

# **Monmouthshire Replacement Local Development Plan**

## **Growth and Spatial Options Background Paper**

**June 2021**



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**Monmouthshire County Council  
Replacement Local Development Plan**

**Growth and Spatial Options  
Background Paper**

**June 2021**

**Planning Policy Service**

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## Contents

	<b>Page</b>
<b>1. Introduction</b>	1
<b>2. Growth Options</b>	2
<b>3. Spatial Options</b>	24
<b>4. Conclusion</b>	35

# 1 Introduction

## Background

1.1 The Council is preparing a Replacement Local Development Plan (RLDP) for Monmouthshire (excluding the part of the County that is within the Brecon Beacons National Park). The RLDP will identify where and how much new development will take place during the 'Plan period' (2018-2033). It will allocate land for development, identify areas to be protected, and contain policies to guide decisions on applications for planning permission. We aim to adopt the RLDP in autumn 2023.

## 1.2 Purpose of this paper

1.2.1 This is one of a series of background papers to support the Preferred Strategy. This background paper expands upon the work completed to date on the growth and spatial options and provides a summary of each of the options and an explanation of why the preferred options have been chosen and why specific options are discounted following evidence that has been collated and consultation undertaken to date.

1.2.2 The Council undertook a non-statutory consultation on a Growth and Spatial Options Paper (December 2020)<sup>1</sup> for a 4 week period from 4<sup>th</sup> January 2021 to 1<sup>st</sup> February 2021 to consider how much growth (homes and jobs) is needed over the RLDP period and where this growth should take place. A number of alternative growth and spatial options for the RLDP were identified within the December 2020 Options Paper, together with the implications of each option and the extent to which they would achieve the RLDP objectives. The December 2020 paper provides full analysis of each of the options and should be read alongside this background paper.

### Growth and Spatial Options

1.2.3 The Council commissioned Edge Analytics to prepare a range of demographic, housing and employment growth scenarios to inform the RLDP growth options. The 2018-based Welsh Government (WG) population and household projection variants formed the starting point of the scenario analysis. However, it is important to consider alternative scenarios to test the impacts of different assumptions over the Plan period. This approach reflects current national planning policy guidance as set out in PPW11 (February 2021, paragraphs 4.2.6-4.2.7), which requires LPAs to consider and provide for a level of housing that is based on various sources of evidence rather than just the WG projections. This includes having regard to what the Plan is seeking to achieve, links between homes and jobs, affordable housing need as evidenced by the Local Housing Market Assessment (LHMA), as well as deliverability of the Plan, in order to identify an appropriate strategy for housing delivery in the area. The outcomes from this modelling is set out in the Edge Analytics Updating the RLDP Demographic Evidence Paper (November 2020)<sup>2</sup>.

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<sup>1</sup> <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

<sup>2</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

- 1.2.4 Fourteen different scenarios were generated for Monmouthshire in the Edge Analytics Paper, with additional sensitivity testing undertaken for the demographic and dwelling-led scenarios. The purpose of the sensitivity testing is to address the County's unbalanced demographic, one of the key RLDP objectives, and one which has increased emphasis and importance in light of the Covid-19 pandemic and to address out-commuting, another key objective for the Plan.
- 1.2.5 From these fourteen different growth options, six were selected for consultation purposes. It should be noted that the growth outcomes of each scenario generated include that part of Monmouthshire that falls within the Brecon Beacons National Park. The six selected options were the subject of additional testing to establish the impact on demography, dwellings, household formation and employment of an affordable-housing policy-led element to the strategy. This is set out in detail in the Edge Analytics Affordable Housing Evidence Report (November 2020).<sup>3</sup>
- 1.2.6 As well as setting out options for the level of growth needed over the Plan period the RLDP must set out a clear spatial strategy for where this development should take place within the County. The consideration of realistic<sup>4</sup> growth and spatial options is an important part in the preparation of the RLDP, the purpose of which is to facilitate discussion and inform the Preferred Strategy consultation. In total six different spatial options were considered prior to the consultation, with four selected for consultation purposes. A full list of all the growth and spatial options is included as an appendix to the December 2020 Paper with an initial assessment and the reasons given for those options that were not taken forward for consultation.
- 1.2.7 The December 2020 Paper considers the population, household, dwelling and employment implications associated with each of the six alternative growth options and four spatial options, together with their wider implications for the County and the extent to which they will achieve the RLDP's objectives. All of the options consulted upon have been subject to an Initial Integrated Sustainability Appraisal (ISA), the outcome of this appraisal can be found in the ISA of Strategic Options Report (December 2020)<sup>5</sup> with a summary included within the December 2020 Paper.

## 2 Growth Options

- 2.1 As noted in paragraph 1.2.4, a total of fourteen growth scenarios were generated by Edge Analytics, of which six were taken forward to the December 2020 Paper<sup>6</sup> and consulted on. The Growth Options consulted on provide alternative growth strategy options to inform the level of dwelling and employment provision within the RLDP, having regard to national policy, the evidence base and policy aspirations. Based on

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<sup>3</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

<sup>4</sup> Paragraph 5.10 Development Plans Manual - Edition 3 (Welsh Government, March 2020)

<sup>5</sup> <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

<sup>6</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

the assessment contained in the Paper, Growth Option 5 Population-led projection (with added policy assumptions) was given as the Council’s preferred Growth Option.

- 2.5 Tables 1 to 6 below relate to the six growth options considered in the December 2020 Paper. An overview of each of the options is provided, including the associated dwelling requirement and job forecasts. A summary of the responses from the consultation on the Growth and Spatial Options Paper<sup>7</sup>, relationship with the RLDP objectives and ISA analysis<sup>8</sup> is also provided. An overall summary determines whether the option meets the needs/aspirations of Monmouthshire.

**Table 1 - Overview and Summary of Analysis of Growth Option 1**

<b>Option 1: Balanced Migration (with added policy assumptions) (Demographic-led)</b>				
<b>Assumptions</b>				
Internal and international migration flows are balanced between in- and out-flows, resulting in zero net migration. Household membership rates for the young adult age-groups (19-24, 25-29, 30-34) are adjusted to ‘return’ to their 2001 values between 2018-2033. Commuting ratio reduces from 2011 Census value (1.12) to 2001 Census value (1.10) over the Plan period. An average of 53dpa is added to the projected dwelling growth under this scenario between 2018-2033. This reflects a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.				
<b>Dwelling Requirement 2018 - 2033</b>	<b>Annual Dwelling Requirement 2018 - 2033</b>	<b>Housing Delivery Commitments**</b>	<b>Residual Dwelling Requirement 2021-2033</b>	<b>Residual Dwelling Requirement Per Annum 2021 – 2033</b>
-255	-17	4708	-4963	-414
<b>Jobs projected to 2033: -1800 projected job losses.</b>				
<b>Summary of Consultation Feedback</b>				
The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where the respondent disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Growth Option.				
This option was considered by some respondents to represent a serious commitment to climate change. It was felt that it was best placed to meet the objectives relating to place-making, communities, rural communities and infrastructure. It was felt that whilst pursuing this level of growth it could be extended to allow for some affordable housing but that this should be in locations with good employment opportunities, such as along the M4 corridor. This would balance housing growth with employment growth whilst reducing the need to travel. By locating development in this way this would preserve rather than ruin the character and identity of the towns. It was also stated that there was no logic in the proposal to build twice the number of new dwellings proposed by the Welsh Government				

<sup>7</sup> <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

<sup>8</sup> <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

in the three towns of Abergavenny, Monmouth and Raglan without first addressing job opportunities in these towns.

#### **Relationship with RLDP Objectives**

The balanced migration option performs poorly against the RLDP objectives. Of particular concern is the impact on the economy of the County and on the ability to meet the Council's purpose of creating sustainable and resilient communities. A declining working age population could result in job losses with the resident population unable to support local employment provision. In this respect, the growth level provides no opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic. The proportion of the older age groups would increase leading to an increasingly unbalanced demographic and a decline in the overall population. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not support/enable social sustainability and balanced communities across the County. Under this option there would be no requirement for additional housing although an ageing demographic would require a different type of housing to that currently available. With a net loss of dwellings there would be a reduction in the availability of both affordable and market dwellings and due to the lack of supply, the younger population would be priced out of much of the County further exacerbating the unbalanced demographic. This option would not address the County's affordability issues or build sustainable and resilient communities throughout Monmouthshire. There are also significant concerns about the particular impact on sustaining rural communities. There would be reduced support to help maintain rural facilities, and it would provide little opportunity to strengthen the rural economy or for people to stay in their local communities. This option could thus lead to increased levels of rural isolation.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 1 performs least well of the options against the ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities. It represents job growth at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce, as well as a declining customer base. This option performs notably worse when compared to the other options and through negative growth is considered likely to lead to negative effects of significance. This option would also not contribute towards meeting and sustaining sufficient land supply for the forthcoming Plan period, which could significantly impact upon the future vitality of communities. Not only will this option severely limit opportunities to address changing housing needs in terms of types and tenures, but the lack of growth is also likely to drive up house prices and exacerbate affordability issues. This option may also result in very limited opportunities for the younger population to live and work in the County and difficulties in sustaining services/ facilities across the County, exacerbating rural isolation. Negative effects against these ISA themes are considered likely to be of significance under this option.

There are considered to be no significant effects with regard to this option against the remaining ISA themes. With no growth proposed under this option it is considered likely that there will be marginal effects in terms of congestion on the existing highway network, although it is recognised that with no growth under this option it will not provide the critical mass to enable infrastructure improvements. As this option does not propose any further

growth it is also likely to avoid significant effects in relation to the natural resources, biodiversity and landscape ISA themes. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

### **Summary of Analysis**

Using the balanced migration option as the growth strategy for the RLDP would result in a negative residual dwelling requirement and adversely impact upon the Council's strategic ambitions from both an economic and social perspective. This option would be in conflict with proposed key elements of the RLDP objectives and of all of the options performs most poorly against the ISA objectives. The combination of the decrease in the working age population cohorts and an increase in the 60+ age cohort would not drive economic growth/prosperity; rather it would result in an outflow of workers and residents from the County. This would result in implications in terms of retaining younger people within the County to live and work. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.

The lack of new homes would also impact negatively on the provision of affordable housing. A restricted supply of homes could lead to higher house prices, thus making the County even less affordable to the younger working age population and perpetuating the demographic imbalance. A decline in the working age population in the County with a declining work force unable to support local employment provision would have a negative impact on the local economy. This would provide little opportunity to create a thriving, well-connected, diverse economy, which is a key RLDP objective and has been highlighted as being of particular importance in light of the current pandemic. The unbalanced demographic and lack of housing and economic opportunities would impact on the ability of the Council to deliver its core purpose of building sustainable and resilient communities that support the well-being of current and future generations.

It is acknowledged that as this growth option does not propose any further growth it is likely to avoid significant effects on factors relating to climate change. However, the RLDP must address the climate emergency whilst also delivering on other well-being aspects of the County, such as housing need, economic prosperity, and cohesive communities. Efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of resources and land and flood resilience.

Following a review of the responses received in reply to the consultation on the Growth Options, and in view of the negative impacts associated with this growth option and its poor performance against the RLDP objectives and identified ISA themes, it is not considered prudent to take this option forward as the preferred growth option for the RLDP.

\*\* Housing delivery commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations. For further detail with regard to how this figure has been calculated please refer to the Housing Background Paper (June 2021)<sup>9</sup>

**Table 2 - Overview and Summary of Analysis of Growth Option 2**

<b>Option 2: WG 2018-based Principal (AH) (Demographic-led)</b>				
<b>Assumptions</b>				
Replicates the WG 2018-based population projection. Migration assumptions are based on the five-year period prior to 2018 (i.e. 2013/14– 2017/18). An average of 71dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.				
<b>Dwelling Requirement 2018 - 2033</b>	<b>Annual Dwelling Requirement 2018 - 2033</b>	<b>Landbank Commitments**</b>	<b>Residual Dwelling Requirement 2021-2033</b>	<b>Residual Dwelling Requirement Per Annum 2021 - 2033</b>
+3930	+262	4708	-778	-52
<b>Jobs projected to 2033: +3120 additional jobs</b>				
<b>Consultation Feedback</b>				
<p>The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where the respondent disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Growth Option.</p> <p>This option was considered by some to be a realistic option for the RLDP as it replicates the Welsh Government 2018-based projection and it was felt that a strategy that relies on building substantially more market housing than is the projected need should not be pursued unless it is certain that it will be accompanied by local employment growth. It is considered to also represent a realistic build rate (262pa) as it is a continuation of the average build rate achieved over the last 15 years (269pa). It is also considered that as this option does not require any new allocations it is best placed to protect landscape character, biodiversity and minimise CO2 emissions whilst representing a low-risk strategy in a time of unprecedented uncertainty. Option 2 was the preferred growth option for some representors if pursued along with a focus to protect and enhance tourism, leisure and agricultural industries with small scale affordable housing and public transport improvements.</p>				
<b>Relationship with RLDP Objectives</b>				
This WG 2018-based Principal Projection option with the addition of a level of affordable housing growth, whilst performing marginally better than Option 1, also performs poorly against the RLDP objectives. Of particular concern is the impact on the economy of the County and on the ability to meet the Council’s purpose of creating sustainable resilient communities. It projects an overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment				

<sup>9</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years indicating that people will still need to leave the County to access employment, this would not meet the Council's ambitions for sustainable economic growth as the level of growth provides limited opportunities to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic. This option would result in an increase in the proportion of the older and elderly people living in the County leading to a more unbalanced demographic. There would be limited opportunities for the younger population to live and work in the County. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.

With a build rate lower than that achieved over the past 15 years, this option would not be able to offer the range or number of homes to address the demographic imbalance or the range of homes needed to attract the economically active age group and the type of homes the ageing demographic would require. It would provide limited opportunity to secure additional market and affordable housing. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments, including affordable housing. This option would not address the County's affordability issues or build sustainable and resilient communities throughout Monmouthshire.

There are also significant concerns about the particular impact on sustaining rural communities. There would be no additional support to help maintain rural facilities, nor would there be any rural developments to attract additional rural employment opportunities. This option could thus lead to increased levels of rural isolation.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 2 performs marginally better than option 1 against the ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities. Options 1 to 4 all represent job growth, albeit at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce, as well as a declining customer base. Uncertain effects are considered likely against the economy ISA theme for this option. Options 2 to 6 deliver gradually increasing levels of growth, it is assumed that as the level of growth increases, so does the ability to deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces and an improved public realm. On the whole impacts against these ISA themes are considered to be uncertain under this option.

There are considered to be no or uncertain effects with regard to this option against the remaining ISA themes. With limited growth under option 2 it is considered likely to lead to marginal effects in terms of congestion on the existing highway network, although it is recognised that the level of growth under this option is not likely to provide the critical mass to enable infrastructure improvements. In terms of biodiversity and landscape the increasing level of growth under options 2 to 6 is likely to require increasingly more land

take. This is considered likely to result in wider habitat loss and fragmentation as well as increased pressure; notably disturbance (through recreation, noise and light), atmospheric pollution, and through impacts on water quality and resources. The increasing level of growth under options 2 to 6 is likely to place higher pressure on greenfield land resources and result in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. Whilst it is likely that mitigation is available to reduce the significance of any effects, the residual effects remain uncertain at this stage until development locations are more clearly defined. Overall limited growth under option 2 is not considered likely to lead to effects of significance. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

### Summary of Analysis

Planning Policy Wales Edition 11 (February 2021) states that the latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a Plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the Plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the Plan, in order to identify an appropriate strategy for the delivery of housing in the Plan area. It goes on to say that appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a Plan area in order to ensure the creation of sustainable places and cohesive communities. Planning authorities are tasked with assessing whether the various elements of the projections are appropriate for their area, and if not, should undertake modelling, based on robust evidence, to identify alternative options.

The underlying assumptions from the 2018-based projections were used to prepare this particular option with the addition of a level of affordable housing growth. However, as with Growth Option 1, using this scenario as the growth strategy for the RLDP would result in a negative residual dwelling requirement and adversely impact upon the Council's strategic ambitions, from both an economic and social perspective. This option would be in conflict with proposed key elements of the RLDP objectives and after option 1 performs the most poorly against the ISA objectives. The combination of the decrease in the working age population cohorts and an increase in the 60+ age cohort would not drive economic growth/prosperity; rather it would result in an outflow of workers and residents from the County. This would result in implications in terms of retaining younger people within the County to live and work. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.

A decline in the working age population in the County with a declining work force unable to support local employment provision would have a negative impact on the local economy. This would provide little opportunity to create a thriving, well-connected, diverse economy,

which is a key RLDP objective and has been highlighted as being of particular importance in light of the current pandemic.

The lack of new homes would also impact negatively on the provision of affordable housing. A restricted supply of homes could lead to higher house prices, thus making the County even less affordable to the younger age population and perpetuating the demographic imbalance. The unbalanced demographic and lack of opportunities would impact on the ability of the Council to deliver its core purpose of building sustainable resilient communities that support the well-being of current and future generations.

It is acknowledged that as this growth option does not require new allocations it is likely to avoid significant effects on factors relating to natural resources and climate change. However, the RLDP must address environmental and climate emergency issues whilst also delivering on other well-being aspects of the County, such as housing need, economic prosperity, and cohesive communities. Efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of resources and land and flood resilience.

Whilst this option is considered by some in response to the consultation to represent a low-risk strategy at a time of unprecedented uncertainty, a Review of the Issues, Vision and Objectives was undertaken in June 2020 and concluded that they remain valid in light of Covid-19 and in some instances have increased in importance.

Following a review of the responses received in reply to the consultation on the Growth Options and in view of the negative impacts associated with this growth option and its poor performance against the RLDP objectives and identified ISA themes, it is not considered prudent to take this option forward as the preferred growth option for the RLDP.

\*\* Landbank commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations.

**Table 3 - Overview and Summary of Analysis of Growth Option 3**

<b>Option 3: WG 2018-based Principal Projection (with added policy assumptions) (Demographic-led)</b>				
<b>Assumptions</b>				
Replicates the WG 2018-based population projection. Migration assumptions are based on the five-year period prior to 2018 (i.e. 2013/14–2017/18). Household membership rates for the young adult age-groups (19-24, 25-29, 30-34) have been adjusted to 'return' to their 2001 values between 2018-2033. Commuting ratio reduces from 2011 Census value (1.12) to 2001 Census value (1.10) over the Plan period. An average of 76dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing				
<b>Dwelling Requirement 2018 - 2033</b>	<b>Annual Dwelling Requirement 2018 - 2033</b>	<b>Landbank Commitments**</b>	<b>Residual Dwelling Requirement 2021-2033</b>	<b>Residual Dwelling Requirement Per Annum 2021 - 2033</b>

+4770	+318	4708	+62	+4
<b>Jobs projected to 2033: +3975 additional jobs</b>				
<b>Consultation Feedback</b>				
<p>The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where the respondent disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Growth Option.</p> <p>This option with the additional focus on affordable housing was considered by some to represent a good balance, it would provide above average housing and employment growth and allow for in-migration whilst respecting Monmouthshire’s character and environment. It is considered a lower risk strategy when compared to the higher growth options as it is considered to represent an achievable and acceptable rate of growth that would address the aims of climate change. In addition given Covid-19 it is thought unlikely that rural Monmouthshire will achieve higher new job growth than the rate envisioned under this option. The suggestion was made that the growth under this option should be focussed on providing for the ageing demographic through the identification of retirement villages. One respondent considered that the assessment of this option against the RLDP objectives does not fairly reflect the likely outcomes from this option.</p>				
<b>Relationship with RLDP Objectives</b>				
<p>This WG 2018-based Principal Projection option with added policy assumptions, whilst performing better than options 1 and 2, there are still concerns with regard to its performance against certain key RLDP objectives. Of particular concern is the impact on demography and rural communities. This option would result in an increase in the proportion of the older and elderly people living in the County leading to a more unbalanced demographic, with very limited opportunities for the younger population to live and work in the County. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.</p> <p>This option is also considered to impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. With limited development there could be difficulties in sustaining services/facilities across the County which would result in increasing rural isolation.</p> <p>The build rate under this option would also not be able to offer the range or number of homes to address the demographic imbalance or the range of homes needed to attract the economically active age group and the type of homes the ageing demographic would require. There are opportunities under this option to secure some affordable housing but at this lower level it would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County’s affordability issues and to build sustainable and resilient communities throughout Monmouthshire.</p>				

Whilst there is an overall decline in the working age population in the County under this option there is some growth in the 35-44 age groups, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. This option provides limited opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.

### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 3 performs marginally better than options 1 and 2 against the ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities. Options 1 to 4 represent job growth, albeit at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce, as well as a declining customer base. Uncertain effects are considered likely against the economy ISA theme for this option. Options 2 to 6 deliver gradually increasing levels of growth, it is assumed that as the level of growth increases, so does the ability to deliver a greater range/mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces and an improved public realm. On the whole impacts against these ISA themes are considered to be uncertain under this option.

There are considered to be no or uncertain effects with regard to this option against the remaining ISA themes. With limited growth under option 3 it is considered likely to lead to marginal effects in terms of congestion on the existing highway network, although it is recognised that the level of growth under this option is not likely to provide the critical mass to enable infrastructure improvements. In terms of biodiversity and landscape the increasing level of growth under options 2 to 6 is likely to require increasingly more land take. This is considered likely to result in wider habitat loss and fragmentation as well as increased pressure on natural resources. However, residual effects remain uncertain at this stage reflecting the ability to mitigate effects at the site/ project level. Overall limited growth under option 3 is not considered likely to lead to effects of significance. The increasing level of growth under options 2 to 6 is likely to place higher pressure on greenfield land resources and result in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. Whilst it is likely that mitigation is available to reduce the significance of any effects, the residual effects remain uncertain at this stage until development locations are more clearly defined. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

### **Summary of Analysis**

Planning Policy Wales Edition 11 (February 2021) states that the latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a Plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the Plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the Plan, in order to identify an appropriate strategy for the delivery of housing in the Plan area. It goes on to say that appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a Plan area in order to ensure the creation of sustainable places and cohesive communities. Planning authorities are tasked with assessing whether the various elements of the projections are appropriate for their area, and if not, should undertake modelling, based on robust evidence, to identify alternative options.

In common with Option 2, key assumptions from the 2018-based projections were used to prepare this particular option, with added policy assumptions to address the key issues that the County faces. Despite including the policy assumptions, using this scenario as the growth strategy for the RLDP would result in virtually no residual dwelling growth over the remainder of the Plan period and would thus adversely impact upon the Council's strategic ambitions, from both an economic and social perspective. This option whilst performing marginally better than options 1 and 2 against the ISA themes would be in conflict with proposed key elements of the RLDP objectives. The combination of the decrease in the population of the working age cohorts and an increase in the 60+ age cohort would not drive economic growth/prosperity; rather it would result in an outflow of workers and residents from the County. This would result in implications in terms of retaining younger people within the County to live and work. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.

A decline in the working age population in the County with a declining workforce unable to support local employment provision would have a negative impact on the local economy. This would provide little opportunity to create a thriving, well-connected, diverse economy, which is a key RLDP objective and has been highlighted as being of particular importance in light of the current pandemic.

The lack of new homes would also impact negatively on the provision of affordable housing. A restricted supply of homes could lead to higher house prices, thus making the County even less affordable to the younger working age population and perpetuating the demographic imbalance. The unbalanced demographic and lack of opportunities would impact on the ability of the Council to deliver its core purpose of building sustainable resilient communities that support the well-being of current and future generations.

Whilst this option is considered by some in response to the consultation to represent a low-risk strategy at a time of unprecedented uncertainty, a Review of the Issues, Vision and Objectives was undertaken in June 2020 and concluded that they remain valid in light of Covid-19 and in some instances have increased in importance.

Following a review of the responses received in reply to the consultation on the growth options and in view of the negative impacts associated with this growth option and its poor performance against the RLDP objectives and identified ISA themes, it is not considered prudent to take this option forward as the preferred growth option for the RLDP.

\*\* Landbank commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations.

**Table 4 - Overview and Summary of Analysis of Growth Option 4**

<b>Option 4: : Dwelling-led Average (based on dwelling completion rates) (Dwelling-led)</b>				
<b>Assumptions</b>				
Annual dwelling growth is applied from 2020/21 onward, based on the last five years of completions (2015/16–2019/20). This gives an average annual dwelling growth of +310 pa in Monmouthshire. An average of 80dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.				
<b>Dwelling Requirement 2018 - 2033</b>	<b>Annual Dwelling Requirement 2018 - 2033</b>	<b>Landbank Commitments**</b>	<b>Residual Dwelling Requirement 2021-2033</b>	<b>Residual Dwelling Requirement Per Annum 2021 - 2033</b>
+6030	+402	4708	+1322	+88
<b>Jobs projected to 2033: +5460 additional jobs</b>				
<b>Consultation Feedback</b>				
The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where the respondent disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Growth Option.				
This option was the preferred option of a few respondents who considered that this level of growth would be more appropriate given the lower expected demand due to Brexit leading to lower economic growth. Although a preference for job growth in line with option 5 alongside the level of housing growth from this option was expressed.				
<b>Relationship with RLDP Objectives</b>				
This dwelling-led growth option which is based on the last five years of completions to 2020 with the addition of a level of affordable housing growth, performs better against the RLDP objectives than options 1 to 3, scoring positively on the objectives relating to economic growth and employment, housing, place making and health and well-being. The level of growth proposed under this option would provide a level of housing that would contribute to providing a wide ranging choice of homes for both existing and future residents. This level of development would also provide the opportunity to secure affordable as well as market homes. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County’s affordability issues and to build sustainable and resilient communities throughout Monmouthshire. Despite the lower average number of				

jobs available there is also projected to be a steady increase over the Plan period with the number of jobs available exceeding the 15 year average by 2030. This level of growth would encourage greater indigenous business growth and encourage inward investment. This growth option provides an opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.

One of the key objectives that this growth option fails to perform positively against although it does begin to address the issue, is that of the unbalanced demography in the County. Whilst it begins to address the unbalanced demographic through growth from a larger number of age groups, the level of growth from the younger age groups is at a low level. The majority of population growth is still coming from the over 60 age groups, with 45-59 declining, again resulting in an unbalanced demographic. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 4 performs better than the lower growth options against the ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities. . Options 1 to 4 represent job growth, albeit at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce, as well as a declining customer base. Uncertain effects are considered likely against the economy ISA theme for this option. Options 2 to 6 deliver gradually increasing levels of growth, it is assumed that as the level of growth increases, so does the ability to deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces and an improved public realm. On the whole impacts against these ISA themes are considered to be uncertain under this option.

There are considered to be no or uncertain effects with regard to this option against the remaining ISA themes. Whilst Option 4 proposes higher levels of growth that has greater potential for negative effects in terms of congestion, negative effects are not considered likely to be significant against the transport ISA theme. In terms of biodiversity as the level of growth increases through Options 4 to 6 so too does the potential significance of negative effects. However, the residual effects remain uncertain at this stage reflecting the ability to mitigate effects at the site/ project level.

As the additional growth under Options 2 to 6 increases it is likely to require increasingly more land take, placing greater pressure on greenfield land resources and resulting in wider impacts on the landscape across the County: this has the potential for long term negative effects. Alongside the potential for negative effects, it is recognised however that there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to secure and/or improve green infrastructure, public open space and recreation provision through planning gain. The nature and significance of effects will therefore ultimately be dependent on the exact location, design/ layout of development,

and the implementation of mitigation measures. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

**Summary of Analysis**

This option goes some way to addressing our issues and meeting our objectives in comparison to options 1 to 3, and performs well against the ISA themes. However, at this level of growth the impacts on addressing the issues and meeting our objectives are limited. This option represents a continuation of the dwelling growth rates from the past 5 years, i.e. ‘business as usual’. With the addition of the affordable housing policy-led element, this would result in average dwelling completions of 402 dpa over the Plan period which is below the adopted LDP dwelling requirement of 450 dpa. Growth at this level would result in a continuation of the trend towards an ageing demographic in the County. Whilst there is growth from a larger number of age groups, the level of growth coming from the younger age groups is at a low level. The majority of population growth is still coming from the over 60 age groups, with the 45-59 age groups declining, again resulting in an unbalanced demographic. Whilst this option projects a growth in jobs of 5,460, in terms of the average number of jobs in the County, this option still projects a lower level than over the previous 15 years. This would again result in implications in terms of retaining younger people within the County to live and work. The imbalanced demographic and lack of housing and economic opportunities would impact on the ability of the Council to deliver its core purpose of building sustainable and resilient communities that support the well-being of current and future generations.

Following a review of the responses received in reply to the consultation on the growth options and in view of the negative impacts associated with this growth option and its performance against the RLDP objectives and identified ISA themes, it is not considered prudent to take this option forward as the preferred growth option for the RLDP.

\*\* Landbank commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations.

**Table 5 - Overview and Summary of Analysis of Growth Option 5**

<b>Option 5: Population-led projection (with added policy assumptions) (Demographic-led)</b>
<b>Assumptions</b>
Internal in-migration rates are adjusted to reflect higher in-migration (based on the last 5-years) from Bristol and South Gloucestershire, following the removal of the Severn Bridge tolls. All other migration flow assumptions are consistent with the PG Long Term scenario. Household membership rates for the young adult age-groups (19-24, 25-29, 30-34) have been adjusted to ‘return’ to their 2001 values between 2018-2033. Commuting ratio reduces from 2011 Census value (1.12) to 2001 Census value (1.10) over the Plan period. An average of 94dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.

Dwelling Requirement 2018 – 2033	Annual Dwelling Requirement 2018 - 2033	Landbank Commitments**	Residual Dwelling Requirement 2021-2033	Residual Dwelling Requirement Per Annum 2021 - 2033
+7605	+507	4708	+2897	+193

**Jobs projected to 2033:** +7215 additional jobs

#### Consultation Feedback

The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where they agreed with the Preferred Growth Option. Respondents were also given the opportunity to object to this as the Preferred Growth Option and to state their option of choice. It should be noted that there was no opportunity within the consultation questions to object to other Growth Options.

Those respondents who considered that this growth option addresses the key challenges and issues that the RLDP needs to tackle felt that many of the issues faced by the County have been exacerbated by Covid-19 and Brexit. It is considered that a lower growth rate would further exacerbate the existing issues and challenges and lead to further demographic imbalance, displace the indigenous population and continue to push up house prices and create further shortages of skills and workforce. It is considered that this option responds to the underperformance/delivery of Adopted LDP sites and that the housing and job growth levels under this option will provide a long-term, robust approach towards future post Covid-19 and Brexit recovery. The proposed growth levels will enable a boost in the resident labour force to support new jobs in Monmouthshire and will seek to deliver the wider Council aspirations identified in the Economies of the Future Report and provide potential for Monmouthshire to play a role in helping provide homes and employment opportunities to meet the aspirations of the Cardiff Region City Deal. Although it was stated that whilst the growth level is supported this needs to be backed by the identification of viable and deliverable sites. The methodology and assumptions forming the basis for this option are considered to reflect recent in-migration patterns, particularly from Bristol, the impact of the removal of the Severn Bridge tolls and the potential long-term shift in employment working patterns as a result of Covid-19.

Conversely there were respondents who considered that the level of growth proposed will only be achieved as a result of in-migration from Bristol. It was maintained that this option represents a departure from the Welsh Government 2018 population projections for Monmouthshire and the population statistics from the ONS and that it is not in conformity with Future Wales which directs growth to Cardiff, Newport and the Valleys. It is also felt that it is incompatible with the Council's Climate Emergency Declaration, and will lead to an increase in air pollution and congestion through increased out-commuting. The level of growth proposed will be potentially damaging to the character and landscape of the County, particularly adjacent to the Brecon Beacons National Park and will result in more greenfield development on Best and Most Versatile agriculture land which is a finite resource. Overall it was considered by some respondents that this option represents an overly ambitious and undeliverable Strategy which will place additional strain on infrastructure whilst not addressing the issues of the existing ageing population and the

County's rural communities. There is no evidence that the County will attract greater employment growth especially at such a time of economic uncertainty linked to Brexit and Covid-19.

There were a number of respondents who considered that this option does not provide an adequate level of growth to address the issues and challenges facing the County and would not provide sufficient growth or leverage for City Deal investment to be targeted in the area.

#### **Relationship with RLDP Objectives**

Of all of those considered, the population-led with added policy assumptions option, performs the most positively against the RLDP objectives. This option would result in a growth in jobs of 481 pa. The fundamental shift in working practices seen since the start of the Covid-19 pandemic which has resulted in an increased propensity to work from home/remotely is expected to continue over the longer term. This provides residents with the opportunity to both live and work in the County in this new way, providing a flexible approach to achieving this level of job growth, whilst also achieving the Welsh Government and Council's aim of reducing the need for commuting. It would encourage greater indigenous business growth and encourage inward investment. It will provide the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic and would assist in building sustainable and resilient communities.

This level of growth results in an evening out of the age profile with growth coming from a broader cross section of the demographic. Whilst there continues to be growth in the over 60 age groups there is a corresponding growth in the key 30-49 age groups, with growth mirrored in the 0-19 age groups. Thus this option captures increased in-migration in the key labour force age groups. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option shows significant progress in achieving a more balanced demographic.

This growth option will provide a level of housing that is sufficient to provide a wide ranging choice of homes for both existing and future residents. The level of growth will provide opportunities to secure more significant affordable housing through the planning system. This option represents a dwelling growth rate of 507 dpa over the Plan period. The adopted LDP has a dwelling growth rate of 450dpa, the proposed level of growth under the preferred option is considered to be aspirational whilst at the same time being achievable with regard to past development rates. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire. Importantly the proposed level of growth and more balanced demographic, with new development providing opportunities throughout the County, will help support the rural economy and address rural isolation.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 5 performs positively against the ISA themes relating to the economy and employment and population and communities. Both Options 5 and 6 seek higher

economic growth levels than Options 1 to 4 and as a result, are expected to perform better in relation to the employment ISA theme. The housing growth proposed alongside economic development also seeks to address potential demographic imbalances with growth in key working age groups. Both Options are considered likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Both Options provide opportunities to encourage a more diverse and vibrant economy, significant long-term positive effects are anticipated under both Options 5 and 6. However it is considered that Option 5, by more closely aligning with past delivery rates presents a more realistic option. As a result, significant positive effects are considered likely under Option 5 against these ISA themes.

Option 5 also performs highly against the ISA themes relating to health and wellbeing, equalities and transport. Whilst Options 5 and 6 propose a higher level of growth that has greater potential for negative effects in terms of congestion, negative effects are not considered likely to be significant and it is recognised that Options 5 and 6 provide greater critical mass to enable more significant infrastructure improvements.

There are considered to be no or uncertain effects with regard to this option against the remaining ISA themes. In terms of biodiversity the increasing level of growth under options 2 to 6 is likely to require increasingly more land take. This is considered likely to result in wider habitat loss and fragmentation as well as increased pressure on natural resources. Despite this, it is recognised that a higher level of growth could also offer greater opportunities for delivering biodiversity net gain, securing and/ or enhancing green infrastructure, public open space and recreation provision through planning gain. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors. Residual effects therefore remain uncertain at this stage reflecting the ability to mitigate effects at the site/ project level.

All of the options, with the exclusion of Option 1, are likely to require increasingly more land, placing higher pressure on greenfield land resources and resulting in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. Whilst it is likely that mitigation is available to reduce the significance of any effects, the residual effects remain uncertain at this stage until development locations are more clearly defined. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

#### **Summary of analysis**

Growth Option 5 - Population-led projection (with added policy assumptions) is the Council's preferred growth option. It performs the most positively against the RLDP objectives and better overall against the ISA themes than any of the other five options. This option provides a level of growth that would best address the County's key issues/challenges and meet the RLDP objectives, it is considered to be sufficiently

ambitious and robustly justified. This option shows significant progress in achieving a more balanced demographic, with an increase in the working age cohorts, it will also drive economic growth/prosperity providing the opportunity to create a thriving well-connected diverse economy, which is a key RLDP objective.

This level of growth will enable the provision of a sufficient range and choice of homes, both market and affordable, the need for which has been heightened by the current pandemic. This option will also assist in ensuring our communities are balanced and socially sustainable, particularly in terms of demography, which is a key RLDP objective and the importance of which has again been clearly demonstrated during the current pandemic.

The level of employment growth under this option will assist in reducing the need to travel / levels of out-commuting, and promote self-contained communities. There has been a fundamental shift in working practices since the start of the Covid-19 pandemic with an increased propensity to work from home/remotely. It is expected that this trend will continue over the longer term and in accordance with Welsh Government’s ambition of 30% of the Welsh workforce working from or near home is something that we wish to encourage and enable. This provides residents with the opportunity to both live and work in the County in this new way, providing a flexible approach to achieving the level of job growth under this option, whilst also achieving the Welsh Government and Council’s aim of reducing the need for commuting. Appropriately located growth will increase the customer base and workforce, supporting local facilities, businesses and services and enable the creation of sustainable vibrant communities and ‘20 minute neighbourhoods’<sup>10</sup> The increased reliance on access to local facilities and services during the current pandemic, has highlighted their importance to our communities. This option would best meet the needs of and support the communities of Monmouthshire by providing a level of growth which will provide opportunities to secure affordable housing, improvements to infrastructure and potential to maximise opportunities to secure and/or enhance green infrastructure, public open space and recreation provision throughout the County.

Following a review of the responses received in reply to the consultation on the growth options and its performance against the RLDP objectives and identified ISA themes this option remains the Council’s preferred option. Overall, this option is considered to be the most conducive to achieving the RLDP vision and the Council’s core purpose of building sustainable and resilient communities across Monmouthshire.

\*\* Landbank commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations.

**Table 6 - Overview and Summary of Analysis of Growth Option 6**

<b>Option 6: Employment-led projection (with added policy assumptions) (Employment-led)</b>
<b>Assumptions</b>

<sup>10</sup> 20 Minute Neighbourhoods are strong, well connected neighbourhoods where people live within a 20 minute walking distance of key everyday services.

Commuting ratio reduces from 2011 Census value (1.12) to 2001 Census value (1.10) over the Plan period. Economic activity rate adjustments in line with the OBR forecast, unemployment rate remains at current value (2019) (2.9%). An average of 124dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.

<b>Dwelling Requirement 2018 - 2033</b>	<b>Annual Dwelling Requirement 2018 - 2033</b>	<b>Landbank Commitments**</b>	<b>Residual Dwelling Requirement 2021-2033</b>	<b>Residual Dwelling Requirement Per Annum 2021 - 2033</b>
+9060	+604	4708	+4352	+290

**Jobs projected to 2033:** +9630 additional jobs

### Consultation Feedback

The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Growth Option, the following comments were made where the respondent disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Growth Option.

The majority of the respondents who preferred this option also expressed a preference for option 5 but felt that there is scope for higher growth. It is considered that this option performs only marginally worse than the preferred option with regards to the RLDP objectives and that any issues could be addressed through the spatial strategy. This option was considered by some respondents to have positive implications, in that it would go further than the preferred growth option in addressing the County's demographic imbalance, small working age population and high house prices and would align with Council & Cardiff Capital Region Aspirations.

Respondents felt that this option aligns both with the aims and objectives of the Economies of the Future Report (2018) and with Welsh Government post Covid-19 Policy. In that it would assist with the region's economic growth as part of the Cardiff Capital Region City Deal and investment fund. Recognising that the removal of the Severn Bridge tolls has accelerated plans for a 'Western Gateway' that aims to capitalise on the combined potential of south Wales and the west of England. It is felt this rate of growth addresses previous under-performance and reflects increased in-migration from Bristol.

Respondents also felt that this growth option aligns with Welsh Government's Building Better Places policy document which recognises that planning will play a significant role in the Covid-19 recovery, with the housing industry a critical component of the economic bounce back and a key driver of the future growth and distribution of population. It also recognises a considerable degree of change to working and commuting patterns due to Covid-19, such as increased levels of home working. A lower level of commuting enables residents to stay local and reduce car dependency

Overall respondents felt that growth option 6 will help achieve Planning Policy Wales's Placemaking agenda, it has the potential to deliver balanced and socially sustainable

communities and provide necessary infrastructure improvements, with this level of growth having a better chance of achieving the affordable housing targets identified by Welsh Government.

#### **Relationship with RLDP Objectives**

This growth option performs poorly against the RLDP objective relating to minerals and waste as it is considered that the high level of employment and housing growth that results from this option may impact on the safeguarding of the County's mineral resource as much of the south of the County is subject to minerals safeguarding. It is also recognised that given the limited opportunities for development on brownfield land and lower grade agricultural land much of the development would be on higher grade greenfield land.

In contrast, this option performs positively against the RLDP objectives relating to economic growth and employment, demography, health/wellbeing, housing, place-making, and communities. This growth option would lead to a more balanced demography with an increase in the number of older and elderly people living in the County matched by an increase in the younger age groups with greater provision of dwellings and jobs increasing the opportunities for the younger population to both live and work in Monmouthshire. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would address the demographic imbalance in the County.

This option would provide a level of housing that is sufficient to provide a wide ranging choice of homes for both existing and future residents. The level of growth would provide opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire. With provision likely throughout the County it would support existing services and facilities and provide opportunities to support the rural economy and address rural isolation. Having said this, this option represents a dwelling growth rate of 604 dpa over the Plan period. This is higher than the level of dwelling growth experienced over the past 15 years and is significantly higher than the adopted LDP requirement so there is a level of uncertainty in relation to deliverability.

Under this option job growth is significantly higher than that achieved under the other options. The fundamental shift in working practices seen since the start of the Covid-19 pandemic which has resulted in an increased propensity to work from home/remotely is expected to continue over the longer term. This provides residents with the opportunity to both live and work in the County in this new way, providing a flexible approach to achieving this level of job growth, whilst also achieving the Welsh Government and Council's aim of reducing the need for commuting. Option 6 provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

Growth Option 6 performs positively against the ISA theme relating to the economy and employment and population and communities, there are no or uncertain effects against the remaining ISA themes. Both Options 5 and 6 seek higher economic growth levels than Options 1 to 4 and as a result, are expected to perform significantly better in relation to the employment ISA theme. The housing growth proposed alongside economic development also seeks to address potential demographic imbalances with growth in key working age groups. Both Options are considered likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Both Options provide opportunities to encourage a more diverse and vibrant economy, significant long-term positive effects are anticipated under both Options 5 and 6. However, the assumption in relation to higher levels of growth should also consider limits to growth and reflect the need to balance growth aspirations with realistic achievability. Considering this, it is not considered appropriate to rank Option 6 higher than Option 5, reflecting a marginally higher uncertainty in relation to achievability.

Option 6 delivers the highest level of growth of all of the options, and it is assumed that as the level of growth increases, so does the ability to deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development. However, it is noted with both options 5 and 6 that there is a need to manage the impacts of growth on local infrastructure capacity so that it does not place unnecessary burdens on existing infrastructure.

The option also performs highly against the ISA theme relating to transport. Whilst Options 5 and 6 propose a higher level of growth that has greater potential for negative effects in terms of congestion, negative effects are not considered likely to be significant and it is recognised that Options 5 and 6 provide greater critical mass to enable more significant infrastructure improvements.

There are considered to be no or uncertain effects with regard to this option against the remaining ISA themes. In terms of biodiversity the increasing level of growth under options 2 to 6 is likely to require increasingly more land take. This is considered likely to result in wider habitat loss and fragmentation as well as increased pressure on natural resources. Despite this, it is recognised that a higher level of growth could also offer greater opportunities for delivering biodiversity net gain, securing and/ or enhancing green infrastructure, public open space and recreation provision through planning gain. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors. Residual effects therefore remain uncertain at this stage reflecting the ability to mitigate effects at the site/ project level.

All of the options, with the exclusion of Option 1, are likely to require increasingly more land take, placing pressure on greenfield land resources and resulting in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape

interests and rural character with the potential for long term negative effects. Whilst it is likely that mitigation is available to reduce the significance of any effects, the residual effects remain uncertain at this stage until development locations are more clearly defined. Given the higher levels of growth under Options 5 and 6, there is greater potential negative effects of significance overall against the Landscape ISA theme. At this stage it is concluded that it is not possible to identify any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options is likely to have a significant effect on the Welsh language.

### Summary of Analysis

This option results in substantial growth in the County's population and would be a significant uplift on the current dwelling delivery levels. It would result in a positive impact on demography with an increase in the number of older and elderly people living in the County balanced against an increase in the working age groups and greater provision of dwellings and jobs, increasing the opportunities for the younger population to both live and work in Monmouthshire. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. It would provide a level of housing that is sufficient to provide a wide ranging choice of homes for both existing and future residents. The level of growth would provide opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.

There is a high level of job creation combined with a reduction in the commuting levels from those recorded at the time of the 2011 Census, so an increased amount of the employment generated would be for residents of the County. However, there is a level of ambiguity with regard to the employment-led options given the uncertainty associated with economic forecasts, particularly in the current economic climate surrounding Covid-19 and Brexit and their potential future impact on the national and local economy. The Council recognises that this option performs strongly against the RLDP Objectives and ISA themes, however, it is considered in the ISA that Option 5, by more closely aligning with past delivery rates, presents a more realistic option. Informal feedback from Welsh Government officials has also indicated a lack of confidence in economic-led projections. Whilst the Council has an aspiration to create a thriving well-connected, diverse economy, and is making progress towards this goal, it recognises the uncertainty around the effects of the employment-led scenarios on population/housing growth when compared with the demographic and housing-led options. Considering this, the Council does not propose to use an economic-led scenario as a basis for the preferred growth option.

\*'Radical Structural Change' (RSC) scenarios consider the potential impact of substantial economic changes in Monmouthshire's economy, resulting in a significantly higher employment growth range than under the 'Baseline' and UK Growth equivalent. Under these scenarios, employment growth ranges from +3,930 to +8,400 jobs over the Plan period, averaging +262 and +560 per annum respectively.

\*\* Landbank commitments comprise dwelling completions 2018-21, existing land supply commitments, windfall allowance, small sites allowance, LDP rollover allocations.

### 3 Spatial Options

- 3.1 As noted in paragraph 1.2.6, a total of six Spatial Options were initially considered and included in the long list of Spatial Options (set out in Appendix 6 of the Growth and Spatial Options Paper<sup>11</sup>) but two were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, four Spatial Options were consulted on as part of the Growth and Spatial Options Consultation. Based on the assessment contained in the Consultation Paper, Spatial Option 2 Distribute Growth Proportionately across the County’s most Sustainable Settlements, was given as the Council’s preferred Spatial Option.
- 3.2 The four Spatial Options considered for consultation purposes are set out in Tables 7 to 10 below. An overview of each of the options is provided outlining the proposed spatial distribution of development. A summary of the responses from the consultation on the Growth and Spatial Options Paper<sup>12</sup>, relationship with the RLDP Objectives and Initial Integrated Sustainability Appraisal (ISA) analysis is also provided. An overall summary determines whether the option meets the needs/aspirations of Monmouthshire.

**Table 7 - Overview and Summary of Analysis of Spatial Option 1**

<b>Option 1: Continuation of the Existing LDP Strategy</b>
This option replicates the existing Adopted LDP Strategy, which distributes growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development would be accompanied by new employment opportunities, where possible.
<b>Consultation Feedback</b>
The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Spatial Option, the following comments were made where they disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Spatial Option.
This option was considered to be the most sustainable option by some respondents due to the focus of growth towards the Main Towns of Abergavenny, Chepstow and Monmouth. It was considered that this option could limit the need to travel through the offer of multiple transport modes which would have a resultant reduction of congestion and emissions. The provision of new residential development in locations close to where people work was welcomed, it was considered that this option would balance conflicting needs of economic development and housing. It would also allow for resources to be focused on specific infrastructure projects rather than being spread across the whole of the County. It was suggested that this option appears most equitable ensuring some rural communities would be less isolated. It would protect the green belt and green wedge

<sup>11</sup> <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

<sup>12</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

areas in the South of the County and would support and enhance the natural beauty, promoting tourism, hospitality and retail opportunities.

It was also noted that this approach was most in keeping with national guidance and supported by Future Wales: 2040 which points to a town centre first approach.

#### **Relationship with RLDP Objectives**

The continuation of the existing LDP strategy option performs well against the RLDP objectives. It scores positively on objectives relating to demography, housing, communities and economic growth/employment. This option would provide growth in sustainable areas that have existing access to facilities, active travel and public transport links and employment opportunities, supporting placemaking. The value of placemaking has been emphasised in light of the Covid-19 pandemic. It would provide both market and affordable housing across the Main Towns, Severnside area and Secondary Settlements as well as some of the rural settlements, enabling provision of housing across all housing market areas. The Covid-19 pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.

This option would nevertheless result in increased pressure on existing infrastructure and facilities. It is recognised that there are currently some infrastructure capacity issues in the main towns which would need to be addressed to enable further significant growth. Other potential concerns relate to further pressure on the natural environment surrounding Main Towns as well as potential impact on their heritage. However, it is recognised this would be dependent on the level and design of new development and location of allocations and potential impacts could be mitigated against.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

The findings of the ISA note that this option, performs positively, and is found to have the potential for significant long term positive effects against the ISA themes relating to economy/employment, population/communities, health/wellbeing and equalities compared to the other options. This option focuses growth in the Main Towns, with some development in Severnside where there is greater need and better access to public transport, existing employment and facilities/services. Option 1 also scores positively in regard to equalities as it seeks to support and sustain a hierarchy of vibrant centres across the County, directing the majority of growth to the most sustainable settlements while also still delivering some growth in the secondary settlements and rural areas. The ISA appraisal notes Option 1 would perform positively in terms of providing housing to meet the identified needs of the County and would provide affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population. Additionally, opportunities to maximise levels of self-containment of existing settlements are more likely to be taken through Option 1, addressing localised economic issues and supporting a well-connected diverse economy. Furthermore, Options 1 is anticipated to lead to long term positive effects through reducing inequalities between rural and urban areas, along with supporting and sustaining a hierarchy of vibrant town and village centres across the County as a whole, which have been highlighted of particular importance during the current pandemic. The ISA notes that this option will likely positively address

existing demographic issues, encouraging younger people to reside and work in the County.

The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment theme, noting that all options have the potential to result in negative effects. However, it is recognised the mitigation could be provided and development has the potential to deliver positive effects secured at the project scale. Given the precise location of growth is unknown at this stage, all options were found to have an uncertain effect on landscape and climate change themes. All options have the potential to result in negative effects for natural resources, albeit it is recognised that mitigation could be provided and the nature and significance of effects will be dependent on the scale and location of development. The ISA found that similar conclusions could be drawn in relation to biodiversity given the presence of international, national and local designations throughout the County. It was noted that the options can however be differentiated in relation to nutrient neutrality implications on the River Wye and River Usk SACs. The RLDP HRA (2021) concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications because they are served by Waste Water Treatment Works discharging into the upper reaches of both SACs. Options 1 and 2 direct growth to these Primary Settlements and would result in a negative effect on the biodiversity ISA theme but are ranked higher than Option 4 which is considered the worst performing option.

The findings in the ISA note that while there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes. As a consequence and as a comparison of all four options, Spatial Options 1 and 2 perform the best overall.

### **Summary of Analysis**

A continuation of the existing strategy performs well against both the RLDP objectives and the ISA themes and addresses many of the key challenges and issues facing the County. It is considered that the existing LDP Strategy is working well, as demonstrated in the LDP Annual Monitoring Reports. While growth would be primarily directed towards the Main Towns which are the County's most sustainable settlements, any infrastructure capacity issues and potential environmental impacts would need to be addressed as part of the Plan preparation process.

Whilst the existing strategy is working well in terms of housing delivery in the County's Main Towns and Severnside, it is recognised that the proposed level of growth in rural areas has not been fully achieved and the overall delivery of affordable housing as a result has not been sufficient. In addition, although housing is being delivered on the strategic sites, the provision of employment opportunities on these sites has not been fulfilled for all of the Strategic Mixed-use sites, with only Wonastow Road delivering employment uses on site to date. It is recognised that there is a need to link housing and employment growth and any future employment allocations will be based on the findings of the Employment Land Review and other Council aspirations.

Following a review of the responses received in reply to the consultation on the Spatial Options and in view of the assessment above, it is not considered prudent to take Spatial Option 1 forward.

**Table 8 - Overview and Summary of Analysis of Spatial Option 2**

<b>Option 2: Distribute Growth Proportionately across the County's most Sustainable Settlements.</b>
Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements <sup>13</sup> with the level of growth proportionate to that settlement's size and amenities, affordable housing need as identified in the LHMA, the capacity for growth and/or the need for development to sustain the community.
<b>Consultation Feedback</b>
<p>The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Spatial Option, the following comments were made where they agreed with the Preferred Spatial Option. Respondents were given the opportunity to object to this as the Preferred Spatial Option, however, it should be noted that there was no opportunity within the consultation questions to object to other Spatial Options.</p> <p>It was recognised that distributing growth proportionately between settlements will focus growth on a fair and equitable basis across the Sustainable Settlements and will allow for more flexibility. It was welcomed that the level of growth will be based on need and potential to accommodate this growth, rather than being based solely on settlement size, it was also noted that proportionate growth will help serve all of the communities within Monmouthshire ensuring the provision of housing will be achieved across the whole of the County including rural areas. In addition, it was recognised that employment growth in sustainable locations would assist in reducing the need to travel, reduce out-commuting and promote self-contained communities.</p> <p>The consultation responses also acknowledged that Spatial Option 2 will assist in achieving a more balanced population by allowing for an increase in both market and affordable housing provision as well as job growth. It also seeks to provide a range of housing to meet all needs, improve the balance of age profile including through the retention of the younger and working age population. It was recognised that this option will improve access to affordable housing across the County and allow young people to stay in their local area. It was considered that a balance of housing delivery in both the towns and rural locations will help sustain other facilities such as local schools and that a more balanced demography will assist in maintaining social infrastructure and the future vitality of settlements. It will also assist in sustaining existing services and facilities while securing new facilities where they do not currently exist.</p>

<sup>13</sup> As identified in the Sustainable Settlement Appraisal (June 2021). This considers settlements in terms of their location, level of service provision, capacity and their role and function within the area.

It was also noted that Spatial Option 2 was the best fit with wider Welsh Government Policy aspirations and reflects the requirements of both Planning Policy Wales and Future Wales: the National Plan 2040.

There were nevertheless some concerns relating to the Preferred Spatial Option. It was considered that there would be more focus on Main Towns as small sites will unlikely be developed. It was also suggested that it would increase the proportion of residents in the South of the County and would consequently fail to address problems associated with more isolated locations including rural villages that have existing sustainability issues. It was considered by some that housing growth should be focused on areas where there is easy access to employment such as Bristol, Newport, Cardiff and the M4 corridor. Conversely, it was suggested that due to previous development in the Chepstow and Caldicot area these areas should be excluded from development. It was felt that there would be additional strain on existing infrastructure and associated services and that there would be less overall development of scale resulting in a missed opportunity to secure substantial infrastructure investment. While it was recognised that the Preferred Spatial Option seeks to secure more local affordable housing, it could result in unsustainable growth in rural areas. There were also concerns relating to specific areas such as; potential landscape impact on the Brecon Beacons National Park and impact on Chepstow due to existing traffic congestion and poor air quality.

#### **Relationship with RLDP Objectives**

The Proportionate Growth Option performs favourably against the RLDP objectives. Like Option 1, it scores positively on objectives relating to demography, housing, communities and economic growth/employment. This option would provide growth in sustainable areas that have existing access to facilities, active travel and public transport links and employment opportunities, thereby supporting placemaking. The value of placemaking has been emphasised in light of the Covid-19 pandemic.

It would provide both market and affordable housing across the Primary Settlements, Severnside area and Secondary Settlements as well as the Rural Settlements, enabling provision of housing across all housing market areas. The Covid-19 pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.

Growth would be provided in the most sustainable areas of Monmouthshire and at the same time would provide opportunities for specific rural areas to become more sustainable, by helping support facilities in existing settlements, particularly in those areas where facilities are struggling/declining. It could also attract additional facilities to these areas. The increased reliance on access to local facilities and services during the current pandemic, has highlighted their importance to communities. The role and function of the high street in the local community has also been highlighted of particular importance in the Covid-19 pandemic.

The Covid-19 pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.

This option would support/enable social sustainability and balanced communities across the County.

Potential concerns relate to further pressure on the natural environment and heritage across a number of areas within the County. However, it is recognised this would be dependent on the level of development and location of allocations and any potential impact could be mitigated against.

### **Integrated Sustainability Appraisal (ISA) Analysis**

The ISA appraisal considers that Option 2 would perform positively and has the potential for significant long-term positive effects against the ISA themes relating to economy/employment, population/communities, health/wellbeing and equalities compared to the other options. This option focuses growth in the Primary Settlements, with some development in Severnside where there is greater need and better access to public transport, existing employment and facilities/services. Option 2 also scores positively in regard to equalities as it seeks to support and sustain a hierarchy of vibrant centres across the County, directing the majority of growth to the most sustainable settlements while also still delivering growth in the Secondary Settlements and Rural Settlements. The ISA appraisal notes Option 2 would perform positively in terms of providing housing to meet the identified needs of the County and would provide affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population. Additionally, opportunities to maximise levels of self-containment of existing settlements are more likely to be taken through Option 2, addressing localised economic issues and supporting a well-connected diverse economy. Furthermore, Options 2 is anticipated to lead to long term positive effects through reducing inequalities between rural and urban areas, along with supporting and sustaining a hierarchy of vibrant town and village centres across the County as a whole, which have been highlighted of particular importance during the current pandemic. The ISA notes that this option will likely positively address existing demographic issues, encouraging younger people to reside and work in the County.

The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment theme, noting that all options have the potential to result in negative effects. However, it is recognised the mitigation could be provided and development has the potential to deliver positive effects secured at the project scale. Given the precise location of growth is unknown at this stage, all options were found to have an uncertain effect on landscape and climate change themes. All options have the potential to result in negative effects for natural resources, albeit it is recognised that mitigation could be provided and the nature and significance of effects will be dependent on the scale and location of development. The ISA found that similar conclusions could be drawn in relation to biodiversity given the presence of international, national and local designations throughout the County. It was noted that the options can however be differentiated in relation to nutrient neutrality implications on the River Wye and River Usk SACs. The RLDP HRA (2021) concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications because they are served by Waste Water Treatment Works discharging into the upper reaches of both SACs. Options 1 and 2 direct growth to these Primary Settlements and would result

in a negative effect on the biodiversity ISA theme but are ranked higher than Option 4 which is considered the worst performing option.

The findings in the ISA note that while there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes. As a consequence, and as a comparison of all four options, Spatial Options 1 and 2 perform the best overall.

#### **Summary of Analysis**

This option would provide proportionate growth in the County's most sustainable urban and rural areas, in accordance with the Sustainable Settlement Appraisal. It is considered that this spatial option provides a land use framework that will help deliver the Council's core purpose of helping to build sustainable and resilient communities for current and future generations. Fundamentally, this option will enable the provision of a sufficient range and choice of homes, both market and affordable to be provided throughout the County's most sustainable settlements, the need for which has been heightened by the current pandemic. This option will also assist in ensuring our communities are balanced and socially sustainable, particularly in terms of demography, which is a key RLDP objective and the importance of which has been clearly demonstrated during the current pandemic. Likewise, it addresses employment growth and resilience by directing growth to sustainable locations across the County, which will assist in reducing the need to travel/levels of out-commuting and promoting self-contained communities. It is, however, recognised that there has been a fundamental shift in working practices since the start of the Covid-19 pandemic with an increased propensity to work from home/remotely. It is expected that this trend will continue over the longer term which will help reduce commuting levels over the Plan period and in turn reducing congestion, emissions and pollution, improve the work-life balance for employees and employers, support local businesses/services and enable the creation of sustainable vibrant communities and '20 minute neighbourhoods<sup>14</sup>'. Appropriately located growth will increase the customer base and workforce, supporting local facilities, businesses and services. The increased reliance on access to local facilities and services during the current pandemic has highlighted their importance to our communities. This option would best meet the needs of and support both the urban and rural communities of Monmouthshire.

Overall, Spatial Option 2 is considered to be the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

**Table 9 - Overview and Summary of Analysis of Spatial Option 3**

#### **Option 3: Focus on M4 Corridor**

Growth would be predominantly located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure

<sup>14</sup> 20 Minute Neighbourhoods are strong, well connected neighbourhoods where people live within a 20 minute walking distance of key everyday services.

connections, including via the South Wales Main rail line at Severn Tunnel Junction. Affordable Housing would be directed to those sustainable areas in the South of the County identified in the LHMA as having the greatest housing need.

#### **Consultation Feedback**

The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Spatial Option, the following comments were made where they disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Spatial Option.

It was considered that this option would offer better prospect for housing to be located closer to employment opportunities with good local transport links, and as a consequence would enable affordable housing in areas with closer proximity to main work sources. Similarly, a number of respondents considered that this option would focus growth on the M4 corridor where there is better access and infrastructure capacity. It was also noted that there is better prospect of major infrastructure investment in the south of the County due to the recommendations made in the Burns Commission Transport Report.

It was also suggested that this option would reduce commuting/travel to work and as a consequence minimise CO<sub>2</sub> emissions and environmental impact, there was also the suggestion that growth in the south of the County would meet the needs of those working in Cardiff, Newport and Bristol.

It was noted that this option would direct growth away from the approach to the Brecon Beacons National Park and would preserve the character of the County towns.

#### **Relationship with RLDP Objectives**

Option 3 does not perform particularly well against the RLDP objectives. A focus on the M4 corridor would, however, provide an opportunity for building more sustainable communities and achieving infrastructure improvements and provision in the south of the County. It would also provide the opportunity to enable investment in public transport and possibly promote a modal shift from the car to more sustainable means of travel in the south of the County. This option would provide the potential to link housing and employment growth due to opportunities for a choice and range of employment land with good links to the M4 corridor. On the contrary, due to the lack of employment opportunities outside the Severnside area this option would exacerbate out-commuting in other areas and would not assist in improving self-containment of settlements outside this area.

A particular concern would be that it would not address market and affordable housing need across all housing market areas as growth would be focused in the Severnside housing market area only. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments, this option would not address the County's affordability issues or build sustainable and resilient communities throughout Monmouthshire.

The impact on demography is also of concern as growth would be focussed on the Severnside area only, with no growth proposed in Primary, Secondary or Rural

Settlements outside of this area. Consequently, the younger population would be priced out of these areas due to the lack of housing supply. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not support/enable social sustainability and balanced communities across the County. Furthermore, this option would impact on the sustainability of existing rural areas as there would be no additional support to help maintain rural facilities nor would there be any rural developments to attract additional rural employment opportunities. This option could also lead to rural isolation.

There are also concerns about the wider impact on sustaining communities in the rest of the County as there would be no additional support to help maintain facilities, the increased reliance on access to local facilities and services during the current pandemic, has highlighted their importance to communities. There would also not be any developments to attract additional employment opportunities. The role and function of the high street in the local community has also been highlighted of particular importance in the current pandemic, this option would not provide sufficient support to existing retail facilities across the County.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

The findings in the ISA note that Option 3 capitalises upon opportunities associated with the Cardiff Capital City Region Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. However, limited growth to the rest of the County would restrict economic growth in the wider County, and would not assist in sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out- commuting. Rural areas in particular will be disadvantaged as they would not benefit from additional housing to help support existing facilities or attract additional facilities. Housing will be delivered to the South of the County only, resulting in needs not being met across all market areas which could in turn have potential impact on house prices arising in this context, given the delivery of affordable homes will only be focussed in the South, and not meet needs more widely. This option, along with Option 4, performs least well in terms of equalities, diversity and social inclusion due to the likely isolation of communities and continuation of imbalanced demographic profile across Monmouthshire as a whole.

The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment theme, noting that all options have the potential to result in negative effects. However, it is recognised the mitigation could be provided and development has the potential to deliver positive effects secured at the project scale. Given the precise location of growth is unknown at this stage all options were found to have an uncertain effect on landscape and climate change themes. This option was, however, ranked the highest for both themes given that it concentrates growth along the M4 corridor in a predominately urban area, located away from nationally designated landscapes to the east and north west of the County, and, is in an area that is not identified in the Flood Risk Management Plan as being significantly constrained in terms of fluvial flood risk. All options have the potential to result in negative effects for natural resources albeit it is recognised that mitigation could be provided and the nature and significance of effects will be dependent on the scale and location of development. The ISA found that

Option 3 has an uncertain effect on the biodiversity theme. While Option 3 would focus of growth in the South of the County outside of the catchment areas of the River Wye and Usk it has potential to lead to negative effects on the Severn Estuary SAC.

**Summary of Analysis**

Whilst the focus of growth on the M4 corridor would provide an opportunity for building sustainable communities and potential infrastructure improvements in the South of the County, it would not address market and affordable housing, social or economic needs across all areas of the County, as growth would be focused in the Severnside area. This option would have a wider negative impact on sustaining communities in other areas of the County due to the lack of growth and associated opportunities in these areas. Following a review of the responses received to the consultation on the Spatial Options and in view of the assessment above, it is not considered prudent to take this Spatial Option forward.

**Table 10 - Overview and Summary of Analysis of Spatial Option 4**

**Option 4: Focus Growth in the North of the County**

Growth would be predominantly located in the most sustainable settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Affordable Housing would be directed to those sustainable areas in the North of the County identified in the LHMA as having the greatest housing need.

**Consultation Feedback**

The consultation question referred to the Councils preferred option and asked whether on the basis of evidence provided the respondent agreed with the Preferred Spatial Option, the following comments were made where they disagreed and a preference was made for a different option. As a consequence, there are no negative responses to this Spatial Option.

It was noted that the most sustainable settlements are located in the north of the County and that as a consequence growth should be predominately focussed in this area and supplemented by growth in other sustainable settlements. Further to this it was considered that development in the north of the County would assist in providing employment opportunities and access to market and affordable homes for a wide population. There was further emphasis on this option enabling more affordable homes in the north of the County as this is the area that has the greatest need.

It was also considered that there is infrastructure capacity in the north of the County to sustain development in this area. Furthermore, it was recognised that this option utilises road connections with good links to both South and West Wales via the A465, England via the A40, and, would also take pressure off the M4/M48 corridor. It was suggested it could also reduce out-commuting from the County which occurs predominately in the south of the County.

It was noted that this option would protect green space and the rural landscape in the south of the County and avoid further urbanisation of the M4 corridor. It would also lessen the impact of traffic congestion and air quality in Chepstow.

#### **Relationship with RLDP Objectives**

Option 4 does not perform particularly well against the RLDP objectives. A focus on the higher tier settlements in the north would, however, provide an opportunity for building more sustainable communities and achieving infrastructure improvements/provision in the North of the County. It would also provide an opportunity to enable investment in public transport and possibly promote a modal shift from cars to more sustainable means of travel in Abergavenny, although it is recognised that this would be more challenging in Monmouth as it doesn't have a railway station. This option would provide the potential to link housing and employment growth due to opportunities for a choice and range of employment land with good links via the Heads of the Valleys and the A449 and A40 to the wider Cardiff Capital Region and Herefordshire/the Midlands. Conversely, due to the lack of employment opportunities outside the North of the County this option would exacerbate out-commuting in other areas and would not assist in improving self-containment of the main settlements outside this area.

A particular concern would be that it would not address market and affordable housing need across all housing market areas as growth would be focused in the northern housing market area only. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments, this option would not address the County's affordability issues or build sustainable and resilient communities throughout Monmouthshire.

The impact on demography is also of concern as growth would be focussed on the higher tier settlements in the North of the County only, with no or little growth proposed in Rural Settlements or in the other Primary, Secondary and Severnside Settlements. Consequently the younger population would be priced out of other areas across the County due to the lack of housing supply. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not support/enable social sustainability and balanced communities across the County.

There are also concerns about the wider negative impact on sustaining rural communities, the increased reliance on access to local facilities and services during the current pandemic, has highlighted their importance to communities. This option would result in no additional support to help maintain rural facilities, nor would there be a quantum of rural developments sufficient to attract additional rural employment opportunities. This option could therefore lead to increased levels of rural isolation.

#### **Integrated Sustainability Appraisal (ISA) Analysis**

The findings in the ISA note that Option 4 through its focus of growth in the most sustainable Settlements in the North of the County capitalises upon opportunities associated with the Cardiff Capital City Region Deal, notably the wider region via the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, limited growth to the rest of the County would restrict economic growth in the wider County, and would not assist in

sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out-commuting. Rural areas in particular will be disadvantaged as they would not benefit from additional housing to help support existing facilities or attract additional facilities. Housing will be delivered to the north of the County only, resulting in needs not being met across all market areas which could in turn have potential impact on house prices arising in this context, given the delivery of affordable homes will only be focussed in the north, and not meet needs more widely. This option along with Option 3 performs least well in terms of equalities, diversity and social inclusion due to the likely isolation of communities and continuation of imbalanced demographic profile across Monmouthshire as a whole.

The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment theme, noting that all options have the potential to result in negative effects, however it is recognised the mitigation could be provided and development has the potential to deliver positive effects secured at the project scale. Given the precise location of growth is unknown at this stage all options were found to have an uncertain effect on landscape and climate change themes. All options have the potential to result in negative effects for natural resources albeit it is recognised that mitigation could be provided and the nature and significance of effects will be dependent on the scale and location of development. The ISA found that similar conclusions could be drawn in relation to biodiversity given the presence of international, national and local designations throughout the County. It was noted that the options can however be differentiated in relation to nutrient neutrality implications on the River Wye and River Usk SACs. The RLDP HRA (2021) concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications because they are served by Waste Water Treatment Works discharging into the upper reaches of both SACs. Option 4, directs the most growth to these Primary Settlements and is therefore the worst performing overall in terms of the biodiversity ISA theme.

#### **Summary of Analysis**

Whilst the focus of growth in the north of the County would provide an opportunity for building sustainable communities and potential infrastructure improvements in the north of the County, it would not address market and affordable housing, social or economic needs across all areas of the County as growth would be focused in the north of the County. This option would also have a negative impact on sustaining rural communities, due to the lack of growth and associated opportunities in these areas.

Following a review of the responses received to the consultation on the Spatial Options and in view of the assessment above, it is not considered prudent to take this Spatial Option forward.

## 4 Conclusion

### 4.1 Preferred Growth Option

- 4.1.1 The Growth Options presented provide alternative growth strategy options to inform the level of dwelling and employment provision within the RLDP, having regard to national policy, the evidence base and policy aspirations. Based on the assessment set out above, Growth Option 5 Population-led projection (with added policy assumptions) is the Council's preferred Growth Option.
- 4.1.2 Growth Option 5 would provide the level of growth that will help to deliver the Council's core purpose of building sustainable and resilient communities for current and future generations. Fundamentally, this option will enable the provision of a sufficient range and choice of homes, both market and affordable, the need for which has been heightened by the current pandemic. This option will also assist in ensuring our communities are balanced and socially sustainable, particularly in terms of demography, which is a key RLDP objective and the importance of which has been clearly demonstrated during the current pandemic.
- 4.1.3 Likewise, the level of employment growth will assist in reducing the need to travel / levels of out-commuting, and promoting self-contained communities. Whilst this option projects a significant growth in jobs, with an increase of 7,215 jobs over the Plan period, there has been a fundamental shift in working practices since the start of the Covid-19 pandemic with an increased propensity to work from home/remotely. It is expected that this trend will continue over the longer term and in accordance with Welsh Government's ambition of 30% of the Welsh workforce working from or near home is something that we wish to encourage and enable. This provides residents with the opportunity to both live and work in the County in this new way, providing a flexible approach to achieving the level of job growth under this option, whilst also achieving the Welsh Government and Council's aim of reducing the need for commuting. This in turn will reduce congestion, emissions and pollution, improve the work-life balance for employees and employers, support local businesses/services and enable the creation of sustainable vibrant communities and '20 minute neighbourhoods'. While it will not be possible for all employment sectors to work from home /work remotely, policy support requiring broadband connectivity and supporting the provision of local employment hubs will enable those who can and choose to do so. The Covid-19 pandemic has affected home-buying trends with an emphasis on quality of life, house size and access to outdoor green space rather than a focus on commuting times. Monmouthshire is a very attractive proposition and stands to gain from an increased economically active population without the associated problems of increased commuting, and local businesses and services would benefit from increased custom and footfall with workers spending their wages in local businesses rather than in the town/city in which they previously worked.
- 4.1.4 Appropriately located growth will increase the customer base and workforce, supporting local facilities, businesses and services. The increased reliance on access to

local facilities and services during the current pandemic, has highlighted their importance to our communities. This option would best meet the needs of and support the communities of Monmouthshire by providing a level of growth which will provide opportunities to secure affordable housing, improvements to infrastructure and potential to maximise opportunities to secure and/or enhance green infrastructure, public open space and recreation provision.

4.1.5 With regard to the ISA analysis, Growth Option 5 performs better overall against the ISA themes than any of the other five options. In particular Growth Option 5 along with Growth Option 6 are predicted to perform well against ISA themes relating to population/ communities and economy/ employment. Both Options are considered likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Both Options provide opportunities to encourage a more diverse and vibrant economy. Through the delivery of new homes, jobs and community infrastructure that strategically improve accessibility and connectivity within the County Options 5 and 6 are considered to have the greatest potential to support diverse and inclusive communities. However the ISA considers that Option 5, by more closely aligning with past delivery rates presents a more realistic option. As a result, significant positive effects are considered likely under Option 5 against these ISA themes.

4.1.6 Overall, Growth Option 5, Population-led projection (with added policy assumptions) best meets the RLDP objectives without adverse impacts on the climate emergency objective and is considered to be the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

## **4.2 Preferred Spatial Option**

4.2.1 The Spatial Options presented provide alternative spatial strategy options for accommodating growth, having regard to the evidence base and policy aspirations. Based on the assessment set out above, Spatial Option 2 to Distribute Growth Proportionately across the County's most Sustainable Settlement is the Council's preferred Spatial Option. Spatial Option 2 is considered to be the most conducive option for achieving the Council's core objective of building sustainable and resilient communities across Monmouthshire and was the most supported option in response to the consultation as well as performing well in relation to the RLDP objectives and Initial Integrated Sustainability Appraisal. It is considered that Spatial Option 2 is the Council's preferred Spatial Option for accommodating growth, having regard to the evidence base and policy aspirations.

4.2.2 This option would provide proportionate growth in the most sustainable urban and rural areas, in accordance with the Sustainable Settlement Appraisal. It is considered that this spatial option provides a land use framework that will help deliver the Council's core purpose of helping to build sustainable and resilient communities for current and future generations. Fundamentally, this option will enable the provision of a sufficient range and choice of homes, both market and affordable to be provided

throughout the County's most sustainable settlements, the need for which has been heightened by the current pandemic. This option will also assist in ensuring our communities are balanced and socially sustainable, particularly in terms of demography, which is a key RLDP objective and the importance of which has been clearly demonstrated during the current pandemic. Likewise, it addresses employment growth and resilience by directing growth to sustainable locations across the County, which will assist in reducing the need to travel/levels of out-commuting and promoting self-contained communities. It is, however, recognised that there has been a fundamental shift in working practices since the start of the Covid-19 pandemic with an increased propensity to work from home/remotely. It is expected that this trend will continue over the longer term which will help reduce commuting levels over the Plan period and in turn reduce congestion, emissions and pollution, improve the work-life balance for employees and employers, support local businesses/services and enable the creation of sustainable vibrant communities and '20 minute neighbourhoods'. Appropriately located growth will increase the customer base and workforce, supporting local facilities, businesses and services. The increased reliance on access to local facilities and services during the current pandemic has highlighted their importance to our communities. This option would best meet the needs of and support both the urban and rural communities of Monmouthshire.

- 4.2.3 In addition to this, the ISA analysis ranks Spatial Option 2, along with Spatial Option 1, as performing the best overall. The findings in the ISA note that while there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes. Accordingly, Spatial Option 2 performs positively overall, and is found to have the potential for significant long term positive effects against the ISA themes relating to economy/employment, population/communities, health/wellbeing, and equalities compared to the other options. The ISA notes that this option will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. This option would perform positively in terms of providing housing to meet the identified needs of the County and would provide affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population.
- 4.2.4 Overall, this option is considered to be the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.