Development Company / Objection	The settlement boundary of Abergavenny should be amended so that CS0108 Land north of Hillgrove Avenue is included within the settlement boundary.	The settlement boundary defined around Abergavenny reflects the spatial strategy and housing allocations made in the Deposit Plan. The Council's conclusions in relation to CS0108 – Land North of Hillgrove Avenue, Abergavenny are set out in the Candidate Site Assessment Report 2024, which concludes that the site is not progressing due to highway and landscape impact concerns and overall, there are considered to be more suitable sites available in Abergavenny. It is, therefore, not considered appropriate to amend the settlement boundary as suggested.	No change required.
1736 / Bellway Homes / Objection	Raise concern given the guiding principles used to provide a consistent approach to the review of the settlement boundaries. Object to boundary changes proposed at reference 151 (HA1 Land east of Abergavenny) . This boundary change is clearly detached from the settlements and is inconsistent with the methodology.	The settlement boundaries defined on the Proposals Map to inform the implementation of the housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Further details on the proposed site allocation at Land to the East of Abergavenny are set out in the relevant section of the Consultation Report.	
1383 / Taylor Wimpey / Objection	Object to boundary changes proposed at 151 - Land to the east of Abergavenny adjusted to include HA1 and 18 - Leasbrook adjusted to include HA4. Suggest both of these changes despite being done so for allocations are clearly detached from the settlements.	<p>The settlement boundaries defined on the Proposals Map to inform the implementation of the housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy.</p> <p>Further details on the proposed site allocations at Land to the East of Abergavenny and Land at Leasbrook are set out in the relevant sections of the Consultation Report.</p>	No change required.
2398 / Anthony Davies / Objection	Object to the Devauden Settlement Boundary Review determination (Ref 119). The requested change provides a natural rounding off opportunity and will visually improve the outlook of the properties in Tudor Gardens. Significant improvements to the landscaping and screening on the site are proposed as well as adjustments to the habitat that would benefit the ecological balance. The boundary change could support 3 self build homes.	The proposed site was reviewed as part of the Settlement Boundary Review which concluded that the settlement has a logical edge in this location. Moreover, the proposed site at 2.1ha is considered too large a scale for this rural settlement.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3172 / Richard Liddell / Objection	The Settlement Boundary Review October 2024 makes no mention of a mixed use at HA3 Mounton Road - it only refers to housing.	Omission noted. It is agreed that the review should refer to the site at Mounton Road being a proposed mixed-use allocation.	Amend Settlement Boundary review to reflect that the allocation is for a residential led mixed use development.

Housing Background Paper

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2498 / Councillor Penny Jones / Comment	Numbers identified in the RLDP is not the number proposed in Raglan with other sites taken into isolation - the numbers cannot be seen in isolation.	The housing provision figure set out in the Replacement Local Development Plan is made up of a number of housing supply components. These include completions during the plan period so far (2018-2025), existing commitments and windfall and infill allowances. These are deducted from what is required and the remaining figure is met through housing allocations. With regards to Raglan, the allocation made in the Adopted Local Development Plan on Land at Chepstow Road, Raglan is included in the figures as an existing commitment and the land north of Monmouth Road, which is the subject of a planning application, has been included as a potential windfall site in the Housing Potential Study.	No change required.
1138 / Raglan Community Council / Objection	The section entitled Housing Potential Study, and its Appendix 1 should not have included the Area of Amenity Importance north of Monmouth Road, Raglan.	<p>The Housing Potential Study (HPS) sets out where windfall allowances (sites of 10 or more dwellings) could potentially come from within the County and has been used as a basis for the windfall allowance in the housing supply components. Given the submission of a planning application on the privately owned site, the land has been included within the HPS to inform potential windfall sites. The planning application has been considered by Planning Committee, who resolved to approve the application subject to a S106 Agreement. The site is currently awaiting the signing of the S106 Agreement. The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes across the County. In this respect, a conservative approach to windfall provision has been taken.</p> <p>A review of the Areas of Amenity Importance (AAI) has been undertaken as part of the RLDP evidence base. Areas that are privately owned and not accessible to the public have been excluded from the AAI designation. Consistent with this approach, land formerly designated as AAI in the Adopted Local Development Plan on land to the north of Monmouth Road is no longer allocated as AAI in the RLDP. Further details of the review can be found in the Areas of Amenity Importance Review.</p>	No change required.
1984 / Raglan Village Action Group / Objection	Housing Potential Study and its Appendix 1 should not have included the AAI north of Monmouth Road, Raglan.	The Housing Potential Study (HPS) sets out where windfall allowances (sites of 10 or more dwellings) could potentially come from within the County and has been used as a basis for the windfall allowance in the housing supply components. Given the submission of a planning application on the privately owned site, the land has	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>been included within the HPS to inform potential windfall sites. The planning application has been considered by Planning Committee, who resolved to approve the application subject to a S106 Agreement. The site is currently awaiting the signing of the S106 Agreement. The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes across the County. In this respect, a conservative approach to windfall provision has been taken.</p> <p>A review of the Areas of Amenity Importance (AAI) has been undertaken as part of the RLDP evidence base. Areas that are privately owned and not accessible to the public have been excluded from the AAI designation. Consistent with this approach, land formerly designated as AAI in the Adopted Local Development Plan on land to the north of Monmouth Road is no longer allocated as AAI in the RLDP. Further details of the review can be found in the Areas of Amenity Importance Review.</p>	
1305 / MHA / Objection	Question the appropriateness of including an allowance for the last 4.75 years of the plan. By the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Believe that 230 is optimistic given the constraints identified in the Urban Capacity Study and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has been taken.	No change required.
1948 / Edward Rogers / Objection	Plan has a greater reliance on windfall housing in rural settlements which is unrealistic and cannot be relied upon. Excessive reliance on windfall housing will therefore undermine the plan.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). No windfall completions have been estimated for the rural settlements, however, approximately 203 homes are estimated to be delivered through small infill developments such as barn conversions and single dwellings. Consistent with the advice set out in the Development Plans Manual (2020), this is based on past trends, reduced by 15% to reflect the plan-led system	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		and reduced opportunities. The figure is therefore considered to be realistic and deliverable.	
3632 / Mr George RV Ashworth / Objection	The section entitled Housing Potential Study, and its Appendix 1 should not have included the Area of Amenity Importance north of Monmouth Road, Raglan.	<p>The Housing Potential Study (HPS) sets out where windfall allowances (sites of 10 or more dwellings) could potentially come from within the County and has been used as a basis for the windfall allowance in the housing supply components. Given the submission of a planning application on the privately owned site, the land has been included within the HPS to inform potential windfall sites. The planning application has been considered by Planning Committee, who resolved to approve the application subject to a S106 Agreement. The site is currently awaiting the signing of the S106 Agreement. The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes across the County. In this respect, a conservative approach to windfall provision has been taken.</p> <p>A review of the Areas of Amenity Importance (AAI) has been undertaken as part of the RLDP evidence base. Areas that are privately owned and not accessible to the public have been excluded from the AAI designation. Consistent with this approach, land formerly designated as AAI in the Adopted Local Development Plan on land to the north of Monmouth Road is no longer allocated as AAI in the RLDP. Further details of the review can be found in the Areas of Amenity Importance Review.</p>	No change required.

Gypsy and Traveller Accommodation Assessment (2021-2026)

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3059 / Magor with Undy Town Council / Objection	Report submitted by Lee Searles MRTPI of Andrea Pellegram Planning Consultants commissioned by MUTC to request the removal of sites at Langley Close and Dancing Hill from further assessment and consideration, so they remain free from development and retain their important functions.	Land at Langley Close and Dancing Hill have not been allocated in the RLDP for Gypsy and Traveller purposes.	No change required.

Areas of Amenity Importance Review

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3059 / Magor with Undy Town Council / Objection	Magor with Undy Town C acknowledge that there is no longer a legal requirement to protect the M4 safeguarding route to the boundary they are concerned that not designating area at Cowleaze as AAI could significantly decrease the amount of green open space in the future. Although formal recreation uses are defined in the review residents feel that this area is one of the few open spaces remaining and should be designated. Concerned that MCC have concluded that there is no need to designate the site as it is open countryside.	<p>The AAI designated in the Adopted LDP to the north of Magor and Undy (reference AAI0179 Cowleaze) had a boundary that aligned broadly with the M4 safeguarding route. As there is no longer a need to protect the M4 safeguarding route, the boundary of the AAI was considered to be arbitrary and did not follow a particular defined boundary. A large proportion of this AAI was also located outside of the development boundary in an area of open countryside. While it may have some informal use, it does not have a formal recreation use and due to its location does not meet the criteria to be designated as an Area of Amenity Importance as per the methodology set out in the AAI Review. In addition to this the majority of the land is privately owned and not accessible to the public. Paragraph 1.6 of the AAI Review refers to privately owned spaces, noting that such spaces are not accessible to the public and have been excluded from AAI as they do not fulfil the criteria for designation as AAI. Amendments have, therefore, been made to the boundary to exclude the northernmost section that is located outside the development boundary.</p> <p>While it is acknowledged there is a deficiency in Magor Undy in both formal and informal open space, this is not a reason to include land that does not meet the criteria for AAI designation. The RLDP provides a positive policy framework to enable the provision of new areas of open space, and to safeguard existing areas (policies CI2 and CI3 refer respectively).</p> <p>Additional detail is set out in the Open Space Study.</p> <p>It is, therefore, not considered appropriate to designate this area as an area of amenity importance in the RLDP.</p>	No change required.
3576 / Mrs Brenda Lloyd / Objection	Would like the designation of the land adjacent to Langley Close changed. Magor with Undy has been identified by Officers as woefully deficient of amenity space and the redesignation would protect the area. It is one of the last areas of green space and retained for future generations.	The AAI designated in the Adopted LDP to the north of Magor and Undy (reference AAI0179 Cowleaze) had a boundary that aligned broadly with the M4 safeguarding route. As there is no longer a need to protect the M4 safeguarding route, the boundary of the AAI was considered to be arbitrary and did not follow a particular defined boundary. A large proportion of this AAI was also located outside of the development boundary in an area of open countryside. While it may have some informal use, it does not have a formal recreation use and due to its location does not meet the criteria to be designated as an Area of Amenity Importance as per the	No change required.

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		<p>methodology set out in the AAI Review. In addition to this the majority of the land is privately owned and not accessible to the public. Paragraph 1.6 of the AAI Review refers to privately owned spaces, noting that such spaces are not accessible to the public and have been excluded from AAI as they do not fulfil the criteria for designation as AAI. Amendments have, therefore, been made to the boundary to exclude the northernmost section that is located outside the development boundary.</p> <p>While it is acknowledged there is a deficiency in Magor Undy in both formal and informal open space, this is not a reason to include land that does not meet the criteria for AAI designation. The RLDP provides a positive policy framework to enable the provision of new areas of open space, and to safeguard existing areas (policies CI2 and CI3 refer respectively).</p> <p>Additional detail is set out in the Open Space Study.</p> <p>It is, therefore, not considered appropriate to designate this area as an area of amenity importance in the RLDP.</p>	
3118/ Councillor Meirion Howells /Comment	Local survey included with representation notes that the play park at Cae Melin does not appear to be protected/recognised as protected space on the Proposals Map.	Comments noted. It is considered however that this is a small site that does not meet the criteria for designation as AAI protection (Policy CI4) but will contribute towards general open space requirements and will be recognised as protected open space under Policy CI3 of the Plan. Although no change is recommended to the AAI background paper, it is recommended to include the Cae Melin play area in the Open Space Study.	No change required.

Emerging GI Strategy 2024 Volume 1

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1412 / Natural Resource Wales (NRW) / Comment	GI Strategy does not form the masterplanning of sites - There is not a clear link between the opportunities identified in the GI Strategy and Delivery of the Plan (detail included in residential policies (HA1- HA18). The GI Strategy and Assessment should be influencing the spatial strategy and master planning at site level.	<p>The masterplanning at a site level will be influenced strategically by the GI strategy and more specifically on a case-by-case basis by the Landscape Sensitivity Assessment, GI SPG, draft Landscape SPG and GI Statement which collectively will guide development, along with the promoters' surveys and detailed assessment of the site(s). This will provide high-level assessment and analysis demonstrating that each site allocation has a sufficient envelope to deliver the quantum of development and its green infrastructure requirements.</p> <p>In addition, baseline information relating to key design and placemaking principles has already been signposted to the promoters of the sites, which provide a guiding framework from which strategic site allocation and subsequent applications can be progressed.</p> <p>This will demonstrate a clear link between the opportunities identified in the GI Strategy and Delivery Plan, to the detail included in the residential site allocation policies (HA1 - HA18), including the proposed schematics for strategic sites HA1 – HA4.</p>	No change required.

Open Space Study 2024

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3929 / Robert Hitchins Limited / Objection	Concerns with inclusion of OPS0205 and OPS0491 as Open Space due to their previous planning permissions and inadequate use as Open Space.	OPS0205 and OPS0491 have been removed from the updated Open Space Study as 'Amenity Greenspace', as on reflection it is noted that these are privately owned spaces and not publicly available.	Remove OPS0205 and OPS0491 from the Updated Open Space Study.
3118/ Meirion Howells/ Comment	Local survey included with representation notes concern that the play park at Cae Melin, Little Mill, does not appear to be protected/recognised as recreational open space.	Comments noted. It is recommended to include the children's play area in the updated Open Space Study.	Include Cae Melin play area in the updated Open Space Study.

Minerals Background Paper

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1819 / Minerals Products Association / Objection	<p>Disappointing that the RTS's requirements has not been addressed by the respective authorities. Section 4.4 of the background paper states: <i>'the potential does not exist at this stage to meet some or all of the carboniferous limestone apportionment allocations required for other LPAs within the former Gwent sub-region'</i>. Question why this has not been delivered in the Minerals Background Paper and the requirement to deliver the SSRC. Also note that the annual build rate for dwellings is above that used within the evidence base for the RTS, which may have consequences on the projected need for minerals to be identified in the SSRC.</p> <p>Have been advised that the information regarding the approved next phases of development at Ifton Quarry as referred to in sections 5.7 and 5.8 and Table 2 are incorrect. We understand that there is also no limit on annual extraction at Ifton Quarry as stated in Table 2 and would suggest the LPA clarifies the position with Heidelberg Materials Uk as soon as possible.</p>	<p>The Mineral Planning Authorities (MPAs) that make up the Former Gwent Sub-Region have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC), however, it has not been possible at this stage to confirm how the regional apportionment figures will be met due to specific ongoing circumstances that are referenced in the Position Statement, such as the outcome of planning applications and candidate site submissions in the sub-region. These influence the sub-region's ability to establish what the shortfall is, making it premature to approach other authorities. The preparation of a Position Statement, to be monitored and updated as circumstances change was therefore seen as a pragmatic way forward. This approach has been supported by Welsh Government in its representations on the Deposit RLDP. The SSRC: Position Statement has, however, been updated to reflect updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix.</p> <p>The information set out in paragraphs 5.7 and 5.8 of the Minerals Background Paper are factual references from the recent planning application and help provide an update on recent activity in relation to Ifton Quarry. Reference to the planning application in Table 2 of the Position Statement, will however, be removed to avoid any confusion with the figures set out in the RTS2. The SSRC: Position Statement has therefore been updated to reflect this and updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix.</p>	<p>No change to the RLDP required, however, the Minerals Background Paper has been updated to include an updated version of the Statement of Sub-Regional Collaboration: Position Statement to reflect the latest position with regards to the consideration of minerals related planning applications and candidate site assessments in the Minerals Planning Authorities making up the Former Gwent Sub-Region (Blaenau Gwent CBC, Torfaen CBC, Newport CC and MCC). Specific reference to the planning application relating to Ifton Quarry (reference DM/2023//01062) has been removed from Monmouthshire's information within Table 2: Former Gwent Sub-Region Apportionment Position</p>

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			of the Position Statement.