

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan

Initial ISA Report

Monmouthshire County Council

2021

Quality information

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Introduction

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Monmouthshire County Council's Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG).

ISA Explained

- 1.2 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.
- 1.3 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WBFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.

Sustainability Appraisal (SA)

- 1.4 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹. It also widens the scope of the assessment from focusing largely on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Development Plans under Section 19(5) of the Planning and Compulsory Purchase Act 2004.
- 1.5 In line with the requirements of the SEA Directive, the two key steps in SA are that:
1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.6 The LDP Manual Edition 3 (2020) states that SA, incorporating SEA, plays an important part in demonstrating that the LDP is sound by ensuring that it reflects the legislative requirements and achieves sustainable development.

¹ Directive 2001/42/EC

Equalities Impact Assessment (EqIA)

- 1.7 As a public-sector organisation, Monmouthshire Council has a duty under the Equality Act 2010² and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the RLDP avoid unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with protected characteristics³ and all others.
- 1.8 In March 2021 the Socio-economic Duty commenced, which compliments the Equalities Act and PSED by further contributing towards Wales' long term well-being goals, in particular "A more equal Wales" and "A Wales of cohesive communities". Further strengthening social partnership arrangements and advancing fair work ambitions.⁴
- 1.9 An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

Health Impact Assessment (HIA)

- 1.10 The Public Health (Wales) Act 2017 contains a provision to require a Health Impact Assessment (HIA) to be carried out to assess the likely effect of the proposed development plan on health and mental well-being and inequality. The HIA process provides a systematic yet flexible and practical framework that can be used to consider the wider effects of LDP policies and how they, in turn, may affect people's health.

Welsh Language Impact Assessment (WLIA)

- 1.11 The Welsh Government is committed to supporting the Welsh Language so that it can thrive and grow across Wales. The Welsh Language must be considered from the outset of the development plan process. It is a legislative requirement that the SA must include an assessment of the likely effects of the plan on the use of the Welsh language (The Planning (Wales) Act 2015 (Section 11)).
- 1.12 Planning Policy Wales (PPW) (2021) sets the policy requirements for Welsh language. Technical Advice Note 20: Planning and the Welsh Language provides guidance on the consideration of Welsh language as part of the development plan process. The TAN provides advice on incorporating the Welsh language in development plans through the SA and the policy approach to anticipated windfall development. In summary, planning authorities must consider the likely effects of their development plans as part of the SA process and include a statement within the Deposit Plan on how this has been considered and or addressed within the development plan. The ISA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

Well-being of Future Generations (Wales) Act 2015

- 1.13 The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the Well-being of Future Generations (Wales) Act 2015 (WBFGA).

"Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals".

² Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>

³ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

⁴ Welsh Government (2020) A more equal Wales: strengthening social partnership white paper [online] available at: <https://gov.wales/more-equal-wales-strengthening-social-partnership-white-paper>

1.14 The WBFGA sets seven well-being goals which all public bodies are required to achieve:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

1.15 The Act also identifies five ways of working which public bodies need to demonstrate they have carried out when undertaking their duty to achieve sustainable development. These are: involvement, collaboration, integration, prevention and long term factors. The well-being goals and the five ways of working can be used to inform and structure the ISA framework.

This Initial ISA Report

1.16 This Initial ISA Report⁵ is published alongside the Preferred Strategy. Any representations received will be taken into account and a revised ISA Report will be published subsequently alongside the Deposit Plan.

⁵ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the Preferred Strategy seeking to achieve?

- 2.1 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of the Council's purpose of helping to build sustainable and resilient communities that support the wellbeing of current and future generations. The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP will build upon the current LDP which covers the period 2011-2021.

Issues, challenges and opportunities

- 2.2 The issues, challenges and opportunities informed the development of the RLDP Vision and Objectives. A total of 38 issues, challenges and opportunities were identified and grouped to align with the seven Well-being Goals as set out in the Well-being of Future Generations (Wales) Act 2015 to ensure that they are framed within this context. A summary of the key issues and challenges as set out by the Council are presented below:
- There is a need to tackle climate change and carbon reduction. The Council recognises that we are in a climate emergency and has committed to strive to limit the increase in global temperatures to 1.5°C. The RLDP will provide the policy framework to support and enable renewable energy generation and establish requirements for low carbon developments and other sustainable development principles such as active travel and green infrastructure.
 - Our population is getting older. By 2033 we will have more old people living in the County but fewer young people. The importance of addressing this issue has increased during the pandemic with renewed emphasis on ensuring communities are balanced, particularly in terms of demography.
 - An older population changes the kind of services our communities will need, but also reduces the number of people using and financially supporting businesses and services. We will have a smaller economically active population making Monmouthshire a less attractive place for businesses to locate. This impacts on our future economic prospects.
 - We have the highest average house prices in Wales. This means a large proportion of people cannot afford to buy a home so either leave the County, or, have to live with their parents or in shared housing for longer. High house prices and associated affordability could be exacerbated by the impacts of Covid-19, potentially as a result of increased unemployment but also due to the continuation of home/agile working and increased importance on quality of life/environment. This could influence decisions on where to live making Monmouthshire an even more attractive proposition increasing house prices further.
 - We have over 2,000 households identified as being in need of affordable housing. The RLDP will explore opportunities to ensure a range and choice of homes are incorporated within new developments and identify affordable housing-led sites.
 - There is a need to consider whether existing employment land is suitably located and fit for purpose for appropriate growth sectors, along with the potential increase in agile and home working and the impact this may have on employment land demand/requirements. We also need to consider future demand in line with Council aspirations and the opportunities that a shift in working behaviour could create with businesses given greater flexibility over where to locate..
 - There are opportunities associated with the removal of Severn Bridge tolls and growth from both the Cardiff Capital region and Bristol region.

- Unemployment levels are low; however, these have increased during Covid-19 consistent with the national picture. Monmouthshire also has a net-outflow of commuters. To address these issues there is a need to provide support for inward investment and local employment growth/opportunities.
- Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled.
- Vacancy rates in some of the County's retail centres have increased which is likely due to the changing role of high streets in addition to Business Rates and further influenced by Covid-19 restrictions and the increase in online shopping.
- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. Lockdown has emphasised the value and importance of having locally accessible services and facilities.
- We want to protect the landscapes and heritage that make Monmouthshire a unique and attractive place to live. This key aim has been reinforced during Covid-19 with lockdowns emphasising the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and recreation.
- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. This importance may be enhanced further by the increased demand for 'staycations', with particular emphasis on self-catering accommodation in the short-term.

2.3 The key opportunities to realising some of the issues/ challenges are set out below.

Cardiff Capital Region City Deal

2.4 The overarching economic objectives of the City Deal are to create 25,000 new jobs and leverage £4 billion in private sector investment across the region. Key themes have been identified to focus the approach: Connecting the Region; Regeneration and Infrastructure; Skills and Employment. These strategic themes have implications for the RLDP including:

- Connecting the Region - Digital Strategy: this aims to create a smart region, driving innovation and solutions to attract private sector partnership and investment, including Welsh and regional connectivity, mobile 5G access and maximising open data.
- Metro - the South East Wales Metro project provides much needed opportunities to increase train service frequency, improve inter-modal connectivity and coordination, streamline ticketing and improve bus services.
- Regeneration and Infrastructure - the Housing and Investment Fund has been proposed to support the need for more homes to be built across the region. This will include assistance in stimulating the SME sector across the region by providing loan development finance and launching a Customer Build Scheme releasing smaller plots of public sector land with a full package of support for SMEs to deliver new homes.
- Skills and Employment - the Skills for the Future project provides region-wide school engagement with pupils and parents to offer careers advice and guidance, support for businesses to address barriers of participation, including a skills investment fund and a commitment to support delivery of over 10,000 additional apprenticeships, graduate internships and upskilled employees in the private sector.

Monmouthshire 2040: Our Economic Growth and Ambition Statement

2.5 The Council's Economic Growth and Ambition Statement and Prospectus set out the aspirations to raise the profile of Monmouthshire as a dynamic place to do business, a credible place to invest and an incredible place to live, visit and stay. It recognises that Monmouthshire's economy needs to grow to help build sustainable and resilient communities

that support the well-being of current and future generations and sets out the priorities and aims to achieve this vision.

2.6 The Economic Growth and Ambition Statement and accompanying Prospectus will work alongside RLDP and will assist in:

- Raising the profile of Monmouthshire as a key investment opportunity for the private sector;
- Attract funding and investment to Monmouthshire to attract and facilitate economic growth to the County
- Increasing the take up of apprenticeships and reducing the number of residents who are not in education, employment or training.
- Increasing next generation access broadband and mobile phone coverage across the County.

Vision

2.7 The vision clarifies the core purpose of the RLDP and provides a framework for developing the Preferred Strategy and future detailed policies. The vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County and reflects key elements of the PSB Well-being Plan and Corporate Business Plan. The Vision has been reviewed in light of the Covid-19 pandemic and is considered to remain relevant and appropriate.

By 2033 Monmouthshire will be a place where:

- 1) People are living in sustainable, resilient communities that support the well-being of current and future generations and are more inclusive, cohesive, prosperous, vibrant and balanced demographically. Both urban and rural communities are well-connected with better access to local services and facilities, open space and employment opportunities.***
- 2) Communities and businesses are part of an economically thriving and well-connected County.***
- 3) The best of the County's built heritage, countryside, landscape and environmental assets have been protected and enhanced to retain its distinctive character.***
- 4) People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment.***

The spatial implications of achieving this Vision will be that by 2033:

Monmouthshire will have grown sustainably, with a proportionate distribution of new homes and jobs across the most sustainable settlements, which are supported by amenities and infrastructure with the delivery of affordable housing to meet local needs.

Development will have contributed to facilitating sustainable lifestyles by delivering high quality places that promote low carbon developments with an appropriate mix of uses and that are well-connected both digitally and physically to the wider area in terms of character, environment and movement by public transport, walking and cycling.

Objectives

2.8 In order to address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP, which build upon the Adopted LDP objectives and the well-being objectives set out in the Monmouthshire Well-being Plan. The objectives were subsequently reviewed and revised following the climate emergency declaration in May 2019. They were

also reviewed in light of the Covid-19 pandemic and endorsed by Cabinet on 17th June 2020 and by Council (October 2020) as remaining relevant.

- 2.9 As with the RLDP issues, the objectives set out in **Table 2.1** below have been grouped in alignment with the seven well-being goals as set out in the Well-being of Future Generations (Wales) Act 2015, and are aligned with the RLDP issues, the main policy themes identified in Planning Policy Wales (PPW11) and the Monmouthshire Well-being Plan objectives.

Table 2.1: RLDP objectives

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ⁶	Main PPW11 theme	PSB Well-being plan objective
A Prosperous Wales (Well-being Goal 1)					
Objective 1	Economic Growth/ Employment*	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow on spaces.	1, 2, 3, 4, 5, 6, 7, 24	Productive and enterprising places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 2	Retail centres*	To sustain and enhance the County towns of Abergavenny, Chepstow, Monmouth, Caldicot and Usk as vibrant and attractive retail centres serving their own populations and those of their surrounding hinterlands, along with increasing the potential customer base through future growth whilst recognising that the role of these centres is evolving.	8	Active and social places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
A Resilient Wales (Well-being Goal 2)					
Objective 3	Green Infrastructure, Biodiversity and Landscape*	To protect, enhance and manage Monmouthshire's natural environment and ecosystems. This includes, the Wye Valley Area of Outstanding Natural Beauty, the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests, along with the connectivity between them by creating new linkages for them to adapt while at the same time maximising benefits for the economy, tourism, health and well-being.	11, 12, 35	Distinctive and natural places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Objective 4	Flood risk	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development to appropriately manage surface water run-off.	12, 13	Distinctive and natural places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Objective 5	Minerals and Waste	To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.	14, 15	Productive and enterprising places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

⁶ See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ⁶	Main PPW11 theme	PSB Well-being plan objective
Objective 6	Land	To promote the efficient use of land, including the need to: <ul style="list-style-type: none"> • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. 	16, 17	Strategic and spatial choices	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
Objective 7	Natural resources	To promote the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.	14, 15, 31, 37	Productive and enterprising places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
A Healthier Wales (Well-being Goal 3)					
Objective 8	Health and Well-being*	To improve access for all to recreation, sport, leisure activities, open space and the countryside and to enable healthier lifestyles.	18, 20, 21, 33, 35	Active and social places	Provide children and young people with the best possible start in life.
A More Equal Wales (Well-being Goal 4)					
Objective 9	Demography*	To increase opportunities for the younger population to both live and work within Monmouthshire to assist in ensuring a balanced demography.	2, 3, 4, 5, 24	Active and social places	Respond to the challenges associated with demographic change.
A Wales of Cohesive Communities (Well-being Goal 5)					
Objective 10	Housing*	To provide a level of housing that is sufficient to provide a wide ranging choice of homes both for existing and future residents, while ensuring that local needs for appropriate, affordable and accessible housing are met as far as possible, particularly in towns but also in rural areas, so long as such housing can assist in building sustainable balanced communities.	23, 25, 26, 27, 28	Active and social places	Respond to the challenges associated with demographic change.
Objective 11	Place-making	To promote good quality sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and countryside; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35	Strategic and spatial choices	Respond to the challenges associated with demographic change.

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ⁶	Main PPW11 theme	PSB Well-being plan objective
Objective 12	Communities	To build sustainable resilient communities where people have good access to employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35	Strategic and spatial choices	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 13	Rural Communities	To sustain existing rural communities as far as possible by providing development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	6, 7, 20, 22, 26, 29, 30, 34	Productive and enterprising places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 14	Infrastructure*	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, sewerage, water, transport, schools, health care and broadband etc.) is in place or can be provided to accommodate new development.	12, 19, 20, 31	Productive and enterprising places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
Objective 15	Accessibility	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport.	10, 30, 36	Active and social places	Develop opportunities for communities and business to be part of an economically thriving and well-connected county.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)					
Objective 16	Culture, Heritage and Welsh Language	To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.	9, 32, 33, 34, 35	Distinctive and natural places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
A Globally Responsible Wales (Well-being Goal 7)					
Objective 17	Climate Change*	To strive to limit the increase in global temperatures to 1.5°C, supporting carbon reduction through a variety of measures including the use of renewable energy, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality Green Infrastructure.	10, 12, 36, 37, 38	Distinctive and natural places	Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.

* indicates the Objective has increased emphasis and importance in light of Covid-19

3. What is the scope of the ISA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the ISA, i.e. the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) ISA.

Consultation on the scope

- 3.2 The Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In Wales, the consultation bodies are the natural Resources Wales and Cadw.⁷ A Scoping Report was sent to the statutory consultees for comment from 26th October to 30th November 2018. The responses received were taken into account and amendments made to the baseline information and draft ISA Objectives where necessary. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2018.
- 3.3 Further information on the scope of the ISA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ – is available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.

SA Objectives

- 3.4 **Table 3.1** presents the ISA objectives - grouped under ten theme headings - established through scoping, i.e. in light of context/baseline review, identified key issues and responses from statutory consultees.
- 3.5 Taken together, the ISA themes and objectives presented in **Table 3.1** provide a methodological ‘framework’ for appraisal.

Table 3.1: ISA framework

ISA theme	ISA objective
Economy and Employment	Deliver sustainable economic growth by strengthening the local economy and capitalising on the opportunities associated with the Cardiff Capital Region City Deal, promote tourism and enhance the vitality and viability of town centres.
	Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.
Population and Communities	Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.
	Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.
Health and well-being	To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.
Equalities, diversity and social inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.

⁷ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

ISA theme	ISA objective
Transport and Movement	To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.
Natural Resources (Air, Land, Minerals and Water)	To reduce all forms of air pollution in the interests of improving local air quality.
	To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.
	To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use and recycling.
	To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.
Biodiversity and Geodiversity	To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.
Historic Environment	To conserve and enhance the significance of the County's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings.
Landscape	To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.
Climate Change	To promote and encourage energy generation from renewable sources and energy efficiency.
Flood Risk	Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.

Part 1: What has Plan-making/ ISA involved up to this point?

4. Introduction (to Part 1)

- 4.1 The review of the Local Development Plan has been underway since 2018, with a wide range of evidence produced to inform the development of the RLDP. **Table 4.1** sets out the key RLDP and SA Documents published along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.⁸

Table 4.1: RLDP and SA stages

RLDP Documents & Consultation	ISA Documents & Consultation
	ISA Scoping Report Sent to statutory consultees for consultation from 26 th October to 30 th November 2018.
Issues, Vision and Objectives Paper (January 2019 as amended June 2021)	
Growth and Spatial Options Consultation Paper Public consultation from July to August 2019	
Preferred Strategy Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020)	Initial ISA Report and NTS Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020)
RLDP Review of Issues, Vision, Objectives and Evidence Base in light of Covid-19 (September 2020) This Review was agreed by Council on 22 October 2020 and submitted to the Welsh Government in accordance with Ministerial advice	
Revisited RLDP Growth and Spatial Options Consultation Paper Public consultation from January to February 2021	ISA of Strategic Options Report Public consultation January – February 2021 on the revisited RLDP Growth and Spatial Options

- 4.2 This part of the Initial ISA Report sets out the work undertaken in 2018-21 that led to the development of the Preferred Strategy document that is currently the focus of appraisal (see Part 2, below) and currently published for consultation. Specifically, in-line with regulatory requirements (Schedule 2 of the SEA Regulations), there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the draft plan for publication.
- 4.3 This part of the report presents information regarding the consideration of reasonable alternatives. This information is important given regulatory requirements.⁹

Structure of this part of the report

- 4.4 This part of the report is structured as follows:

- **Chapter 5** - explains the context and work undertaken to develop reasonable alternatives at this stage;
- **Chapter 6** - presents an appraisal of the reasonable alternatives; and

⁸ <https://www.monmouthshire.gov.uk/planning-policy/local-development-plan-revision/>

⁹ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

- **Chapter 7** - explains reasons for selecting the preferred strategy.

5. Establishing the Reasonable Alternatives

Introduction

- 5.1 This chapter explains the evidence and work carried out at this stage to identify strategic options. In order to deliver the vision and objectives identified in Chapter 2, the Council explored how much growth (housing and employment) is required over the plan period (2018-2033) and where this growth could be located in the County. Each of these issues are discussed in turn below.

Level of growth

Initial ISA of growth options (March 2020)

- 5.2 Monmouthshire, Torfaen and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing and employment growth scenarios to inform the Replacement Local Development Plan (RLDP). A total of 20 different demographic-led, housing-led and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 mid and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.
- 5.3 In light of the consultation responses received, informal feedback from Welsh Government officials, which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs, and the Council's further consideration of the options, a decision was taken to commission Edge Analytics to model an additional demographic-led scenario to address two of the key issues/ challenges facing the County in relation to retaining/ attracting younger adult population age groups and improving labour force retention.
- 5.4 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out.

Revised growth options (December 2020)

- 5.5 The Council has since revisited the Growth and Spatial Options stage of the RLDP process due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.
- 5.6 The Welsh Government population and household projections form the starting point for the RLDP evidence on growth levels, onto which policy choices can be added as needed, for example to ensure that the County's identified issues are addressed, objectives met and vision achieved. The 2020 publication of corrected Welsh Government 2018-based population and household projections comprise important new evidence that requires consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.
- 5.7 To take account of the latest evidence, an Updated Demographic Evidence Report (November 2020) was prepared by Edge Analytics, which sets out a range of updated growth options for the RLDP.¹⁰
- 5.8 A total of fourteen different scenarios have been generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA. In addition to the initial modelling, all

¹⁰ <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

six selected options have been the subject of additional testing to establish the impact on demography, dwellings, household formation and employment of an affordable-housing policy-led strategy.

- 5.9 The six growth options identified in the Growth and Spatial Options Paper (December 2020)¹¹ are presented in Table 5.1 overleaf.

¹¹ Monmouthshire County Council (2020) Growth and Spatial Options Paper [online] available at <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/growth-and-spatial-options/>

Table 5.1: December 2020 growth options

Growth Option	Type of Scenario	Population Change 2018-2033	Population Change %	Average Net Migration per annum	Household Change 2018-2033	Household Change %	Dwellings per annum	Dwellings 2018-2033	Jobs per annum	Jobs 2018-2033
1. Balanced Migration (with added policy assumptions) (Net Nil Migration (MR, CR_R), AH)	Demographic	-5,110	-5.4%	108	-240	-0.6%	-17	-255	-120	-1,800
2. WG 2018-based Principal Projection (AH)	Demographic	6,047	6.4%	818	3,749	9.3%	262	3,930	208	3,120
3. WG 2018-based Principal Projection (with added policy assumptions) (WG 2018-based Principal (MR, CR_R), AH)	Demographic	6,147	6.5%	825	4,551	11.3%	318	4,770	265	3,975
4. Dwelling-led Average (based on dwelling completion rates) (Dwelling-led 5 year average, AH)	Dwelling	10,641	11.3%	1,110	5,628	14.0%	402	6,030	364	5,460
5. Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R), AH)	Demographic	12,443	13.2%	1,223	7,255	18.1%	507	7,605	481	7,215
6. Employment-led projection (with added policy assumptions) (Radical Structural Change Higher (CR_R), AH))	Employment	17,403	18.5%	1,524	8,653	21.6%	604	9,060	642	9,630

Location of growth

Initial ISA of spatial options (March 2020)

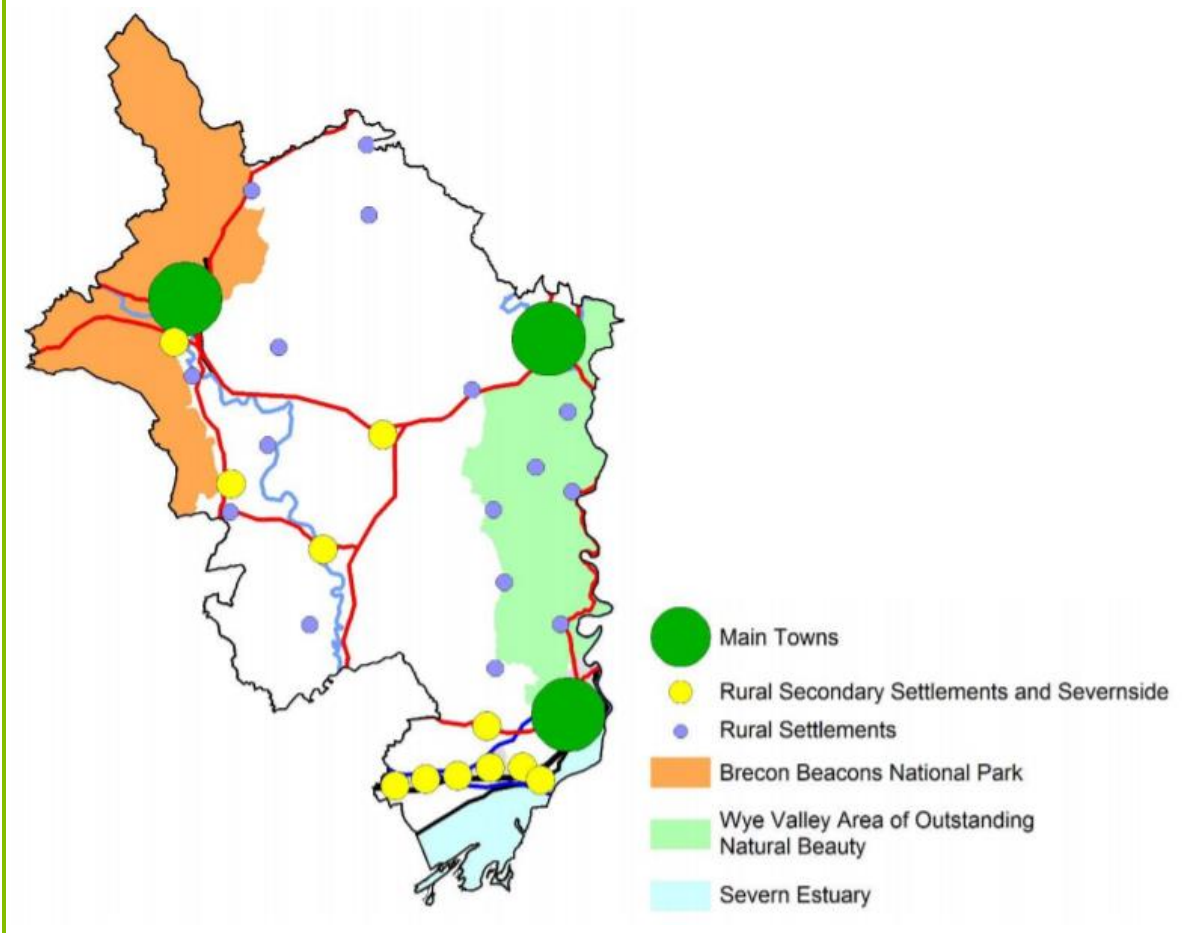
- 5.10 A total of eight Spatial Options were initially considered and included in the long list of spatial options (set out in Appendix 4 of the Growth and Spatial Options Consultation Paper, July 2019) but three were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, five spatial options were consulted on as part of the Growth and Spatial Options Consultation. Subsequent to this, as with the growth options, two additional spatial options were identified in light of consultation responses and emerging national policy at the time. These seven options were considered through the ISA process in early 2020.

Revised spatial options (December 2020)

- 5.11 As highlighted above, the Council is revisiting the Growth and Spatial Options stage of the RLDP process following the publication of the corrected Welsh Government 2018-based population and household projections in August 2020. The RLDP spatial options previously considered have been reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2019 consultation included a new settlement. These have since been discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11) which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, which focuses growth in the North of the County, has been included as a result of consultation responses on the 2019 Growth and Spatial Options.
- 5.12 Accordingly, a total of four broad Spatial Distribution Options remain relevant and have been taken forward as realistic options. These are set out overleaf.

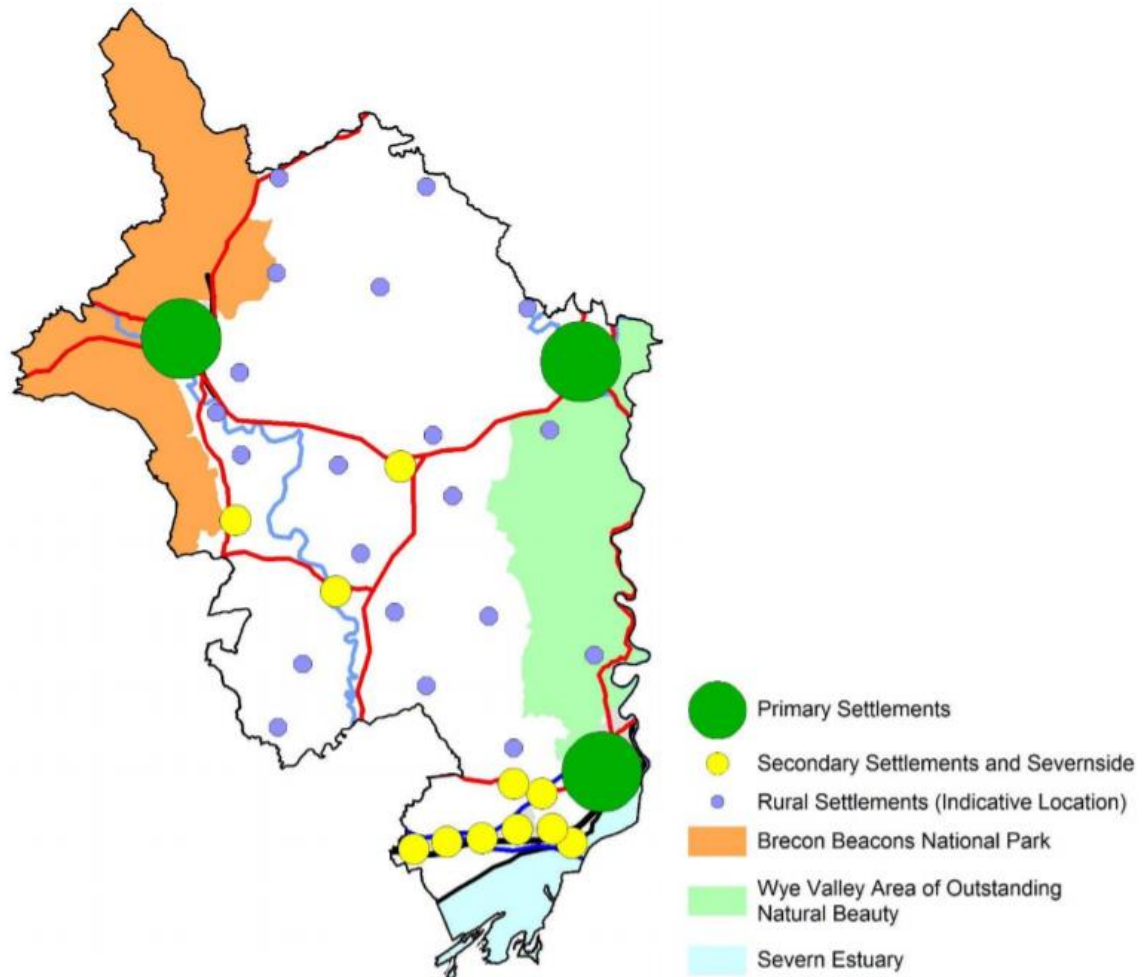
Option 1: Continuation of the existing LDP Strategy - Growth would be distributed around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development would be accompanied by new employment opportunities, where possible.

Figure 5.1: Option 1



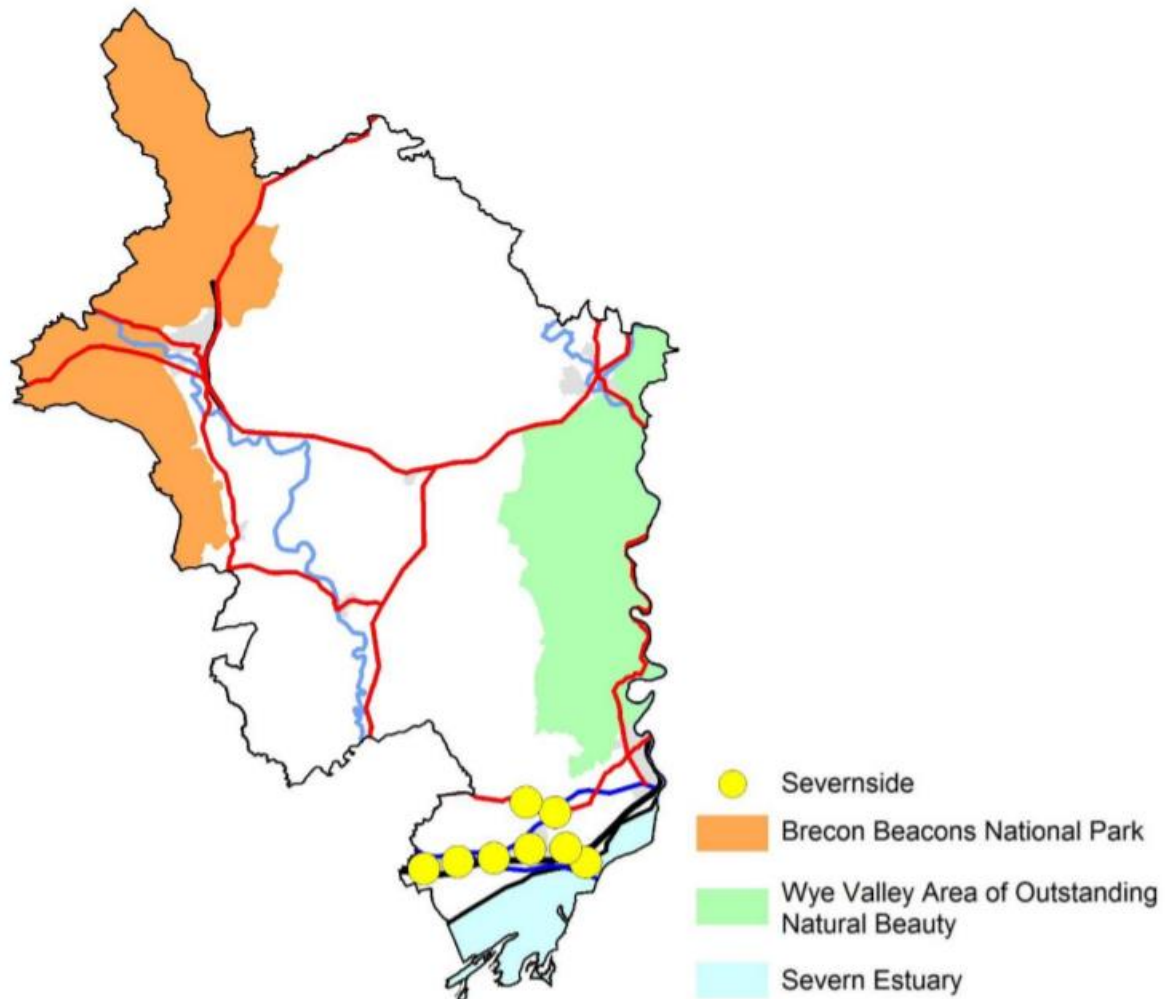
Option 2: Distribute Growth Proportionately across the County's most Sustainable Settlements - Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, with the level of growth proportionate to that settlement's size and amenities, affordable housing need as identified in the LHMA, the capacity for growth and/or the need for development to sustain the community.

Figure 5.2: Option 2



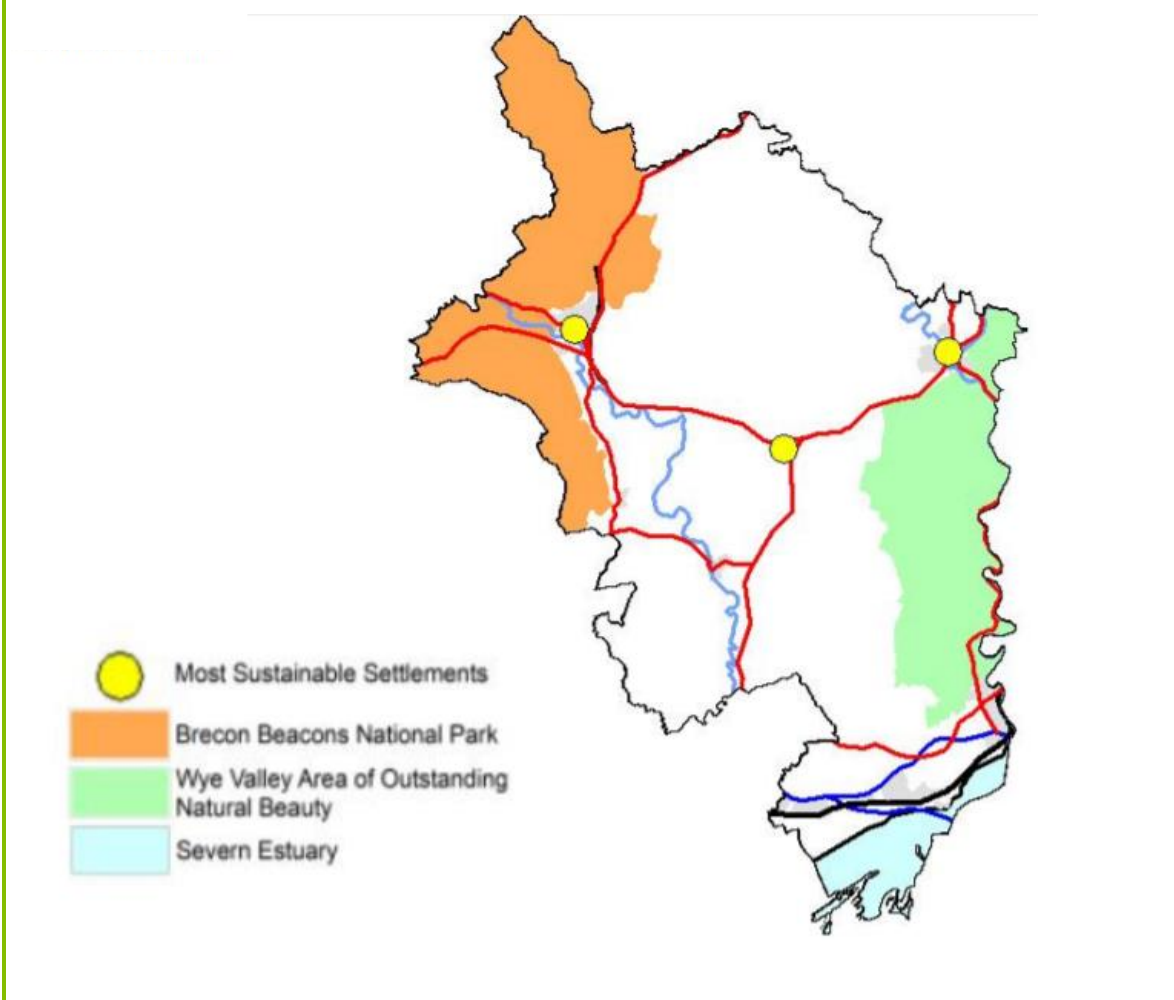
Option 3: Focus Growth on the M4 corridor - Growth would be predominately located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure 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.

Figure 5.3: Option 3



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.

Figure 5.4: Option 4



Strategic growth areas

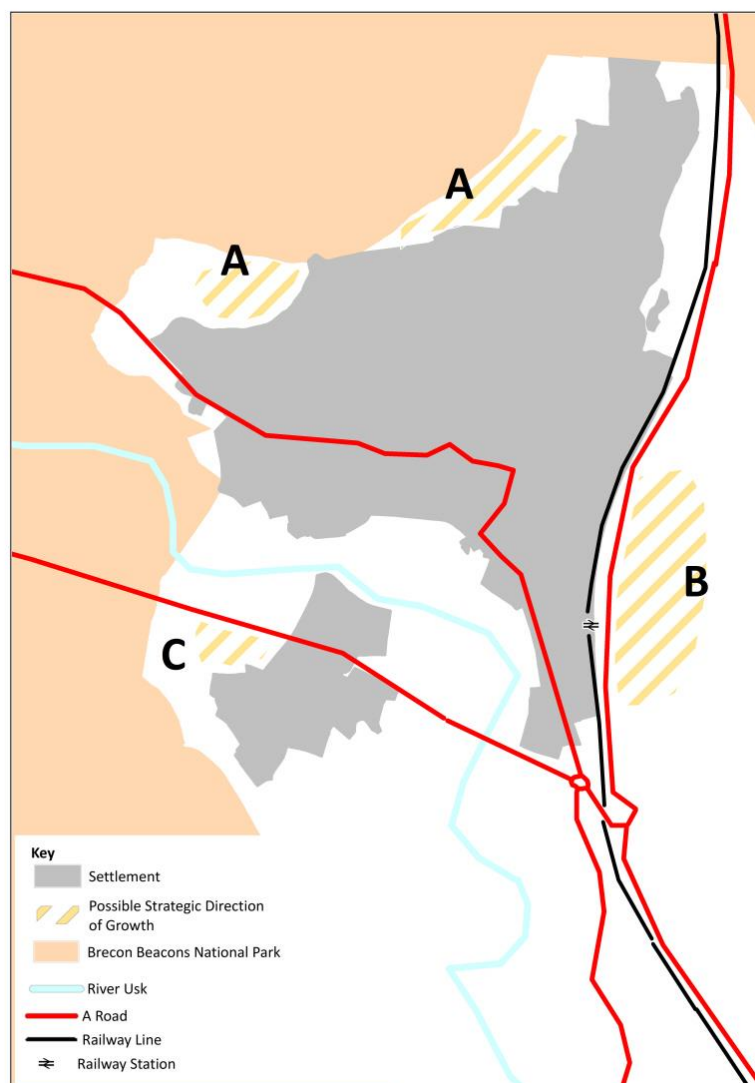
- 5.13 The Council has identified a number of potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a high level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. At the present time only strategic sites and sustainable urban extensions of around 8ha in size and above have been considered.
- 5.14 The identified strategic growth areas are considered by the Council in theory to have the potential to underpin the Spatial Strategy, by accommodating growth and focusing development within those settlements and areas which are identified as the most sustainable locations. It is important to note that at this stage no decision has been made by the Council in terms of preferred strategic growth areas or sites and that not all sites will be selected for inclusion in the Deposit Plan, as their combined capacity exceeds the number of dwellings needed to meet the residual housing provision. A second Call for Candidate Sites will be undertaken alongside the publication of the Preferred Strategy and further site options which are compatible with the Preferred Strategy could be submitted at this time. The final selection of sites for the Deposit Plan will be dependent on further detailed assessment work, including:
- The ability to deliver the level of supporting infrastructure required;
 - A masterplanning process to ensure they create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
 - A financial viability assessment to ensure sites are deliverable within the Plan period.
- 5.15 The potential strategic growth options are identified below.

Abergavenny and Llanfoist

5.16 Three possible strategic growth areas/ options for Abergavenny and Llanfoist have been identified at this stage and are set out below and illustrated in **Figure 5.5**:

- A. Land north of Abergavenny;
- B. Land to the east of the A465; and
- C. Land between the B4246 and Heads of the Valleys Road.

Figure 5.5: Abergavenny strategic growth options

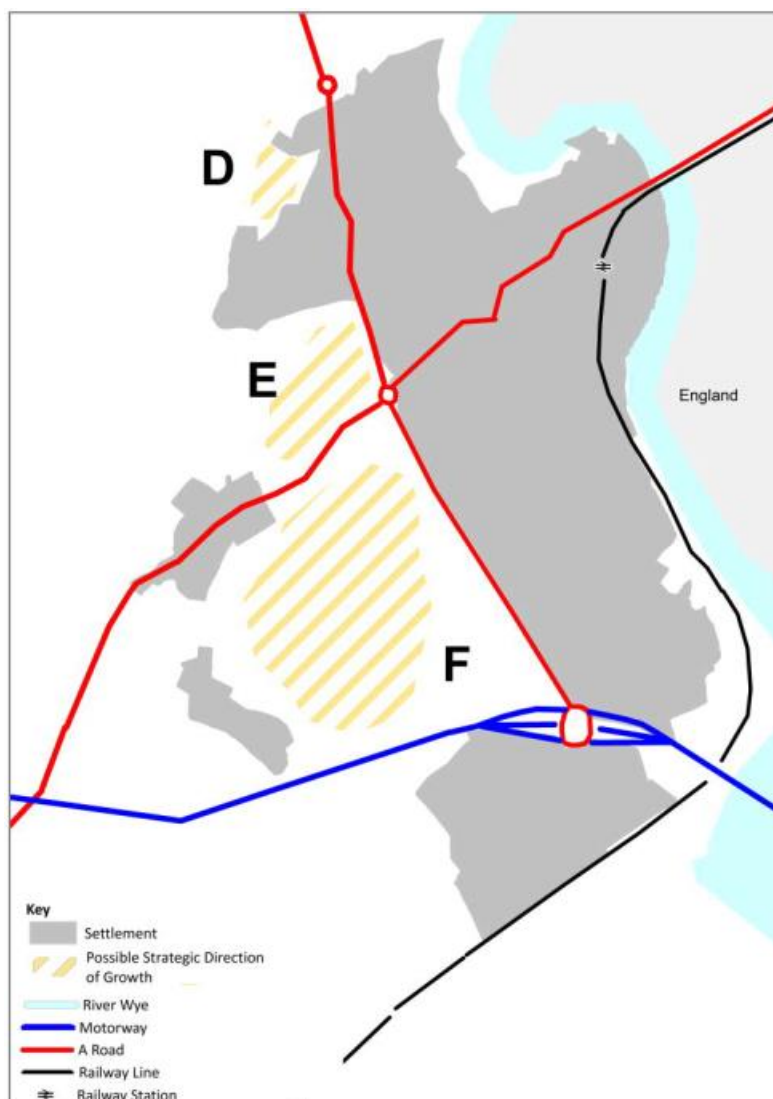


Chepstow

5.17 Three possible strategic growth areas/ options for Chepstow have been identified at this stage and are set out below and illustrated in **Figure 5.6**:

- D. Land north of the Bayfield Estate;
- E. Land between the Bayfield Estate and A48; and
- F. Land between the A48 and M48.

Figure 5.6: Chepstow strategic growth options

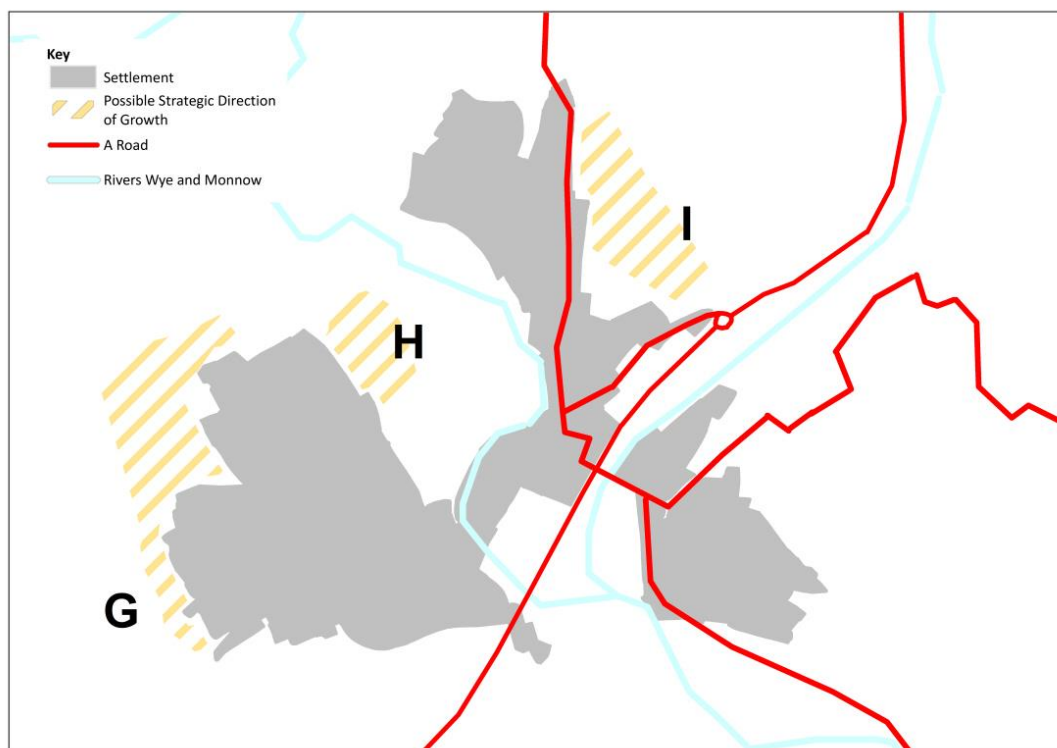


Monmouth

5.18 Three possible strategic growth areas/ options for Monmouth have been identified at this stage and are set out below and illustrated in **Figure 5.7**:

- G. Land west of Monmouth;
- H. Land central Monmouth; and
- I. Land north east of Monmouth.

Figure 5.7: Monmouth strategic growth options

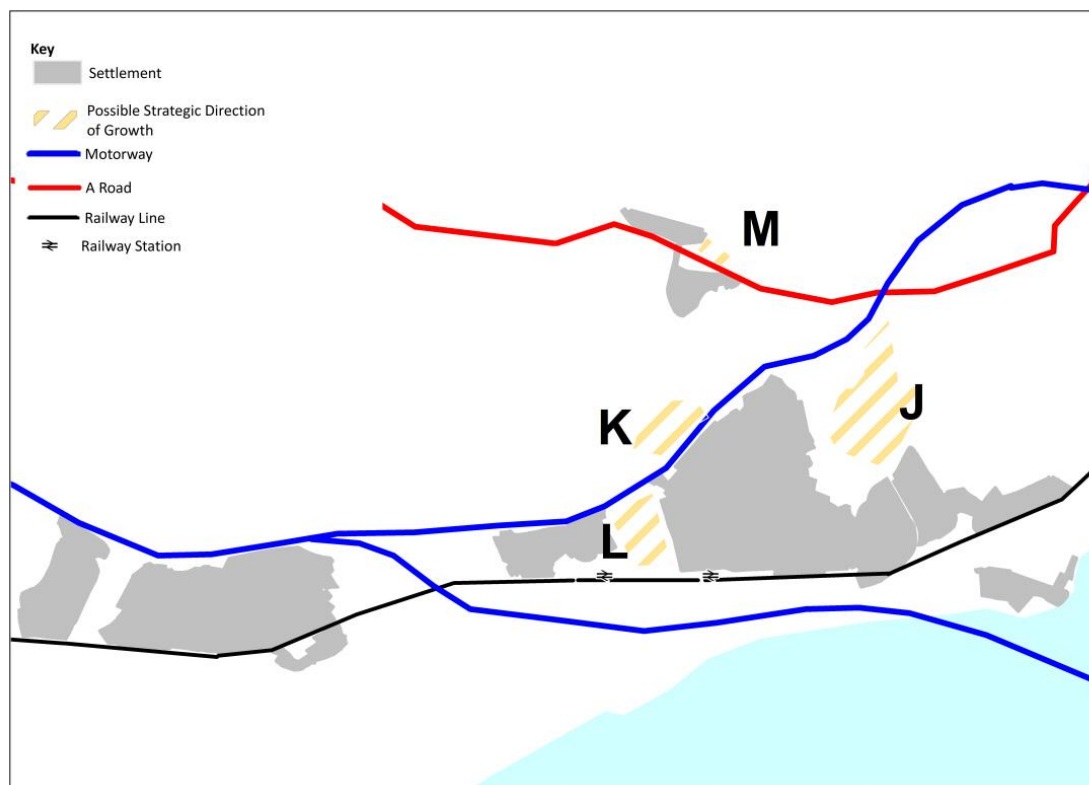


Severnside

5.19 Four possible strategic growth areas/ options for Severnside have been identified at this stage and are set out below and illustrated in **Figure 5.8**:

- J. Land north east of Caldicot;
- K. Land north west of Caldicot;
- L. Land west of Caldicot/ east of Rogiet; and
- M. Land east of Caerwent.

Figure 5.8: Severnside strategic growth options



6. Appraising the Reasonable Alternatives

Introduction

- 6.1 This chapter presents the summary findings of the appraisal of the December 2020 Growth and Spatial Options Paper strategic options.

Method

- 6.2 The strategic options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in **Appendix II**.
- 6.3 For each of the strategic options, the assessment examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see **Table 3.1**) as a methodological framework.
- 6.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.5 It is important to note that effects are predicted taking into account the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Monmouthshire County Council).
- 6.6 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2.

Summary appraisal findings for strategic options

Level of growth

- 6.7 The six options for the level of growth identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in **Appendix II** and summary findings provided below.

Table 6.1: ISA summary findings for growth options

ISA theme	Rank/ significant effect	Categorisation and rank					
		Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Economy and employment	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Population and communities	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Health and wellbeing	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Equalities, diversion and social inclusion	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Transport and movement	Rank	2	2	2	1	1	1
	Significant effect?	No	No	No	No	No	No
Natural resources (air, land, minerals and water)	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Biodiversity and geodiversity	Rank	1	2	3	4	5	6
	Significant effect?	No	No	No	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	6	5	4	3	2	1
	Significant effect?	No	No	No	No	No	No

- 6.8 For ISA themes relating to natural resources, biodiversity, the landscape and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors, and the potential mitigation measures available. Lower growth options are ultimately ranked more favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.
- 6.9 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment. Given the limited brownfield resource in the County, development is likely to be primarily delivered on greenfield land, with residual negative effects likely. The significance of this effect will increase as the level of growth increases. There is currently uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.
- 6.10 Similarly, for the transport ISA theme, options proposing a higher level of growth are more likely to result in impacts on the local highway network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking as a result of the current pandemic are considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, the higher growth levels are considered for their potential to deliver accessibility and infrastructure improvements and result in more self-contained communities, reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth options are ranked more favourably overall.
- 6.11 Option 1 is noted for potential negative effects of significance in relation to the ISA themes of economy and employment, population and communities, health and wellbeing and equalities, diversity and social inclusion. This is predominantly due to negative growth severely restricting opportunities to address a likely resultant demographic imbalance and economic decline. Under this option, a decline in younger age groups, particularly working age groups, is likely to result in job losses, and a decline in economic and local centres exacerbating rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, a lack of future development may not only severely limit opportunities to address changing housing needs in terms of types and tenures but is also likely to drive up house prices and exacerbate affordability issues.
- 6.12 The higher growth options (Options 5 and 6) are identified as performing better against ISA themes relating to the economy and employment, population and communities, health/ wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County.

Spatial strategy

- 6.13 Each of the four spatial strategy options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in **Appendix II** and summary findings provided below.

Table 6.1: Summary appraisal findings for the spatial strategy options

ISA Themes	Rank/ Significant effects	Categorisation and rank			
		Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Economy and Employment	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Population and Communities	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Health and wellbeing	Rank	1	1	3	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Equalities, diversity and social inclusion	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Transport and movement	Rank	1	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Natural Resources	Rank	1	1	3	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	2	2	1	3
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Yes - Negative
Historic Environment	Rank	=	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Climate Change	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

- 6.14 The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints; albeit in different areas of the County. However, it is recognised that mitigation could be provided and that development also has the potential to deliver positive effects environmental improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.
- 6.15 While similar conclusions can also be drawn in relation to biodiversity (given the presence of international, national and local designations throughout the County Borough), options can be differentiated between 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 WwTWs discharging into the upper reaches of both SACs. Option 4 directs the most growth to these Primary Settlements, followed by Options 1 and 2, and is therefore worst performing overall in terms of the biodiversity ISA theme.
- 6.16 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and in close proximity to landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have an uncertain effects in relation to the landscape and climate change themes.
- 6.17 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.
- 6.18 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment and facilities/ services. The importance of high levels of local accessibility to open space, services and facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.
- 6.19 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas, Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, 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 under Option 3 and Option 4 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.

- 6.20 Consideration is also given throughout the appraisal to the recent publication of the Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt “*around Newport and eastern parts of the region*”. This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire’s main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of a Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Strategic growth areas

- 6.21 Each of the potential strategic growth options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in **Appendix II** and summary findings provided below. It should be noted that in order to allow for a fair and comparative appraisal it was assumed that each strategic growth option could deliver the same quantum and type of development.

Abergavenny

Table 6.3 Summary appraisal findings for the strategic growth areas around Abergavenny

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option A	Option B	Option C
Economy and Employment	Rank	1	2	3
	Significant effect?	No	No	No
Population and Communities	Rank	1	2	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	2	2
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	2	3	1
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic Environment	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	3	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain
Climate Change	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain

- 6.22 No significant differences have been identified between Options for the Transport and Movement ISA theme.
- 6.23 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However, Option C performs most positively against the Equalities diversity and social inclusion as this Option best supports deprived communities to the west of the town.
- 6.24 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades

of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.

- 6.25 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Usk SAC. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.
- 6.26 Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the BBNP, its open character and hillside setting. Option A is also worst performing given its 'high/medium' sensitivity to residential development; as set out in the Monmouthshire Landscape Sensitivity Update Study (2020). Option B is also identified as having 'high/medium' sensitivity to residential development.
- 6.27 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Usk SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered; i.e. through improved accessibility to, and enhancement of, designated assets.
- 6.28 Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage.

Chepstow

Table 6.4: Summary appraisal findings for the strategic growth areas around Chepstow

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option D	Option E	Option F
Economy and Employment	Rank	3	2	1
	Significant effect?	No	No	No
Population and Communities	Rank	=	=	=
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	=	=	=
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	2	1	3
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	=	=	=
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	1	1	2
	Significant effect?	Uncertain	Uncertain	Yes - Negative
Landscape	Rank	2	1	3
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate Change	Rank	=	=	=
	Significant effect?	No	No	No

- 6.29 No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.
- 6.30 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.
- 6.31 All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

- 6.32 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, with the potential for long term negative effects.
- 6.33 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.
- 6.34 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.
- 6.35 For all Options, effects against Climate Change are uncertain at this stage.

Monmouth

Table 6.5: Summary appraisal findings for the strategic growth areas around Monmouth

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option G	Option H	Option I
Economy and Employment	Rank	2	1	3
	Significant effect?	No	No	No
Population and Communities	Rank	2	1	1
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	1	1
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	=	=	=
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic Environment	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate Change	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

- 6.36 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.
- 6.37 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.
- 6.38 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.
- 6.39 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects.

Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Wye SAC. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.

- 6.40 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).
- 6.41 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance').
- 6.42 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered; i.e. through improved accessibility to, and enhancement of, designated assets.
- 6.43 For all Options, effects against Climate Change are uncertain at this stage.

Severnside

Table 6.6: Summary appraisal findings for the strategic growth areas around Severnside

ISA Themes	Rank/ Significant effects	Categorisation and rank			
		Option J	Option K	Option L	Option M
Economy and Employment	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Population and Communities	Rank	1	2	1	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Equalities, diversity and social inclusion	Rank	2	3	1	4
	Significant effect?	No	No	No	No
Transport and movement	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Natural Resources	Rank	2	2	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	2	3	1
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	3	2	1	2
	Significant effect?	Uncertain	Uncertain	No	Uncertain
Landscape	Rank	3	3	2	1
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Climate Change	Rank	1	1	3	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

- 6.44 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network. Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres, services and facilities; and relatively limited potential to capitalise upon the strategic road network.
- 6.45 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities and the strategic road network/ sustainable transport opportunities.

- 6.46 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.
- 6.47 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.
- 6.48 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having 'medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated 'Green Wedge'. Option M is best performing in this respect, although there remains the potential for residual minor negative effects.
- 6.49 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gain, and the enhancement of designated assets.
- 6.50 Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage.

7. Developing the Preferred Strategy

Introduction

7.1 This Chapter presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

The Council's outline reasons for choosing the preferred strategy

7.2 It should be noted that the Council's reasons for progressing or rejecting strategic options are presented in the Growth and Spatial Options Background Paper (June 2021) that is published alongside the Preferred Strategy. These outline reasons are repeated in **Tables 7.1 and 7.2** below. A decision in terms of preferred strategic growth areas has not yet been made, as a result outline reasons for the selection or rejection of strategic growth areas are not presented in this Chapter.

Level of growth

Table 7.1: Outline reasons for choosing preferred growth option

Options (type)	Outline reasons
Option 1: Balanced Migration (with added policy assumptions)	<p>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.</p> <p>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 lead to job losses and 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.</p> <p>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.</p>

Options (type) Outline reasons

	<p>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.</p>
Option 2: WG 2018-based Principal Projection	<p>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.</p> <p>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.</p> <p>A decline in the working age population in the County with a declining work force unable to support local employment provision would lead to job losses and 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Option 3: WG 2018-based	<p>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</p>

Options (type)	Outline reasons
Principal Projection (with added policy assumptions)	<p>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.</p> <p>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.</p> <p>A decline in the working age population in the County with a declining work force unable to support local employment provision would lead to job losses and 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Option 4: Dwelling-led Average (based on dwelling completion rates)	<p>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 jobs, 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.</p> <p>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.</p>

Options (type)	Outline reasons
Option 5: Population-led (with added policy assumptions)	<p>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.</p> <p>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.</p> <p>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'. 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..</p> <p>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.</p>
Option 6: Employment-led (with added policy assumptions)	<p>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.</p> <p>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.</p>

- 7.3 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.
- 7.4 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.
- 7.5 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.
- 7.6 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.
- 7.7 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.

Location of growth

Table 7.2: Outline reasons for choosing preferred spatial option

Options (type)	Outline reasons
Option 1: Continuation of the Existing LDP Strategy	<p>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.</p> <p>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.</p> <p>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.</p>
Option 2: Distribute Growth Proportionately across the County's most Sustainable Settlements	<p>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'. 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.</p> <p>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.</p>
Option 3: Focus on M4 Corridor	<p>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.</p>

Options (type) Outline reasons

Option 4: Focus the North of the County 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.

- 7.8 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.
- 7.9 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.
- 7.10 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.

- 7.11 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.

Part 2: What are the ISA findings at this stage?

8. Introduction (to Part 2)

- 8.1 The aim of this chapter is to present an appraisal of the RLDP, as currently presented in the Preferred Strategy.

Methodology

- 8.2 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see **Table 3.1**) as a methodological framework. In total, there are ten ISA themes as follows:
- Economy and employment;
 - Population and communities;
 - Health and wellbeing;
 - Equalities, diversity and social inclusion;
 - Transport and movement;
 - Natural resources (air, land, minerals and water);
 - Biodiversity and geodiversity;
 - Historic environment;
 - Landscape; and
 - Climate change.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.¹² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

¹² Environmental Assessment of Plans and Programmes Regulations 2004

9. Appraisal of the Preferred Strategy

Introduction

- 9.1 As introduced above, the aim of this chapter is to present an appraisal of the Preferred Strategy under the ISA themes/ framework.

Overview of the Preferred Strategy

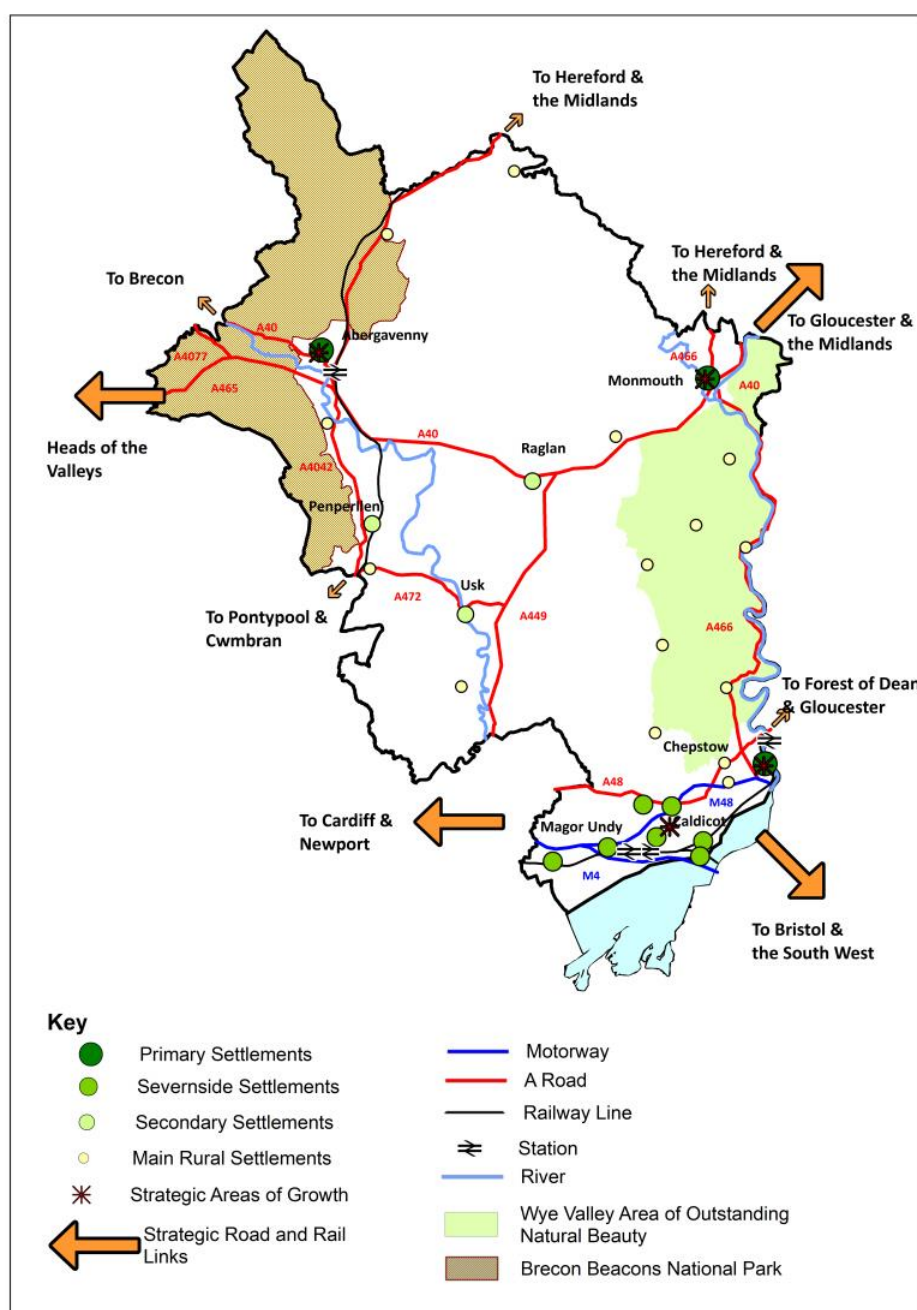
- 9.2 Strategic Policy S1 (Strategic Sustainable and Resilient Growth) and Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) set the spatial strategy for housing and employment growth in Monmouthshire during the plan period. It's important to note that at this stage the strategy remains high level, with no specific sites allocated to deliver the growth during the plan period.
- 9.3 Policy S1 states that the RLDP will make provision for 8,366 homes (to meet a housing requirement of 7,605 homes, including a 10% buffer) and 7,215 jobs over the Plan period 2018-2033. Development will be distributed across the County in a proportionate manner that reflects and addresses the aims of the overarching Sustainable and Resilient Communities Growth Strategy. It will distribute growth across Primary Settlements, Secondary Settlements, Severnside and those Rural Settlements identified as having capacity for growth and/or in need of development to sustain them, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. The level of growth will be proportionate to a settlement's size and amenities, and will reflect affordable housing need as identified in the LHMA in both urban and rural areas. **Table 9.1** sets out a summary of the overarching indicative spatial distribution of housing provision for the RLDP.

Table 9.9.1: Preferred indicative distribution of residential growth

Settlement hierarchy	Sustainable and Resilient Communities Strategy	
	Indicative % of distribution	Indicative No. of homes
Abergavenny (inc. Llanfoist)	23%	1,893
Chepstow	18%	1,521
Monmouth (inc. Wyesham)	17%	1,418
Total at Primary Settlements	58%	4,832
Caldicot, Caerwent, Crick, Magor Undy, Portskeewett, Rogiet & Sudbrook	28%	2,323
Penperlleni, Raglan & Usk	5%	449
Rural Settlements (See Policy S2 for the list of settlements)	9%	762
	Open countryside policies will apply where planning permission will only be allowed for certain types of development	

- 9.4 The proposed distribution of employment growth will be set out at the next stage in plan-making (Deposit RLDP); however, Policy S2 notes that employment growth will be consistent with the spatial strategy and commensurate to the level of housing growth. It can therefore be assumed that the majority of new employment land will be focussed at the Primary Settlements.
- 9.5 Existing land supply commitments include: 2018-21 completions (1,218 dwellings); sites where construction is already underway or that have planning permission subject to signing of a S106 agreement as at 01st April 2021 (1,642 dwellings), windfall allowance for sites that will deliver more than 10 dwellings (553 dwellings); small site allowance for sites that will deliver less than 10 dwellings (995 dwellings) and LDP rollover allocations (300 dwellings). Once all of the existing land supply commitments and allowances for windfall/infill sites and 'Rollover' sites have been taken into account, the RLDP will need to make provision for new site allocations to deliver 3,658 homes over and above the existing commitments.
- 9.6 The Preferred Strategy key diagram is provided below in **Figure 9.1**.

Figure 9.1: Preferred Strategy Key Diagram



Economy and employment

Appraisal of the Preferred Strategy

- 9.7 Strategic Policy S1 (Strategic Sustainable and Resilient Growth) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) and Strategic Policy S8 (Strategic Development Sites) collectively set the spatial strategy for housing and employment growth in Monmouthshire during the plan period. It is important to note that at this stage the strategy remains high level and no specific sites are allocated to deliver the growth.
- 9.8 Policy S1 states that the RLDP will make provision for 8,366 homes (to meet a housing requirement of 7,605 homes) and 7,215 jobs over the Plan period 2018-2033. The proposed distribution of these homes is set out in Policy S2 and discussed earlier in this Chapter. The proposed distribution of employment growth will be set out at the next stage in plan-making (Deposit RLDP); however, Policy S2 notes that employment growth will be consistent with the spatial strategy, it can therefore be assumed that the majority of new employment land will be focussed at the Primary Settlements.
- 9.9 The spatial strategy performs positively in relation to the ISA objective to maximise the economic contribution of the area to the Cardiff City, Bristol and wider South West Region, particularly in respect of directing housing growth to locations from which key regional employment hubs can be accessed. Abergavenny and Chepstow each have existing rail connections to both Newport and Cardiff, with services to Cardiff taking around 40-45 minutes from Abergavenny and around 40 minutes from Chepstow. Monmouth does not have a rail connection, though is around an hour's drive to central Cardiff. All three settlements are currently proposed to be served by future phases of the South East Wales Metro, a multi-modal transport network with services fulfilled by a combination of heavy rail, light rail and bus rapid transit. It is unlikely that all three main settlements will be served by the same transport mode given the absence of an existing rail connection to Monmouth, though all modes will likely increase capacity and frequency of services to Newport and Cardiff and will reduce journey times. This will enable workers to access key employment centres and jobs markets more quickly and more frequently, boosting the local and regional economy.
- 9.10 Distributing housing and employment growth between the three Primary Settlements will help ensure growth is dispersed across the plan area and not simply concentrated towards the M4 corridor in the south. For example, despite being accessible to Cardiff, Abergavenny is sufficiently far north that it serves as the regional centre for a number of smaller settlements at the north of the plan area. By delivering substantial growth at Abergavenny the spatial strategy will help sustain the rural economy of the smaller rural settlements which Abergavenny services.
- 9.11 By also distributing a substantial proportion of growth to the Severnside settlements the spatial strategy is likely to deliver further positive effects in relation to the economy and employment. The Severnside settlements (Caldicot, Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) are strategically located for access to the M4/ M48 corridors and to rail services between Cardiff and Bristol. Growth at these settlements would have strong potential to make an economic contribution to the Cardiff City Region by locating housing and employment growth in close proximity to regional economic opportunities, particularly at Cardiff and Newport. Severnside is already well served by public transport via Caldicot and Severn Tunnel Junction stations and, as with the Tier 1 settlements, public transport connectivity is likely to be enhanced later in the plan period as the rollout of the SE Wales Metro progresses. Additionally, the Severnside settlement cluster already represents a key employment hub in its own right and delivering housing growth will help ensure the continued vitality of key employment sites such as Castle Gate Business Park at Caldicot and the AB InBev brewery at Magor. However, housing growth at the south of the County is likely to also prove an attractive location for workers who commute to employment hubs outside the Cardiff City Region, particularly those who commute to Bristol which is a short drive or train journey away.

- 9.12 Strategic Policy S8 establishes a commitment to meeting an unspecified proportion of Monmouthshire's housing and employment need at strategic development sites. The Preferred Strategy sets out indicative strategic growth areas in the main towns of Abergavenny, Chepstow, Monmouth, and the Severnside area, which have been considered through the ISA process, see Part 1 of this Report. However, the Preferred Strategy does not identify preferred options for strategic sites at this stage and does not assign a quantum of growth to be met through them. Strategic and non-strategic site options will be considered further in due course through the ISA process and inform the development of the Deposit Plan.
- 9.13 Policy S13 sets out the quantum of employment land to be delivered throughout the Plan period, in accordance with the Spatial Strategy and the recommendations of the Employment Land Review (ELR) (2021). In line with Policy S13, provision will be made for a minimum of 43 ha of land on a suitable range and choice of sites for industrial and business development (classes B1, B2 and B8). This minimum requirement reflects a forecast scenario based on past take-up rates, and includes a five-year buffer to allow for choice and uncertainty in forecasting.
- 9.14 Policy S13 also seeks to protect existing employment land from conversion to "*alternative forms of development*". When considering the existing employment land supply, it is recognised that two large existing employment allocations - Quay Point and Gwent Europark, account for over half of the available supply of employment land. Whilst the ELR concludes that these sites should form part of the realistic supply of employment land, it also notes that it may be prudent of the RLDP to identify an increased level of employment allocations to enable further flexibility in the market and reduce reliance on these two sites. Further analysis in relation to the suitability and deliverability of existing Adopted LDP employment allocations will inform the Deposit RLDP.
- 9.15 The RLDP establishes support for a range of sites to meet employment needs to 2033, including local business hubs with printing or meeting room facilities for agile workers to utilise on demand, and small and medium sized enterprises (SMEs) needs which are a key sector in the County. It is considered that protecting existing employment sites whilst also delivering new employment land to meet needs will help maintain the vibrancy of Monmouthshire's economy as well as the Cardiff Capital Region's economy as a whole.
- 9.16 Consideration is also given through the Preferred Strategy to the shift in working routine seen throughout the Covid-19 pandemic. It aims to build on the shift in working practices and the benefits that have occurred during Covid-19, as recognised in Welsh Government's Building Better Places document (2020). The document acknowledges that even when all restrictions are lifted, the impact of working from home is likely to have longer term impacts on where people work. The reliance on staying connected has become of particular importance in this respect, and it is considered that reliable and good quality communication systems will be essential in the County's economic and social recovery. Strategic Policy S5 (Infrastructure Provision) therefore states that "*Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided in phase with proposed development.*" Infrastructure in this respect includes "*broadband infrastructure*" to enable effective homeworking.
- 9.17 The other strategic policies likely to have a direct effect in relation to economy and employment are Strategic Policy S14 (Rural Enterprise) and Strategic Policy S15 (Visitor Economy). Future Wales (2021) has expressed a commitment to supporting vibrant rural areas and improving the rural economy.¹³ The National Plan Policy 4 – Supporting Rural Communities, and Policy 5 – Supporting the Rural Economy, establish the national policy approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth. Policy S14 therefore seeks to sustain and enhance the economy of the County's rural settlements to ensure their continued viability, which is likely to have a long term positive effect on this theme. The role of the rural economy in the Covid-19 recovery has also been acknowledged in Welsh Government's Building Better Places policy document whereby tourism and visitor sectors within rural areas of Wales are noted as key areas to facilitate the Covid-19 economic recovery. This is reflected through Policy S15 which recognises the significance of tourism to Monmouthshire's economy, with the supporting text of the policy

¹³ Welsh Government (2020) Future Wales: the national plan 2040 [online] available at: <https://gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040>

stating that “*in rural areas tourism related development is an essential element in providing for a healthy diverse local economy*”. By establishing support in principle for development which provides or enhances sustainable tourism Policy S15 will help support and grow the tourism sector which has the additional benefit of distributing employment opportunities throughout small settlements and rural areas of the County. Collectively, this suite of policies is considered to perform positively in relation to the ISA objectives of contributing to the regional economy, strengthening and diversifying the economy and ensuring a distribution of employment opportunities throughout the plan area.

- 9.18 PPW11 equally values the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration and improvement in both urban and rural areas. As cross cutting topics a number of additional policies have potential for effects in relation to the economy and employment. Policy S11 (Retail and Commercial Centres Hierarchy) establishes a three-tier retail hierarchy, with the broad retail offer of the four ‘County towns’ of Abergavenny, Caldicot, Chepstow and Monmouth recognised as being of significance not just to the towns themselves but also their wider rural hinterlands. The local centres of Magor, Raglan and Usk are located at the second tier and are recognised as serving a more local convenience function, whilst the third tier applies to local centres within larger settlements. By focussing growth at the highest tier settlements the Preferred Strategy will help to support the vitality of existing centres.
- 9.19 Welsh Government’s commitment to better places, placemaking, quality outcomes and good design is evidenced throughout the Building Better Places (2020) paper, which identifies town centres as a policy area that should be the focus of consideration and action, in order to act as a catalyst for a recovery. The Preferred Strategy policy intention is therefore to protect town and local centre vitality and sustain the County’s main settlements as “*vibrant and attractive centres*” to ensure that they “*remain attractive places to live and visit*”. This is considered to perform positively in relation to the ISA objective to enhance the viability and vitality of town centres.
- 9.20 In terms of supporting the rural economy and tourist economy, Policy S18 (Green Infrastructure, Landscape and Nature Conservation) could have potential for indirect positive effects by protecting natural and built heritage attractions and thereby encouraging tourism development and tourist spend. For example, S18 seeks the protection of landscape and townscape character to protect and enhance “*landscape setting and quality of place*”. Additionally, S18(iii) highlights the importance of resilient ecosystems; requiring development to “*protect, positively manage and enhance biodiversity and geological interests.*”
- 9.21 The policies are also largely silent on skills and training, though Policy S6 does recognise the importance of securing education facilities through the development process where required. Skills and training are important considerations in terms of aligning the RLDP with current and emerging economic opportunities at both a local and regional scale and the Preferred Strategy would be strengthened by establishing a policy position on delivering high quality skills and training.
- 9.22 At this stage, the quantum of new employment land and number of jobs to be delivered during the plan period is known but the precise distribution of this growth is not. The proposed distribution of employment growth will be set out at the next stage in plan-making (Deposit RLDP) and considered through the ISA process.

Summary appraisal of the Preferred Strategy

- 9.23 The Preferred Strategy proposes the delivery of new employment land and homes to meet identified needs and provide flexibility during the plan period. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. The Preferred Strategy looks to capitalise on Monmouthshire’s strategic location within the Cardiff City Region, links to the SW/ Bristol Region, and its access to the M4, M48 and mainline rail corridors to take advantage of local and regional economic opportunities. Alongside supporting the development of new employment in job growth sectors (new technologies and advanced manufacturing, IT and cyber security, tourism and low carbon

sustainable technologies) it will be vitally important to support and enhance education and skills related infrastructure in these areas to ensure that people have the right skills for these roles.

- 9.24 Overall, the Preferred Strategy is predicted to have a significant long term positive effect on the economy and employment theme. It supports the growth aspirations of the Council as well as takes advantage of opportunities arising from the strategic location between the Great Western Cities (Cardiff, Newport and Bristol); utilising links with SW/ Bristol Region, the Cardiff Capital Region City Deal and South East Wales Metro proposals. As a result, it should help to assist in the Covid-19 recovery, increasing economic activity and potentially reduce out-commuting, though the County's proximity to the Bristol City Region and the recent removal of Severn Bridge tolls will continue to be significant influences on commuting patterns. Emphasis will also be placed on maintaining and enabling the sustainability improvements that have arisen from the Covid-19 situation (i.e. increased levels of working from home), as a catalyst for economic recovery and prosperity.

Appraisal of cumulative effects

- 9.25 Monmouthshire's location within the ten-authority Cardiff City Region gives it a broad regional context, and its location at the eastern edge of the region means it is also within the influence of economic hubs in England, particularly the Bristol City Region and local economic hubs in Gloucestershire and Herefordshire. In this context there are potential cumulative effects on the regional economy from development in the plan area and vice versa.
- 9.26 The Cardiff Capital Region City Deal identifies regional economic challenges and opportunities for the ten authorities which comprise the Cardiff Capital Region. Addressing economic challenges and maximising opportunities are right at the heart of the rationale behind the City Deal and there is likely to be significant potential for positive cumulative effects in relation to economy and employment in this context.
- 9.27 Development proposals in Newport are likely to be of particular significance in terms of cumulative effects from growth in Monmouthshire. Identified as a National Growth Area (Future Wales, 2021), Newport is a significant employment hub and population centre adjacent to Monmouthshire's southern boundary. The Newport LDP was adopted in January 2015 and proposes the delivery of 11,623 dwellings and 172ha of new employment land by 2026. An Eastern Expansion Area is proposed, a strategic mixed-use development, which will deliver 5,400 new homes and 39.5 ha of employment. This additional employment land could provide additional regional employment opportunities for workers from Monmouthshire and could potentially further bolster the business case for the eastward expansion of the South East Wales Metro. There could be particular cross boundary significance in relation to housing growth at the Severnside settlements as this could directly support the vitality of employment hubs along the M4 corridor. This will help maximise regional economic opportunities and is considered likely to have significant long term positive effects in relation to Monmouthshire and the Cardiff Capital Region more broadly. The Newport LDP also safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road as the Duffryn Link Road between Maesglas and Coedkernew and the North South Link - Llanwern. Proposed development could increase traffic along the M4, A4042 and A449. However, in time the SE Wales Metro will be likely to relieve some of this additional traffic burden, particularly in relation to radial commuting between Monmouth/ Abergavenny/ Chepstow and employment hubs at Newport and Cardiff.
- 9.28 The visitor economy is significant in Monmouthshire and the Brecon Beacons National Park is a key component of this in terms of visitor accommodation and associated services. The Brecon Beacons National Park Authority is its own LPA and therefore is able to propose development within Monmouthshire but outside the Monmouthshire LDP plan area. However, the adopted Brecon Beacons National Park Local Plan (2013) proposes no significant growth during the plan period or in close proximity to the Monmouthshire administrative boundary. A revision of the LDP is currently being carried out and a Preferred Strategy Document was published for consultation in July 2019. However following a review of their LDP evidence base in light of the July 2020 Welsh Government guidance, the Authority determined that they needed to revisit their Strategic Position. They have recently undertake a consultation on a Revised Delivery Agreement and Towards a Preferred Strategy document which sets out their rationale for

revisiting the Preferred Strategy and a shift in their policy focus, the consultation closed on 21st May 2021. While the exact level and location of growth is unknown at this stage, it is considered that focus will remain in the key settlements of Brecon, Crickhowell, Hay-on-Wye and Talgarth. Development therefore is not likely to result in any significant interactions with development being proposed through the Monmouthshire RLDP. Therefore, no significant effects are anticipated in relation to economy and employment.

- 9.29 There is also potential for cumulative effects in relation to development proposed west of the plan area in Torfaen and Blaenau Gwent, particularly given Abergavenny's strategic location on the A456 Heads of the Valleys Road, which links the Brecon Beacons and Monmouthshire with key settlements and employment sites in the north of the Cardiff Capital Region. In this context the replacement Blaenau Gwent LDP proposes two expansions of the Rassau Industrial Estate in the Ebbw Vale Enterprise Zone and an entirely new employment allocation at Rhyd-y-Blew, also in the Ebbw Vale Enterprise Zone. It is considered that cumulative positive effects are likely in relation to economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.
- 9.30 The two English LPAs of Herefordshire Council and Forest of Dean District Council are adjacent to the plan area's eastern boundary, with much of the boundary of both comprising the Wye Valley Area of Outstanding Natural Beauty (AONB). There are key settlements in both authorities which have strong functional links with Monmouthshire as both Ross-on-Wye in Herefordshire and Coleford in Gloucestershire are located a short distance from Monmouth along the A40 and A4136 respectively. Housing and employment growth are proposed at both settlements through the adopted Herefordshire Local Plan (2015) and adopted Forest of Dean Allocations Plan (2018). There could be potential to increase traffic on key roads into and out of Monmouth in particular, though positive effects are considered likely overall by virtue of supporting the wider regional economy.

Population and communities

Appraisal of the Preferred Strategy

- 9.31 A key consideration under the population and communities ISA theme is the provision of the right number of homes in the right places, including delivering a sufficient mix of housing types and tenures to meet different identified needs within the community.
- 9.32 Strategic Policy S1 (Strategic Sustainable and Resilient Growth) sets the total quantum of housing need in Monmouthshire over the plan period at 7,605 dwellings, or 507 dwellings per annum. The level of housing need is based on a population-led scenario with added policy assumptions to address the County's key demographic and affordability issues, modelled by Edge Analytics. This is considered to be the most appropriate growth strategy for the County over the Plan period to deliver the Council's core purpose of helping to build sustainable and resilient communities that support the well-being of current and future generations. Policy S1 identifies a total housing target of 8,366 dwellings over the plan period based on a 10% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. On this basis, Policy S1 is considered to have a significant long term positive effect as it proposes the delivery of enough new homes to meet identified needs, including affordable housing need, and includes some flexibility should any sites not come forward.
- 9.33 In terms of the location of new housing and employment, the Preferred Strategy sets out indicative strategic growth areas in the main towns of Abergavenny, Chepstow, Monmouth, and the Severnside area, which have been considered through the ISA process, please refer to Part 1 of this ISA Report. While specific development sites are not currently proposed, these detailed elements will be set out in the Deposit RLDP.
- 9.34 The Preferred Spatial Strategy seeks to ensure growth reflects and addresses the aims of the overarching Sustainable and Resilient Communities Growth Strategy.
- 9.35 A "*proportionate*" distribution of housing growth is proposed across the plan area through Strategic Policies S1 and S2 (Spatial Distribution of Development - Settlement Hierarchy). The supporting text of Policy S2 defines this as "*a level of growth directed towards a settlement will be proportionate to its population size*". As a starting point this is considered to represent a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need, i.e. the larger settlements which offer the broadest range of services, facilities and transport options. Under this distribution, Abergavenny is allocated 23% of growth over the plan period, Chepstow 18% and Monmouth 17%. This translates to around 1,893 new dwellings at Abergavenny, 1,521 at Chepstow and 1,418 at Monmouth. The Severnside settlements would collectively deliver 2,323 dwellings, whilst the three Tier 3 settlements would average 150 dwellings each. The remaining dwellings would be distributed between the main and minor rural settlements. The strengths of this approach are that smaller settlements all receive some allocated housing growth, helping to meet local housing need where it arises and ensuring the benefits of growth, such as the provision of new community infrastructure, are not simply directed to the highest tier settlements.
- 9.36 The Strategy incorporates an affordable housing policy-led element, which will reflect affordable housing need as identified in the Local Housing Market Assessment (LHMA) in both urban and rural areas. The aim is to meet 10% of the LHMA need on housing sites which deliver 50% affordable housing.
- 9.37 Policy S7 (Affordable Housing) identifies the affordable housing target for the Plan period as 2,450 homes. Further detail relating to affordable housing percentage thresholds will be included in the Deposit RLDP to reflect the outcomes of the Council's emerging viability work. The supporting text of the policy notes that affordable housing is a key issue for the RLDP and will address issues associated with the County's high house prices (relative to the Welsh average and relative to earnings) such as difficulties attracting and retaining younger age groups and anticipated increased demand for housing in Monmouthshire related to the removal of the Severn Bridge Tolls.

- 9.38 The second key population and communities ISA objective is to enhance design quality to create great places. However, it is considered that design quality is not a spatial matter and therefore is not meaningfully influenced by spatial strategy. Neutral effects are therefore anticipated in relation to this objective.
- 9.39 On balance it is considered that the preferred strategy performs broadly positively in relation to the population and communities ISA theme given it will deliver above the level of objectively assessed housing need. Growth will be distributed proportionately across Monmouthshire across the County in a manner that reflects and addresses the aims of the Sustainable and Resilient Communities Growth Strategy, to meet needs broadly where they are likely to arise.
- 9.40 Other strategic policies likely to have a direct effect in relation to population and communities are Policy S3 (Sustainable Placemaking & High Quality Design), Policy S5 (Infrastructure Provision), and Policy S12 (Community and Recreation Facilities).
- 9.41 Policy S3 (Sustainable Placemaking) establishes a range of criteria by which development will be expected to contribute to *“high quality, attractive and sustainable places that support the well-being of the community”*. This includes safe and inclusive design, co-locating different land uses to maximise public transport accessibility, incorporating Green Infrastructure and leveraging the natural, historic and built character of a site to contribute to quality placemaking.
- 9.42 Policy S5 (Infrastructure Provision) emphasises the importance of infrastructure in ensuring the sustainability of new development. The policy presents a comprehensive approach to seeking suitable new infrastructure through the development process, effectively establishing a hierarchy of mechanisms for infrastructure delivery. It also sets an expectation that adequate infrastructure *“must be in place or provided in phase with proposed development”*, though where existing infrastructure is not adequate to serve the development, *“new or improved infrastructure and facilities”* must be provided.
- 9.43 In instances where on site infrastructure provision is not appropriate or not possible then the policy seeks a financial contribution towards off site provision. An expansive list of potential planning obligations is also presented which will be sought where infrastructure improvements are *“necessary to make development acceptable”*.
- 9.44 Necessary infrastructure in this respect includes *“broadband infrastructure”* to enable effective homeworking and communication, reflecting the shift in working routine seen throughout the Covid-19 pandemic. The Spatial Strategy aims to build on the change in working practices and lifestyles seen, capitalising upon the benefits that have occurred during Covid-19, and as recognised in Welsh Government’s Building Better Places response. The Building Better Places document acknowledges that even when all restrictions are lifted, the impacts on people working from home are likely to have longer term impacts on planning for sustainable communities. This is reflected through Policy S5 supporting policy text, which highlights that having reliable and good quality communication systems in place is essential in helping the economic and social recovery, as a result of Covid-19.
- 9.45 Policy S12 (Community and Recreation Facilities) performs positively in terms of planning for sustainable communities, focussing on ensuring provision or enhancement of accessible community and recreation facilities, defined in the supporting text as *“facilities used by the local communities for leisure, social, health, education and cultural purposes”*. The Policy also establishes a presumption against the unjustified loss of such facilities.
- 9.46 It is important that RLDP plans for the needs of the gypsy and travellers as well as the settled community. Policy S9 (Gypsy and Travellers) seeks to address this through a high-level commitment that *“land will be made available to accommodate future unmet gypsy and traveller accommodation needs”* where such need is supported by recent evidence. Specific criteria based policies to assess the development of Gypsy and Traveller Accommodation will be considered within the Deposit RLDP.
- 9.47 This suite of policies is considered to perform positively in relation to the population and communities ISA theme on the basis that they provide detailed and robust policy support for the provision of sustainable development by seeking that adequate community infrastructure accompanies new development either directly or via off site contributions. The policies

collectively protect existing facilities and look to deliver high quality placemaking through the development process, including a requirement that new development seeks to ensure that services and facilities are accessible by public transport where possible.

Summary appraisal of the Preferred Strategy

- 9.48 The Preferred Strategy proposes the delivery of new housing and employment land which meets and exceeds Monmouthshire's objectively assessed housing need of 8,366 dwellings (including a 10% buffer) and delivers 7,215 net new jobs. The Preferred Strategy is based on a population-led scenario with added policy assumptions to address the County's key demographic and affordability issues. Distributing development across the County in a proportionate manner will deliver the aims of the overarching Sustainable and Resilient Communities Growth Strategy, while also having regard to the overarching principles of Future Wales 2040. Growth will be "*guided towards building sustainable places that support placemaking principles*", but applied within a Monmouthshire setting to reflect the predominantly rural context, and will reflect affordable housing need as identified in the LHMA.
- 9.49 Focussing growth at locations which are best served by existing services, facilities and community infrastructure; will help ensure that the majority of growth is located in reasonably close proximity to shops, schools, employment and healthcare whilst also providing opportunities to deliver new community infrastructure on or off site as necessary. The proportionate distribution of growth means that whilst the majority of growth is delivered at the most sustainable settlements, the smaller rural and remote settlements still receive some new growth and the associated benefits, particularly by introducing additional housing choice for first time buyers and elderly rural residents who may otherwise have found it challenging to remain living in their communities.
- 9.50 Overall, the Preferred Strategy is predicted to have a significant long term positive effect in relation to the population and communities ISA theme. It supports the Council's core objective of building sustainable and resilient communities across Monmouthshire, and tackling the County's pressing affordable housing challenge, in the long term. By doing so it is considered that the Preferred Strategy will have associated benefits for the Council's social objectives, including building the housing needs of different groups within the community, providing a wide range of choice of housing types and tenures in both urban and rural areas.
- 9.51 The spatial strategy also gives consideration to the pandemic impact, and the need to assist in the Covid-19 recovery, and maintaining and enabling the sustainable improvements that have arisen from the situation. This is reflected through Future Wales 2040, with examples including greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres; and the provision of locally accessible green spaces. The importance of these challenges/ opportunities is reflected through the RLDP policy framework, supporting long term social and economic growth, good communication and resilient places.

Appraisal of cumulative effects

- 9.52 Development proposed within the Preferred Strategy has the potential for cumulative effects with growth proposed by other authorities within and beyond the Cardiff Capital Region, particularly in relation to the supply of a sufficient quantity of the new homes in sustainable locations.
- 9.53 The adopted and emerging development plans of all the surrounding local authorities propose meeting or exceeding their housing need. This means that the Preferred Strategy's proposed housing delivery is contributing to a regional position of housing and infrastructure needs being met where it arises, which is a significant positive cumulative effect in relation to the population and communities ISA theme.
- 9.54 In this context there are likely to be positive effects in relation to accessibility to services and facilities from the in-combination effects of proposed enhancements to cross-boundary public transport through the Cardiff City Deal. This could help make it easier to access existing services and facilities available at higher tier settlements, including those further afield at

Newport and Cardiff, even in locations where the level of growth proposed may not support widespread provision of new local facilities.

Health and wellbeing

Appraisal of the Preferred Strategy

- 9.55 A key aspect of achieving positive health and wellbeing outcomes through new development is the extent to which residents are able to make healthy travel choices for accessing key services, facilities and employment. In practice this means locating development within reasonable walking or cycling distance of such facilities and linking it with suitable walking and cycling infrastructure to connect new development with existing services. In the absence of a strategy underpinned by specific site options it is challenging to draw detailed conclusions in this respect.
- 9.56 However, it is recognised that the RLDP will deliver the aims of the Sustainable and Resilient Communities Strategy; promoting an appropriate level and spatial distribution of housing and employment growth for the County which assists in addressing local demographic and affordability challenges. By virtue of directing the majority of growth to settlements in the two highest tiers of the settlement hierarchy the preferred strategy is likely to focus growth at locations which offer the potential for sustainable access to local services and facilities. For example, much of the growth directed to Abergavenny will likely be delivered within around 1.5 miles of the town centre, which is considered to be a reasonable cycling distance. Correspondingly, by directing a proportionately small amount of growth to the Tier 3, 4 and 5 the preferred strategy avoids significant growth at smaller settlements which are likely to have a higher rate of car dependency. This is consistent with the RLDP objective of enabling healthier lifestyles.
- 9.57 Therefore, while the actual degree of walking and cycling connectivity will partly be determined by detailed matters of design and layout, it is considered that in spatial terms the Preferred Strategy will direct growth to locations with good potential for accessing services via healthy transport options and therefore performs broadly positively in relation to health and wellbeing.
- 9.58 Consideration is also given to the impact of the Covid-19 pandemic. Building Better Places Wales acknowledges the behavioural shift of increased cycling and walking activity, and new working from home patterns which have reduced overall need to travel. The RLDP policy framework seeks to maximise opportunities and further secure in the long-term this positive transport modal shift, kick started by the Covid-19 pandemic, from the car to active travel car-free journeys. Strategic Policy 10 (Sustainable Transport) performs particularly positively in this respect.
- 9.59 Policy S10 (Sustainable Transport) stands out as being of particular significance in relation to health and wellbeing as it includes an explicit requirement for development proposals to “*reduce the need to travel*” and “*increase provision for walking and cycling*”. The policy identifies that the existing Active Travel Network in Monmouthshire will need enhancing and expanding to ensure that walking and cycling are effectively promoted. The Active Travel Network is established by the Active Travel (Wales) Act 2013 and requires authorities to seek continuous improvement in cycling and pedestrian infrastructure. This means the policy is underpinned by a strong legislative platform which could act as an effective hook for ensuring developers design-in walking and cycling connectivity to the existing network when delivering new developments. Delivery and enhancement of Green Infrastructure through the development process as per Policy S18 is likely to be an important element of boosting walking and cycling.
- 9.60 Other strategic policies likely to have a direct effect in relation to health and wellbeing are Policy S3 (Sustainable Placemaking & High Quality Design), Policy S12 (Community and Recreation Facilities) and S18 (Green Infrastructure, Landscape and Nature Conservation).
- 9.61 Policy S12 (Community and Recreation Facilities) offers support in principle for development proposals which provide or enhance community facilities, the definition of which includes GP surgeries and health centres. Similarly, the policy establishes a presumption against the

unjustified loss of such facilities. It is considered that the policy is relatively passive, i.e. simply supports such facilities coming forward rather than actively seeks their provision. However, in the context of Monmouthshire, where the need for growth is not acute, this is considered a proportionate approach.

- 9.62 Policy S3 (Sustainable Placemaking & High Quality Design) could help support health and wellbeing by promoting the “*co-location of uses in order to maximise opportunities for active travel*”. This is understood to mean delivering a mixed range of services and facilities across the different use classes at the same accessible location so that residents only need to walk or cycle to one place to access retail, employment, leisure and so on.
- 9.63 The importance of sustainable placemaking has been identified in the Building Better Places document. Policy priorities include placing greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Policy S3 is therefore anticipated to lead to positive effects in terms of creating and sustaining high quality, connected communities. Other policies likely to perform positively in this respect include Policy S11 (Retail & Commercial Centres Hierarchy), Policy S12 – Community and Recreation Facilities, and Policy S18 (Green Infrastructure, Landscape and Nature Conservation).
- 9.64 It is also recognised that Monmouthshire is a largely rural plan area and in practice there will likely continue to be a degree of car dependency for many residents to reach some higher tier services and employment where these are not available locally. However conversely, the Preferred Strategy acknowledges the behavioural shift of increased working from home patterns, which has been brought about by the unprecedented impact of the Covid-19 pandemic. Collectively, it is considered that the preferred strategy will have a minor positive effect in relation to health and wellbeing.

Summary appraisal of the Preferred Strategy

- 9.65 Distributing development across the County in a proportionate manner will deliver the aims of the overarching Sustainable and Resilient Communities Growth Strategy, while also having regard to the overarching principles of Future Wales 2040. Distributing growth proportionately across rural and urban areas will enable the provision of market and affordable housing in both urban and rural areas and, importantly, provide the opportunity to address the unbalanced demography, improve labour force retention by retaining/ attracting younger adult population age groups, and assists in addressing the County's housing affordability challenge.
- 9.66 Proposing growth according to the settlement hierarchy is positive as the majority of development is directed towards the higher tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. This will likely present opportunities to link new development with the existing walking, cycling and Green Infrastructure networks at each of the settlements, whilst also offering potential to secure enhancements to these networks through the development process. Creating and sustaining communities and facilitating accessible and healthy environments is anticipated to lead to long term positive effects on overall health and wellbeing, recognising that placemaking is considered to be a core value in the Covid-19 recovery in Wales.
- 9.67 It is also recognised that Monmouthshire is a largely rural plan area and in this context many of the smaller settlements which are allocated a small proportion of growth are unlikely to support walking and cycling access to services. Despite this it is important that such settlements receive the benefits of modest growth to sustain their vitality and although the Tier 3, 4 and 5 settlements are unlikely to support healthy travel options or access to healthcare facilities, collectively they are allocated only 14% of the residential growth. In light of this it is considered appropriate that some growth is directed to the rural settlements.
- 9.68 Where possible the Preferred Strategy supports growth at locations from which goods, services and local employment could potentially be reached via healthy travel options, subject to detailed matters of site design and layout. It also directs the majority of housing growth to settlements with the widest range of healthcare facilities and requires that such facilities are enhanced as necessary through the development process to continue to provide a high quality

service. While it is likely that the Preferred Strategy will have a long term positive effect on health and wellbeing, it is not possible to conclude it will be significant at this stage. The precise location and scale of development is not currently known and will influence the significance of residual effects.

Appraisal of cumulative effects

- 9.69 The rural nature and substantial size of Monmouthshire contribute to its key settlements having a high degree of self-containment in terms of walking and cycling infrastructure, though some indirect inter-settlement connectivity exists through long distance rights of way and bridleways which crisscross the County. In this context there are limited strategic opportunities to seek cross boundary Active Travel Network infrastructure or to leverage the networks of other regional authorities to build a coherent consolidated network. However, in the context of the Welsh Government's support for active travel and modal shift it is evident that individual authorities are increasingly seeking to incentivise walking and cycling. These efforts will likely contribute to a positive cumulative effect on the overall health outcomes of residents in the Cardiff Capital Region.
- 9.70 The adopted Brecon Beacons National Park LDP (2013) and emerging LDP2 (2021) reiterate the role of the National Park as a sought-after destination for accessing the natural environment and growth within the Monmouthshire plan area will enable a greater number of people to access the Park for recreation and leisure with associated health and wellbeing benefits. For example, the Monmouthshire Preferred Strategy will deliver a substantial proportion of new residential development at Abergavenny from which access to the popular walking trails of Sugarloaf Mountain is easily achievable.

Equalities, diversity and social inclusion

Appraisal of the Preferred Strategy

- 9.71 The focus of the equalities, diversity and social inclusion ISA theme is reducing poverty and inequality, tackling social exclusion and promoting community cohesion. Many aspects of equalities, diversity and social inclusion do not have a spatial dimension and are unlikely to be directly affected by the spatial distribution of growth through the Preferred Strategy. For example, promoting community cohesion is likely to be most directly influenced through detailed policies which have the granularity to deliver focused responses at specific locations.
- 9.72 However, it is considered that distributing growth across the County in a proportionate manner that reflects and addresses the aims of the Sustainable and Resilient Communities Growth Strategy, will help to support and sustain a hierarchy of vibrant centres across the County. Housing and employment growth will be focused primarily at the high tier settlements; with an appropriate level also channelled to the County's most sustainable rural settlements to facilitate the creation of sustainable and resilient communities throughout Monmouthshire. This can be significant in enabling local people to remain in their communities rather than have to seek opportunities for housing and employment elsewhere.
- 9.73 At a broad conceptual level this is considered a positive approach to reducing inequalities between rural and urban settlements where these exist. In principle the Preferred Strategy may have potential for a long term minor positive effect. However, it is difficult to conclude that growth in rural settlements and rural areas will address existing deprivation in terms of access to jobs, healthcare and opportunities as the proportionate approach to distribution means growth will be unlikely of a scale which unlocks significant investment or enhancement in these areas. On balance, it is considered that the scale and distribution of growth is likely to have a minor positive effect in relation to equalities, diversity and social inclusion.
- 9.74 The Strategy also incorporates an affordable housing policy-led element, which seeks to assist in addressing this fundamental challenge by providing opportunities to retain/house those in need of affordable homes.¹⁴ These dwellings will be delivered on sites comprising at least 50% affordable housing and will meet 10% of the total affordable housing need within the County identified by Monmouthshire's Local Housing Market Assessment 2020. The supporting text of the policy notes that affordable housing is a key issue for the RLDP and will address issues associated with the County's high house prices (relative to the Welsh average and relative to earnings) such as difficulties attracting and retaining younger age groups and anticipated increased demand for housing in Monmouthshire related to the removal of the Severn Bridge Tolls.
- 9.75 Other strategic policies most likely to have indirect effects on equalities, diversity and social inclusion are Policies S3 (Sustainable Placemaking & High Quality Design), S5 (Infrastructure and Facilities) and S7 (Affordable Housing).
- 9.76 There is clearly an economic and educational dimension to tackling poverty and exclusion as it is critical that people are given the opportunity to acquire skills and education which empowers them to enter the workplace and find stable, high quality employment. In this sense Policy S5 (Infrastructure and Facilities) could potentially play a role through the requirement to provide "*new or improved infrastructure and facilities to remedy deficiencies*" given that this includes education facilities. However, where deficiencies in provision currently exist it is not clear whether the policy would be effective in addressing the existing shortfall as well as providing additional capacity for new development, or whether this simply means existing provision would be deficient once additional growth is added. Effects are uncertain in this respect.
- 9.77 Placemaking can play a role in tackling social exclusion through well designed, barrier-free environments which can be entered and used safely and with dignity by all members of the community. Policy S3 (Sustainable Placemaking & High Quality Design) seeks sustainable places which support community wellbeing, including through the implementation of "*safe and*

¹⁴ Affordable housing as defined in Technical Advice Note 2 Planning and Affordable Housing (WG, 2006)

inclusive design that offers ease of access for all" and could have potential for minor positive effects.

- 9.78 Access to a range of types and tenures of genuinely affordable housing is an important element of tackling poverty and social exclusion. Policy S7 (Affordable Housing) will therefore be a key lever by which affordable housing is delivered in Monmouthshire. The supporting text of the policy recognises that certain groups within the community are often particularly in need of affordable housing, such as elderly people and younger age groups who may otherwise not be able to afford to continue living locally. In the context of Monmouthshire where average house prices are significantly above the average for Wales it will be of great importance that a sufficient range and choice of affordable housing is delivered which enables people to remain living in their community if they wish to do so. In principle, long term positive effects are considered likely.

Summary appraisal of the Preferred Strategy

- 9.79 The Preferred Strategy's proportionate distribution of growth in accordance with the aims of the Sustainable and Resilient Communities Growth Strategy means that small rural communities will see some of the benefits of development, including the potential for delivering affordable housing in rural areas which could help to sustain the vitality and viability of rural settlements. A thriving hierarchy of settlements across the plan area will be an important aspect of tackling inequalities and deprivation within Monmouthshire in terms of ensuring access to employment, education and services at or near where the need for them arises. The Preferred Strategy also includes policy requirements which could help to deliver new or enhanced infrastructure, including education and training, across the plan area to help address deficiencies in provision. Additional policy requirements could help to create and sustain accessible, inclusive places through the development process which promote social inclusion and remove barriers to access.
- 9.80 However, at this stage of plan making details on some key aspects of tackling inequality remain uncertain. It is difficult to measure the potential effects of the Preferred Strategy on protected characteristics¹⁵ who are particularly affected by poverty, inequality and social exclusion as the degree of effect could vary between these groups. Nevertheless, the principle of a proportionate distribution of growth and a greater focus of housing development at the settlements with the highest levels of housing need is considered to be positive. While it is likely that the Preferred Strategy will have a long term positive effect on equalities, diversity and social inclusion, it is not possible to conclude it will be significant at this stage. The precise location and scale of development at sites is not currently known and will influence the significance of residual effects.

Appraisal of cumulative effects

- 9.81 Addressing the equalities, diversity and social inclusion objectives is not considered to be a primarily spatial matter. In this sense there are unlikely to be significant cumulative effects from development proposed in the Preferred Strategy and development in surrounding authorities.
- 9.82 However, there is a degree of cross-cutting between the equalities theme and other ISA themes, particularly in relation to the role of affordable housing and educational opportunities in tackling entrenched poverty and deprivation. In this sense the fact that Monmouthshire and its regional partners are all proposing meeting or exceeding their housing need could be perceived as a positive, as it could offer opportunities to meet complex housing needs within particularly deprived communities, particularly in post-industrial settlements which have struggled over time to develop their economic vitality.
- 9.83 Additionally, it is recognised that the proposed enhancements to regional public transport through the Cardiff Capital Region City Deal and SE Wales Metro rollout will have potential to ease access to employment and training opportunities as well as services more broadly.

¹⁵ The following are protected characteristics under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Increased accessibility could have potential to reduce social exclusion and reduce some dimensions of deprivation.

- 9.84 It is considered that cumulative effects in relation to equalities, diversity and social exclusion are likely to be a minor positive effect overall. Although elements of tackling entrenched deprivation and inequality are likely to be influenced by targeted action addressing specific needs at a local level, the collective action of authorities at a regional scale is likely to deliver similar benefit, or potentially even greater benefit, from all the investment being stimulated through the Cardiff City Deal and other regional LDPs.

Transport and movement

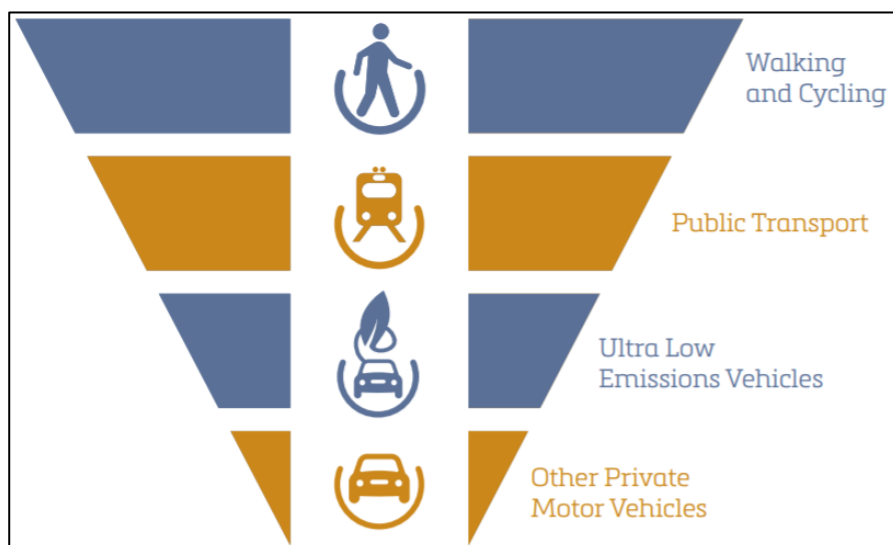
Appraisal of the Preferred Strategy

- 9.85 The transport and movement ISA objectives include improving access to jobs and services, reducing private vehicle use through promoting active travel and encouraging modal shift, and improving access to high speed digital infrastructure. The Spatial Strategy seeks to maximise the opportunities presented by the Covid-19 pandemic, and subsequent behavioural shift seen in people's commuting patterns, such as increased working from home.
- 9.86 The distribution of growth proposed by the Preferred Strategy (as set out earlier in this Chapter) performs reasonably positively in relation to the first of these objectives as it capitalises on existing transport links at the higher tier settlements to direct growth to locations served by transport hubs. By directing the majority of housing growth to the Tier 1 settlements the strategy ensures that new residential development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Bristol and Newport. Similarly, new employment growth in the Tier 1 settlements will be accessible by train or, in the case of Monmouth, by bus. However, in the absence of specific sites underpinning the strategy it is challenging to draw detailed conclusions in terms of improving access to specific jobs and services opportunities. For example, although Abergavenny and Chepstow benefit from train stations served by frequent services, Abergavenny station is at the far south of the settlement.
- 9.87 New development at the far north of the settlement may therefore find the station less accessible than new development at the south. Similarly, growth focussed at the Severnside settlement cluster is positive in transport terms given that the area is served by two train stations. Both stations are within close proximity of each other at Rogiet and Caldicot, leaving Magor at the far west of the cluster without any practical walking or cycling option for accessing either station. However while there are no existing sustainable transport links at Magor it is noted that bus links are possible, and that the new South Wales Metro plan designates Magor as a location for a rail station (Magor Walkway Station). Again, detailed conclusions are not possible in the absence of specific development sites, though the principle of directing growth here as opposed to locations with no public transport is clearly positive.
- 9.88 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the Preferred Strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the Preferred Strategy is unlikely to have a positive effect in relation to the majority of inter-settlement travel.
- 9.89 In 2018 the proportion of CO₂ emissions from road transport in Monmouthshire was 52% which is notably high in relation to the Wales average of 26%.¹⁶ This likely reflects the existing high rate of car dependency associated with the County's rurality and the distances between the

¹⁶ Department for Business, Energy & Industrial Strategy (2020), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018' [online], available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

main settlements. In the context of this high baseline for emissions, and on the understanding that the Preferred Strategy is delivering low growth in absolute terms, it is unlikely that the Preferred Strategy will facilitate modal shift of a significance which appreciably reduces emissions. However, the Sustainable Settlement Appraisal (2021) identifies that Abergavenny, Caldicot, Chepstow and Monmouth score most strongly in terms of sustainability, with transport and accessibility a key consideration. Therefore, as noted above, the principle of directing growth to the higher tier settlements performs positively in relation to the transport and movement theme.

- 9.90 The behavioural shift in people's commuting patterns throughout the Covid-19 pandemic is also recognised through the Preferred Strategy. It aims to build on the increased cycling and walking activity and working from home patterns, as highlighted through the Welsh Government's Building Better Places document. The Strategy seeks to maximise opportunities and further secure in the long-term this positive transport modal shift, kickstarted by the Covid-19 pandemic, from the car to active travel car-free journeys. Distributing growth based on the settlement hierarchy (Policy S2) is anticipated to lead to long term positive effects in this respect, enabling the delivery of sustainable and resilient communities.
- 9.91 Other strategic policies most likely to have an effect in relation to the transport and movement ISA theme are S3 (Sustainable Placemaking & High Quality Design), S6 (Infrastructure Provision), S10 (Sustainable Transport), S11 (Retail and Commercial Centres Hierarchy) and S13 (Employment Sites Provision).
- 9.92 Of these, Policy S10 (Sustainable Transport) is likely to have the most direct positive effects in relation to transport and movement. The policy establishes a presumption in favour of development which accords with the PPW's Sustainable Transport Hierarchy (see Figure 9.2 below). Where sites are available to support this approach, this will help embed sustainability and accessibility into new development by integrating walking and cycling and public transport access into the location, design and layout of new schemes. This principle is supported by other strands of the policy. Bullet point 3 says that development proposals should promote active travel through "*safeguarding, enhancing and expanding on the Active Travel Network*", whilst bullet points 5 and 6 state that development should help improve road safety and minimise the adverse effects of parking, both of which could play a role in incentivising and enabling more widespread take up of walking and cycling.
- 9.93 Although Policy S10 does not in itself form part of the spatial strategy, the final bullet point of the policy has spatial implications in that it identifies the potential for developing "*high capacity transport links*" at the three Tier 1 settlements. This reinforces the benefits of directing the majority of growth to Abergavenny, Chepstow and Monmouth.

Figure 9.2 The Sustainable Transport Hierarchy for Planning¹⁷

- 9.94 Policy S4 (Sustainable Placemaking & High Quality Design) recognises the importance of locating different facilities together in an accessible location to maximise the amount of services which can be accessed from public transport hubs and the Active Travel Network. In practice this would require new development to integrate effectively with the existing Active Travel Network and potentially enhance it depending on the size and location of the scheme within a settlement.
- 9.95 Policy S6 (Infrastructure Provision) includes 'broadband infrastructure' within its indicative list of planning obligations which may be sought through the development process. The supporting text of the policy also notes that the term 'infrastructure' has a broad definition which includes digital infrastructure and telecommunications. Supporting the delivery of high speed broadband can have substantial benefits in relation to transport as it can facilitate changing working practices to work more remotely. This is identified in Future Wales as a key area to facilitate the Covid-19 recovery, and, reduce the need to travel.

Summary appraisal of the Preferred Strategy

- 9.96 The Preferred Strategy gives great weight to the Active Travel Network and the importance of directing growth to locations which can either integrate with the existing network or enhance and extend the existing network in order to link with services and facilities. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is better access to sustainable transport modes and wider infrastructure. The distribution of growth also enables the Preferred Strategy to take advantage of the proposed South East Wales Metro rollout to Monmouth, Chepstow and Abergavenny, though full integration into the Metro network may not be implemented until later in the plan period. The Preferred Strategy looks to capitalise on Monmouthshire's strategic location within the Cardiff Capital Region, its strategic location between the Great Western Cities and SW/Bristol region, and its access to the M4, M48 and mainline rail corridors which is an important element in ensuring the plan area's continued integration into the Cardiff Capital Region and beyond.
- 9.97 Consideration is also given through the Preferred Strategy to Welsh Government's Building Better Places paper, and the role active travel and digital connectivity plays in the County's recovery from Covid-19, and opportunities presented to support effective sustainable travel habits.
- 9.98 Overall, the Preferred Strategy is predicted to have a significant long term positive effect on the transport and movement theme. At a strategic scale it takes advantage of opportunities arising from the Cardiff Capital Region City Deal and South East Wales Metro proposals, whilst at a

¹⁷ Welsh Government (2021), 'Planning Policy Wales: Edition 11' [online], available at: https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

settlement specific scale it provides for opportunities to enhance and extent the Active Travel Network and integrate new development into it.

Appraisal of cumulative effects

- 9.99 There is potential for both negative and positive cumulative effects in relation to transport and movement, particularly in relation to cross boundary roads and railways which stand to be impacted by development both within Monmouthshire and regionally.
- 9.100 Existing travel patterns in Monmouthshire reflect its rurality, particularly a trend for relatively long travel to work distances, high levels of car ownership and reliance on the private car. The volume of traffic in the County has also continued to increase, up nearly 10% in the seven years to 2017. The primary points of road congestion in the region are on the M4, with regular issues of congestion at Newport tunnels reflecting the high commuter levels to and from Cardiff in particular.¹⁸ The 2019 decision not to progress an M4 relief road¹⁹ circumventing the Newport tunnel bottleneck could have effects in-combination with growth at Monmouthshire, Newport and in the West of England resulting in additional congestion over time. This in turn could increase the duration of car and HGV journeys between south Monmouthshire, Newport and Cardiff. It is however recognised that the South East Wales Transport Commission Final Recommendation Plan (2020) sets out a number of recommendations to address the M4 congestion, which may reduce adverse effects in the long term.²⁰
- 9.101 The adopted Newport LDP (2015) safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road and the North South Link. Whilst these proposals will likely contribute to easing localised congestion issues, there could also be potential for increased traffic along the M4, A4042 and A449 as a result of growth within Newport.
- 9.102 Additionally, growth in the Heads of the Valleys, while likely to boost the regional economy, could lead to increased pressure on the road network, particularly the A465. However, it is noted that the A465 has recently undergone significant enhancement, including dualling of the carriageway in places, and capacity has therefore been boosted.
- 9.103 Cumulative effects in relation to public transport are projected to be largely positive, as future growth of the Cardiff City Region is underpinning the business case for the SE Metro rollout. This includes enhanced heavy rail connectivity between Cardiff and Abergavenny and Chepstow, and bus rapid transit between Cardiff and Monmouth. In the context of early uncertainties around the extent of the SE Wales Metro rollout, growth proposed in the neighbouring authorities within the Cardiff City Region contribute to this positive cumulative effect through the introduction of additional users of the network to create a robust business case for expansion.

Natural resources (air, land, minerals and water)

Appraisal of the Preferred Strategy

- 9.104 In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.²¹ The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Chepstow and Usk for NO₂.²² Policy S1 (Strategic Sustainable Growth) sets out the Preferred Strategy approach to distribute growth proportionately across the County, in-combination with the outcome of the Sustainable

¹⁸ Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at:

<https://www.monmouthshire.gov.uk/local-transport-plan/>

¹⁹ Welsh Government (2019) 'M4 corridor around Newport: decision letter' [online], available at: <https://gov.wales/m4-corridor-around-newport-decision-letter>

²⁰ Transport Commission (2020) Final recommendations [online] available at:

<https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf>

²¹ World Health Organisation (2019) Ambient air pollution: Health impacts <https://www.who.int/airpollution/ambient/health-impacts/en/>

²² Air Quality in Wales (2019) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

Settlement Appraisal (2021). The Appraisal established a sustainable settlement hierarchy that reflects those communities best placed to accommodate sustainable growth based on accessibility to sustainable transport, the availability of local services and the level of employment opportunities.

- 9.105 Delivering growth towards the most sustainable communities is likely to lead to positive effects in terms of supporting levels of self-containment in the higher tier settlements, reducing the need to travel where possible, and subsequently reducing levels of NO₂. However, directing growth in accordance with the settlement hierarchy includes delivering a large proportion of growth to Chepstow, given this is a Tier 1 Settlement. Policy 2 (Spatial Distribution of Development - Settlement Hierarchy) states that around 1,521 dwellings will be directed to Chepstow during the plan period, which has the potential to exacerbate NO₂ levels within the AQMA through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. Conversely, it is noted that Policy SP2 identifies Usk as a Settlement (along with Raglan and Penperlleni), with only 449 dwellings distributed between these settlements. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2016), and subsequently through the South East Wales Transport Commission Final Recommendations Plan: November 2020. This will inform the Deposit RLDP.^{23,24}
- 9.106 It is noted that the Preferred Strategy, through Policy S2, directs around 2,323 dwellings to the Severnside Area. Delivering growth to the South of the County has the potential to lead to positive effects through capitalising upon the strategic links to the Great Western Cities, Cardiff Capital Region, and SW/ Bristol region. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which may provide opportunity for building more sustainable communities and improved air quality in the South of the County.
- 9.107 It is considered that the programme outlined in the LTP (2016) will support sustainable communities across the County; including through the delivery of walking and cycling infrastructure, bus network improvements, station and highways improvements, Cardiff Capital Region Metro schemes, 20mph limits and road safety schemes. This coincides with higher level policy frameworks, and in accordance with Welsh Government guidance it does not contain specific rail service and trunk road proposals. The LTP programme is reflected through the Preferred Strategy policy framework, notably Strategic Policy S10 (Sustainable Transport) states that *“The Deposit Plan will safeguard sites necessary to deliver the key transport measures and schemes identified in the Updated Local Transport Plan.”* Policy S10 also sets out a list of specific facilitation tasks for development to promote sustainable, safe forms of travel including *“promoting electric vehicle charging infrastructure”*. This will contribute positively towards reducing atmospheric levels of NO₂ and improving air quality within the County.
- 9.108 The uptake of sustainable travel to improve air quality is further supported through Policy S6 (Infrastructure Provision) and Policy S3 (Sustainable Placemaking & High Quality Design); which requires development proposals to *“promote the co-location of uses maximising opportunities for active travel and public transport use”*.
- 9.109 Monmouthshire is a predominantly rural County and one of the key issues that has been identified through the RLDP (Issue 17) is that *‘...there is a significant high percentage of BMV agricultural land with limited Brownfield land development opportunities’*. Looking first at brownfield land supply, existing brownfield opportunities in the Tier 1 Settlements are capitalised upon through the Preferred Strategy, although it is noted that these are limited. In line with Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), the majority of growth is being directed to the Tier 1 Settlements, with the intention of utilising brownfield land where possible. This will contribute positively towards meeting the ISA objective to *“...maximise opportunities for development on previously developed land”*.

²³ Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

²⁴ South East Wales Transport Commission (2020) South East Wales Transport Commission: Final Recommendations Plan [online] available at: <https://gov.wales/south-east-wales-transport-commission-final-recommendations>

9.110 As highlighted earlier within this Chapter, no specific sites/ allocations are identified at this stage, and it is therefore difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the specific loss of greenfield land. However, given the level of growth proposed and the lack of brownfield supply across the County, a significant proportion of development is therefore likely to be delivered on greenfield land, leading to residual negative effects against this ISA theme. While the focus on re-use/ redevelopment of brownfield sites in the Tier 1 Settlements will support the delivery of positive effects in this respect, there is anticipated to be a net loss of greenfield land overall.

9.111 In terms of agricultural land quality throughout Monmouthshire, it is recognised that there is a high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988). This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:

- Primary Settlements are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high quality Grade 2 land and non-agricultural land are present around Chepstow.
- Secondary Settlements include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east/ and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- Severnside is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor/ Undy, and north of Sudbrook.
- Rural settlements have not yet been defined; however, it is recognised that outside of the main settlements there is a significant amount of BMV agricultural land, reflecting the rural nature of the County.

9.112 In terms of the Preferred Strategy, it is considered that directing a significant proportion of growth to the Tier 1 settlements (Strategic Policy S2) will protect best and most versatile agricultural land where possible. This is in accordance with PPW 11, which states that *"agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future."*²⁵ However, as set out in the RLDP, the widespread distribution of BMV agricultural land (surrounding all settlements to some extent) means that development anywhere in the County will likely lead to residual adverse effects.

9.113 As discussed above, no specific sites/ allocations are identified at this stage, and it is therefore difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the specific loss of BMV agricultural land. It is however noted that the RLDP states that *"a key consideration in assessing the Candidate Sites will be the high percentage of BMV agricultural land within Monmouthshire."* An agricultural land classification Background Paper will be produced at the Deposit RLDP stage, adopting a sequential approach to assessing loss of BMV agricultural land as set out by PPW. Every effort will be made to, where possible, protect the higher grades of BMV land; and to avoid/ or minimise the loss of BMV land. This will contribute positively towards meeting the ISA objective to *"promote the efficient use of land"*. As set out in the beginning of this Chapter, consideration will be given to the Candidate Sites in due course.

9.114 While there is no specific policy which relates to the use of previously developed land and protection of best and most versatile agricultural land, it is considered that this will be reflected through site specific policies, and is adequately addressed though PPW (2021).

²⁵ Welsh Government (2018) Planning Policy Wales Edition 10 para. 3.45
<https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

- 9.115 In terms of the County's mineral resource, the latest South Wales Regional Aggregates Working Party (SWRAWP) Annual Report (2018) establishes that at the end of 2018 Monmouthshire had a greater than 50 year's supply of crushed rock reserves, which are situated at the inactive limestone quarry at Ifton Quarry, Rogiet.²⁶ In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within the RLDP. A revised Regional Technical Statement (RTS) - 2nd Review was published in 2020. The 2nd Review (RTS2) makes recommendations for the apportionments necessary to ensure an adequate supply of crushed rock, including the nationally recommended minimum provision of 7 and 10 years, are available for the entire duration of the RLDP. The total apportionments required for Monmouthshire are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as of 31st December 2016). Reflecting the significant unworked permitted reserves of Limestone at the inactive quarry at Ifton. When compared against the apportioned requirement as set out in the RTS2, Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP when determined on a Local Planning Authority basis.
- 9.116 Whilst it is considered that there would be no negative impact on Monmouthshire's mineral resource through the Preferred Strategy as mineral landbank obligations can be met, the Preferred Strategy does have the potential to impact upon the Limestone Mineral Safeguarding Area (MSA) present in parts of the south of the County.²⁷ Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) directs around 2,323 dwellings towards the Severnside area in the south of the County. The Council will therefore need to be mindful of the potential effect that development could have on the MSA. While no specific sites/allocations are identified within the Preferred Strategy at this stage, it is considered that in accordance with national and regional policy requirements, a sustainable approach to minerals planning will be adopted. In this context, Policy S17 (Minerals) states that the Council will *"safeguard known / potential sand and gravel and limestone resources for future possible use"* in addition to *"maintaining a minimum 10 year land bank of crushed rock and 7 years land-based sand and gravel reserves throughout the plan period in line with national guidance"*.
- 9.117 Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The total demand for water for this WRZ is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.
- 9.118 Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

²⁶ South Wales Regional Aggregates Working Party (2019) Annual Report 2018 <http://www.swrawp-wales.org.uk/Html/SWRAWP%20Annual%20Report%202017%20FINAL.pdf>

²⁷ North Wales and South Wales Regional Aggregates Working Parties (2014) Regional Technical Statement - 1st Review <https://www.merthyr.gov.uk/media/4451/sd44-south-wales-regional-aggregates-working-party-regional-technical-statement-1st-review-august-2014.pdf>

9.119 Given the legal requirements in place for WRMPs, the Preferred Strategy is anticipated to deliver neutral effects in terms of impact on water resources. In accordance with PPW (2021) development coming forward through the Preferred Strategy will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. PPW (2021) states that *“New development should be located and implemented with sustainable provision of water services in mind, using design approaches and techniques which improve water efficiency and minimise adverse impacts on water resources, including the ecology of rivers, wetlands and groundwater and thereby contributing towards ecological resilience”* This is reinforced through Preferred Strategy Policy S4 (Climate Change) which requires all development proposals to *“Incorporate water efficiency measures and minimise adverse impacts on water resources and quality”*. This will contribute positively towards meeting the ISA objective to *“promote the efficient use of natural resources including providing increased opportunities for water efficiency.”*

Summary appraisal of the Preferred Strategy

9.120 The Preferred Strategy, in accordance with the LTP (2016) and South East Wales Transport Commission Final Recommendations Plan: November 2020, seeks to minimise the need to travel, particularly by the private motor car, and capitalise upon opportunities to incorporate active travel modes and routes, directing development to the most sustainable locations which serve to achieve this. Enhanced sustainable transport opportunities such as active travel networks, improved public transport and electric charging point infrastructure will help to reduce the impact of transport-based emissions, deliver improvements in air quality, and provide benefits in the County's recovery from Covid-19. However, given the rural nature of the County and existing reliance on the car for travel, there is the potential for residual adverse effects.

9.121 Where possible, the RLDP will prioritise the re-use/ redevelopment of brownfield land, although it is recognised that such opportunities are limited in Monmouthshire. The Preferred Strategy seeks to protect BMV land and minimise its loss as far as possible through the Preferred Strategy; undertaking a sequential approach to the allocation of candidate sites. However, given the widespread nature of high quality ALC throughout the County, it is considered that the significant loss of soil resource is inevitable.

9.122 In terms of mineral and water resources, it is considered that neutral effects are anticipated given there are no existing capacity issues, and the higher level policy frameworks in place respectively.

9.123 While there is a need to conserve natural resources, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. It is likely that the Preferred Strategy will have a long term negative effect on natural resources through the loss of greenfield and agricultural land; however, it is not possible to conclude it will be significant at this stage. The precise location of development is not currently known and will influence the significance of residual effects.

Appraisal of cumulative effects

9.124 There is the potential for a cumulative loss of greenfield land and BMV agricultural land as a result of the distribution of housing to meet the need of the wider South Wales region. Development proposed through the Preferred Strategy has the potential to interact with development proposed through neighbouring authority plans to result in cumulative significant loss of greenfield land and BMV agricultural land.

9.125 The County has regional obligations to be met in terms of Minerals planning, forming part of the former Gwent sub-region along with Torfaen, Newport and Blaenau Gwent. However when compared against the apportioned requirement as set out in the RTS2, (2020), Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP.

9.126 There is the potential for development proposed through the Preferred Strategy to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. Water resources and wastewater treatment

capacity are generally managed at a catchment level and there is close working between Natural Resources Wales, Welsh Water, and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the total demand for water in the County is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050, it is considered that the Preferred Strategy will not have a significant negative cumulative effect on this ISA theme.

Biodiversity and geodiversity

Appraisal of the Preferred Strategy

9.127 In terms of European sites, the HRA Report (June 2021) for the Preferred Strategy identified the following impact pathways as being relevant for the emerging RLDP:

- Atmospheric pollution (due to an increase in traffic generation);
- Recreational pressure (due to the local population growth);
- Loss of functionally linked land (due to the allocation of greenfield sites for development);
- Water quality (due to increases in sewage effluent and industrial pollutant input, and the emerging issue of nutrient neutrality); and
- Water quantity, level and flow (due to an increased abstraction of water for dwellings and employment space).

9.128 The screening of the Preferred Strategy policies found that the following European sites within 15km of Monmouthshire and impact pathways need to be considered in more detail through the Appropriate Assessment stage:

- Usk Bat Sites SAC (atmospheric pollution, recreation and loss of functionally linked land);
- Cwm Clydach Woodlands SAC (atmospheric pollution);
- Wye Valley Woodlands SAC (atmospheric pollution);
- Severn Estuary SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow);
- Severn Estuary SPA / Ramsar (atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow);
- River Wye SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow);
- Avon Gorge Woodlands SAC (atmospheric pollution);
- River Usk SAC (recreation, water quality and water quantity, level and flow); and
- Wye Valley and Forest of Dean bat Sites SAC (loss of functionally linked land).

9.129 It should be noted that all of the potential strategic growth areas were also identified as needing to be screened in for further detailed consideration through the HRA process.

9.130 The HRA Report found that due to the relatively limited detail available in the Preferred Strategy (e.g. no site allocations and only some policy wording is available) and the lack of key evidence (e.g. no air quality assessment), it was not possible to undertake a fully conclusive Appropriate Assessment at this stage. However, given that some detailed policy wording is already available, the HRA undertook preliminary Appropriate Assessment of some impact pathways and provides initial recommendations on how to mitigate potential adverse effects of the RLDP on European sites through additional policy wording. It also identifies further work to be carried out once the precise location of growth is known, which includes air quality modelling and visitor surveys (at two key access points).

- 9.131 The emerging issue of nutrient (phosphate) neutrality in the River Wye SAC and River Usk SAC was also addressed in the HRA. Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. AECOM calculated the phosphorus budgets of the potential sites coming forward in the Strategic Growth Areas of Abergavenny and Monmouth. All appraised sites show a phosphorus surplus as they are served by WwTWs discharging into the upper reaches of both SACs. The Chepstow and Severnside SGAs are served by Nash WwTW in Newport, which discharges into the Severn Estuary and therefore will not contribute phosphorus to the R. Wye and R. Usk. A package of mitigation measures will therefore be required to support development coming forward under the Deposit Plan within Abergavenny and Monmouth. A complete Appropriate Assessment of the nutrient neutrality issue will be provided alongside and inform the Deposit Plan HRA, including detailed revised calculations of the phosphate budget and offsetting / mitigation approaches.
- 9.132 Taking the findings of the HRA Report into account at this stage, it is considered that the likelihood for significant effects on European sites as a result of development proposed through the Preferred Strategy is uncertain. The findings of any future HRA work will inform the next iteration of the ISA Report to accompany the Deposit Plan on consultation.
- 9.133 As explained earlier in this Chapter, the majority of growth during the plan period is being directed towards the main settlements in the County, which includes Abergavenny, Chepstow and Monmouth.
- 9.134 There is a range of nationally and locally designated biodiversity located around these settlements. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests.
- 9.135 The level of development proposed and directed to these areas under Policies S1 and S2 has the potential to result in impacts on the designated sites and wider biodiversity around these settlements. Policy S6 (Delivery of Homes) reiterates the level of housing growth to be delivered during the plan period and set out in Policy S1.
- 9.136 Policy S8 proposes that the strategic development sites will contribute to the delivery of the housing and job growth set out in Policy S1. All the strategic growth options identified at this stage have been considered through the ISA process, with summary findings presented in Chapter 6 and detailed appraisals presented in **Appendix II**.
- 9.137 There are a number of other policies that support or permit a type of development that could have impacts on designated or wider biodiversity interests but that do not specify a quantum or any sites/ locations. These include Policies S4 (Climate Change), S5 (Infrastructure Provision), S9 (Gypsy and Travellers), S12 (Community and Recreation Facilities), S13 (Employment Site Provision), S14 (Rural Enterprise) and S15 (Visitor Economy).
- 9.138 There are also a number of policies that seek to protect or enhance the natural environment and will help to mitigate the impacts of proposed development on biodiversity. Policy S3 (Sustainable Placemaking & High Quality Design) states that development should “*promote a Green Infrastructure led approach and protect and enhance the natural environment*”. Policy S4 (Climate Change) requires development proposals to promote the provision of ultra-low emission vehicle charging infrastructure which will help to encourage their use and therefore indirectly have positive effects on biodiversity by helping to reduce emissions and improve air quality.
- 9.139 The Preferred Strategy states through Policy S5 (Infrastructure Provision) that planning obligations may be sought to secure improvements in infrastructure where necessary and that such obligations may include green infrastructure and ecological mitigation and enhancement. Policy S14 (Rural Enterprise) permits development outside settlement development boundaries to rural enterprise uses and the diversification of the rural economy, “*where it is of a scale and*

type compatible with the surrounding area and will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value".

- 9.140 Strategic Policy S18 (Green Infrastructure, Landscape and Nature Conservation) requires development to, "Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape and biodiversity assets", through five key functions. This includes *"by protecting, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them"*. There is also a key function relating to greenspace provision that states that Green Infrastructure assets and opportunities are designed to deliver a multifunctional resource.

Summary appraisal of the Preferred Strategy

- 9.141 As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the biodiversity and geodiversity theme/ ISA objectives as a result of development proposed in the Preferred Strategy. However, in light of the emerging issue regarding nutrient loading in the River Wye and Usk SACs, AECOM (2021), undertook preliminary phosphorus calculations for the Strategic Growth Areas (SGAs) of Abergavenny and Monmouth. This found that potential residential or employment sites in these SGAs are likely to have nutrient neutrality implications because they are served by WWTWs discharging into the upper reaches of both SACs.
- 9.142 Monmouthshire's main settlements are further constrained by other sensitive receptors, as identified through the HRA (2021), in close proximity to the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these receptors as well as a number that are located further away through various impact pathways. These sensitive receptors will need to be taken into account through the Council's candidate site appraisal process and inform the allocation of sites in the Deposit Plan.
- 9.143 The Preferred Strategy includes policies that seek to protect and where possible enhance the natural environment and seek to mitigate the impacts of proposed development on biodiversity and geodiversity. Notably, it is recognised that Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of the River Wye and River Usk SACs (i.e. Abergavenny and Monmouth) will have to be phosphorus neutral and supported by nutrient budgets. AECOM's preliminary work (2021) indicates that a package of mitigation measures will be required to support development coming forward under the Deposit Plan. The phosphorus budget will be recalculated when the final site allocations are available for assessment and more detailed recommendations on mitigation provided.
- 9.144 Taking the above into account, an uncertain effect is identified at this stage. The nature and significance of effects are dependent on the precise location and scale of growth.

Appraisal of cumulative effects

- 9.145 Development proposed through the Preferred Strategy has the potential to interact with and have cumulative effects on biodiversity with growth proposed in other areas outside the County. This includes development plans in surrounding LAs, such as Torfaen, Newport, Brecon Beacons National Park, Forest of Dean and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance biodiversity.
- 9.146 Further HRA work will be carried out to address the likelihood for adverse effects on the integrity of any European designated sites as a result of development proposed through the RLDP acting in-combination with other plans and projects. The candidate site assessment process will consider the impacts of development at specific sites on biodiversity and this issue will also be considered further through the ISA process.
- 9.147 It will be important for Local Planning Authorities and stakeholders, such as NRW and Natural England, to work closely to identify potential cross-boundary issues and seek to protect and

enhance ecological corridors that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver biodiversity net gain should be explored.

Historic environment

Appraisal of the Preferred Strategy

- 9.149 As explained earlier in this Chapter, the majority of growth during the plan period is being directed towards the main settlements in the County, which includes Abergavenny, Chepstow and Monmouth. There is a range of nationally designated heritage assets located within and around these settlements. Furthermore, the Blaenavon Industrial Landscape World Heritage Site is located to the south west of Abergavenny.
- 9.150 The level of development proposed and directed to these settlements under Policies S1 and S2 has the potential to result in impacts on the designated heritage assets and wider historic environment within and surrounding these settlements. Policy S6 (Delivery of Homes) reiterates the level of housing growth to be delivered during the plan period as set out in Policy S1.
- 9.151 Given the lack of brownfield sites it is likely that growth will be delivered on greenfield sites, in some cases through large urban extensions at the edge of these settlements. Policy S8 (Strategic Development Sites) proposes that the strategic development sites will contribute to the delivery of the housing and jobs growth set out in Policy S1. All the strategic growth options identified at this stage have been considered through the ISA process, with summary findings presented in Chapter 6 and detailed appraisals presented in **Appendix II**.
- 9.152 There are also designated heritage assets within and in close proximity to the lower tier settlements where development is proposed. This along with development in the rural areas could have impacts on the historic environment; however, given the scale of growth this is unlikely to be significant. Proposed development at the smaller settlements and in the rural areas may also have impacts on the historic environment but this is uncertain at this stage as the precise location of growth is not known.
- 9.153 There are a number of other policies that support or permit a type of development that could have impacts on the historic environment but that do not specify a quantum or any sites/locations. These include Policies S4 (Climate Change), S5 (Infrastructure Provision), S9 (Gypsy and Travellers), S12 (Community and Recreation Facilities), S13 (Employment Site Provision), S14 (Rural Enterprise) and S15 (Visitor Economy).
- 9.154 In terms of the future well-being of the Welsh language the Preferred Strategy is not likely to have any direct significant effects. This is dependent on a range of factors beyond the planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The Preferred Strategy will deliver new homes and employment opportunities as well as associated infrastructure improvements. As most growth is directed to the principal settlement areas, effectively integrated new housing and employment development can support cultural vitality and inclusive communities. This is likely to have a long term indirect positive effect on the future of the Welsh language; however, this is unlikely to be significant.
- 9.155 The Preferred Strategy includes policies that will help to reduce the impact of proposed development on the historic environment. This includes Strategic Policy S3 (Sustainable Placemaking & High Quality Design) which requires development to “*contribute to creating high quality, attractive and sustainable places that support the well-being of the community*”. To achieve this development should, “*protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places*”.
- 9.156 Strategic Policy S18 (Green Infrastructure, Landscape and Nature Conservation) states that development proposals must, “*Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscape and biodiversity assets*” through “*Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character*”.

Summary appraisal of the Preferred Strategy

- 9.157 As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment theme/ ISA objectives as a result of development proposed in the Preferred Strategy. There are a number of designated heritage assets within and surrounding the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these sensitive receptors, including their setting. The historic environment, including designated heritage assets, will need to be taken into account through the Council's candidate site appraisal process and inform the allocation of sites in the Deposit Plan.
- 9.158 The Preferred Strategy includes policies that seek to protect and where possible enhance the landscape and historic environment. Taking the above into account, an uncertain effect is identified at this stage. The nature and significance of effects are dependent on the precise location and scale of growth.

Appraisal of cumulative effects

- 9.159 Development proposed through the Preferred Strategy has the potential to interact with development proposed through other plans to have a cumulative effect on the historic environment. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Blaenavon Industrial Landscape World Heritage Site (WHS), as well as historic town centres.
- 9.160 The WHS lies across the County Boundary and also forms part of the County Borough of Torfaen. The south-western boundary of the WHS runs parallel with the boundary of Torfaen/ Blaenau Gwent County Borough's also. Growth proposed through the Preferred Strategy alongside growth proposed through the emerging spatial strategies for the Torfaen and Blaenau Gwent Local Plans has the potential to cumulatively affect the sensitive historic site and its setting. It is recognised however, that all of the Local Development Plans will include policies which seek to protect and enhance the historic environment.
- 9.161 The WHS Management Plan seeks to "*deliver well-being benefits through heritage management and heritage-led regeneration*". The document identifies that Blaenavon has enjoyed successful heritage-led urban and environmental regeneration which has benefitted the historic landscape delivering substantial improvements and promoting continued inward investment. In this respect, growth around the WHS has the potential to support regeneration and townscape improvements that continue to protect and enhance the designated area and the wider setting.
- 9.162 It will be important for Local Planning Authorities and stakeholders, such as Cadw, to work closely to identify potential cross-boundary issues and seek to protect and enhance heritage settings that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver heritage-led regeneration, in line with the WHS Management Plan, should be explored.

Landscape

Appraisal of the Preferred Strategy

9.163 Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County includes:

- **Wye Valley AONB** located to the east of Monmouthshire. The part of the Wye Valley AONB located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.
- **Brecon Beacons National Park** located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.

9.164 In line with Planning Policy Wales (2021) it is recognised that the Wye Valley AONB and Brecon Beacons National Park are “*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.*” In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to “Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”. Notably, Objective WV-D2 seeks to “encourage and support high standards of design, materials, energy efficiency, drainage and landscaping in all developments”.²⁸ In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development control functions in the correlating part of the County. The LDP “represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park.”²⁹ Additionally, the Brecon Beacons National Park Management Plan (2015) sets out under six Themes, policies and priorities for managing change in the National Park.³⁰ Notably, Theme five (Building and Maintaining Sustainable Communities, Towns and Villages) considers the environmental capacity approach to spatial development demonstrated in the LDP.

9.165 While protection is provided at the higher level, it is nonetheless considered that development proposed through the Preferred Strategy has the potential to adversely impact upon special landscape features, character, and setting.

9.166 Strategic Policy S1 (Strategic Sustainable and Resilient Growth) states that the LDP will make provision for 8,366 homes over the plan period. However, as explained earlier in this Chapter, the residual housing requirement during the plan period is less than this once existing commitments have been taking into account.

9.167 The Preferred Strategy seeks to distribute growth across the County in a manner that reflects and addresses the aims of the overarching Sustainable and Resilient Communities Growth Strategy. It will distribute growth across Primary Settlements, Secondary Settlements, Severnside and those Rural Settlements identified as having capacity for growth and/or in need of development to sustain them, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. As explained earlier in this Chapter, the Preferred Strategy (Strategic Policies 1-3) remains high level, and while indicative strategic growth areas are set out in the main towns of Abergavenny, Chepstow, Monmouth, and the Severnside area; no specific sites/ allocations are identified at this stage. It is therefore difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the Landscape theme/ ISA objectives. However, it is possible to highlight where sensitive receptors are located in relation to the development being

²⁸ Wye Valley AONB Joint Advisory Committee (2016) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2015 – 2020 <http://www.wyevalleyaonb.org.uk/index.php/publications/>

²⁹ Brecon Beacons National Park Authority (2019) Brecon Beacons National Park Local Development Plan (2018 – 2033) Preferred Strategy Consultation Document <https://www.beacons-npa.gov.uk/planning/draft-strategy-and-policy/local-development-plan-review/preferred-strategy/>

³⁰ Brecon Beacons National Park (2020) A Management Plan for the Brecon Beacons National Park 2015-2020 <https://www.beacons-npa.gov.uk/wp-content/uploads/BBNP-Management-Plan-PROOF-03-03-16-English.pdf>

proposed through the Preferred Strategy and suggest potential avoidance or mitigation to reduce the likelihood for adverse effects.

- 9.168 In accordance with Strategic Policy S2 (Spatial Distribution of Development) around 1,893 homes will be directed to Abergavenny which is located adjacent to the National Park; and 1,521 and 1,418 dwellings directed to Chepstow and Monmouth respectively, which are located in close proximity to the AONB. As a result, focussing a significant proportion of development in the Primary Settlements through the Preferred Strategy, has the potential to increase pressure on landscape character, setting, and the intrinsic qualities of the AONB and National Park.
- 9.169 Consideration is also given to the impact of the Preferred Strategy on the wider valued landscape; recognising that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 landscapes of outstanding or special historic interest in Wales. Notably there are four located within Monmouthshire. These mainly relate to the AONB along the east of the County, along the Severn Estuary to the south, and to the west coinciding with the Brecon Beacons National Park.
- 9.170 While the exact location of sites is currently unknown, it is nonetheless considered that directing a significant proportion of growth towards important designated landscapes will ultimately change the landscape setting of these assets to some degree, with both positive and negative effects anticipated. Negative effects are ultimately anticipated due to a loss of greenfield and agricultural land affecting local landscape character, with development also considered likely to affect views from the AONB given the rural nature and topography of the County. Further potential negative effects and potential positive effects are dependent upon the delivery of high-quality design and efficient layout and orientation - these aspects remain uncertain until site proposals are assessed, and are largely guided by policy.
- 9.171 To this effect, Policy S3 (Sustainable Placemaking & High Quality Design) requires that *“development shall contribute to creating high quality, attractive and sustainable places that support the well-being of the community.”* In order to achieve this, in line with Policy S4, all development should:
- iii. *“Promote a Green Infrastructure led approach that respects local distinctiveness and the character of the site and its surroundings; and*
 - iv. *Protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places.”*
- 9.172 PPW places the delivery of sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly at the heart of the Plan and notes it as the optimal outcome of development plans. Notably, PPW 11 defines Green Infrastructure as *“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places”*.³¹ The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW, recognising the multi-functional role it has in delivering the goals and objectives of the Future Generation and Wellbeing Act.³²
- 9.173 The Preferred Strategy supports a green infrastructure led approach to the design of new development that will enhance the character and identity of Monmouthshire’s settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. It is however recognised that the achievement of this will depend largely upon identifying and understanding the local characteristics which are distinctive to an area. To ensure this is delivered, Policy S18 (Green Infrastructure, Landscape and Nature Conservation) requires that development proposals *“Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscape and biodiversity assets through the following key functions:*

³¹ Welsh Government (2021) Planning Policy Wales Edition 11 para. 6.2.1
https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

³² Well-being of Future Generations (Wales) Act (2015)

- i. *Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;*
- iii. *Greenspace Provision, Connectivity and Enjoyment by ensuring that Green Infrastructure assets and opportunities embrace the placemaking approach and are designed and managed to deliver a multifunctional resource; capable of delivering a wide range of social, economic, environmental and health and well-being benefits for local communities and the county as a whole”.*

9.174 This will contribute positively towards meeting the RLDP objective to “*protect, enhance and manage Monmouthshire’s natural environment. This includes, the Wye Valley AONB, the County’s other high quality and distinctive landscapes, along with the connectivity between them by creating new linkages for them to adapt while at the same time maximising benefits for the economy, tourism, health and well-being.*” In this context, in accordance with Strategic Policy S5 (Infrastructure Provision) development may be required to include “*Recreation and Leisure Facilities including formal and informal open space*”, and/ or “*Green Infrastructure*” alongside development, to make development acceptable. Policy S5 further identifies that “*without appropriate investment to enable the provision of improved or new infrastructure, the proposed level of growth will be neither sustainable nor acceptable.*”

9.175 Overall, given Monmouthshire’s rural nature and the landscape assets present, it is considered that the delivery of the Preferred Strategy is predicted to lead to long term negative effects as a result of the introduction of development in previously undeveloped areas; despite the specific location of development being currently unknown. It is however noted that Preferred Strategy policies seek to ensure that development, where possible, retains and enhances distinctive landscape features, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects of growth across the County. Residual minor negative effects are therefore predicted against the Landscape ISA theme.

Summary appraisal of the Preferred Strategy

9.176 The Preferred Strategy proposes the delivery of new employment land and homes to meet identified need and provide flexibility throughout the plan period. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements given the findings of the Sustainable Settlement Appraisal (2021). However, these locations (notably Abergavenny, Chepstow and Monmouth) are constrained in terms of proximity to nationally designated landscapes; the Wye Valley AONB and Brecon Beacons National Park.

9.177 Preferred Strategy policies seek to ensure that development retains and enhances the key landscape areas, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects of the required growth. Notably, Strategic Policy S4 ensures that new development incorporates the principles of sustainable place-making and good design.

9.178 While there is the potential for the Preferred Strategy to have a negative effect on the landscape, it is not possible to conclude it will be significant at this stage. The precise location and scale of development at sites is not currently known and will influence the significance of residual effects.

Appraisal of cumulative effects

9.179 Development proposed through the Preferred Strategy has the potential to interact with and have cumulative effects on landscape with growth proposed in other areas outside the County. This includes development plans in surrounding LAs, such as Torfaen, Newport, Brecon Beacons National Park, Forest of Dean and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance the landscape.

- 9.180 Development proposed through the Preferred Strategy has the potential to interact with development proposed through these other plans to have a cumulative effect on the landscape. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Wye Valley AONB and Brecon Beacons National Park, given their importance nationally.
- 9.181 When considering cumulative effects of development on the AONB, consideration should be given to the protections provided by the adopted Wye Valley AONB Management Plan (2016), and Draft Management Plan (2021). In addition to national policy requirements, the AONB Management Plan sets out Strategic Development Objectives, which aim to “*Ensure all development within the AONB and its setting is compatible with the aims of AONB designation*”.
- 9.182 In terms of the National Park, the Brecon Beacons National Park Local Plan was adopted in 2013 and no significant growth is proposed during the plan period or in close proximity to the Torfaen, Blaenau Gwent or Monmouthshire administrative boundary. A review of the LDP is currently being carried out and a Preferred Strategy Document was published for consultation in July 2019. The level of growth proposed in the Preferred Strategy document (approx 1,500 dwellings) and where it is being focussed (primarily at Brecon, Crickhowell, Hay-on-Wye and Talgarth) during the plan period is not likely to result in any significant interactions with development being proposed or likely to come forward through the RLDP. However it is noted that the Covid-19 pandemic delayed the production of the Deposit Plan in 2020, and instead an additional stage of stakeholder engagement has been set out to enable the Authority to collaboratively reassess and rework the Preferred Strategy in light of shifting policy.³³
- 9.183 When considering cumulative effects of development on the BBNP, consideration should be given to the protections provided by the BBNP Management Plan (2015) and issues and objectives of the emerging Management Plan (2021).³⁴ In addition to national policy requirements, the Management Plan sets out under six Themes, policies and priorities for managing change in the National Park.³⁵ Notably, Theme five (Building and Maintaining Sustainable Communities, Towns and Villages) considers the environmental capacity approach to spatial development demonstrated in the LDP.
- 9.184 Ultimately the nature and significance of effects will be dependent on the precise location as well as design/ layout of development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural Resources Wales/ Natural England and the Wye Valley AONB Partnership, to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

Climate change

Appraisal of the Preferred Strategy

- 9.185 The Climate Change ISA objectives are to both mitigate and adapt to the effects of climate change through increasing energy efficiency and using low carbon and renewable energy sources where possible. Adapting to the effects of climate change includes the need to adapt to increased flood risk, whilst a key focus of mitigating climate change is the need to reduce CO₂ emissions from the built environment.
- 9.186 The distribution of growth proposed by the Preferred Strategy has potential to perform either positively or negatively in relation to climate change adaptation as the strategy is not supported by a bottom-up understanding of specific sites. This means that detailed conclusions are challenging as flood risk varies within settlements. For example, the Preferred Strategy directs 1,893 dwellings to Abergavenny but does not propose specific sites at which to deliver them. Abergavenny has substantial areas of Flood Zone C2, i.e. the area at greatest risk of fluvial

³³ Brecon Beacon National Park Authority (2020) Planning for the Brecon Beacons post Covid-19 recovery [online] available at: <https://www.beacons-npa.gov.uk/wp-content/uploads/Revised-Delivery-Agreement-for-consultation.pdf>

³⁴ Brecon Beacons National Park (2021) National Park Management Plan 2021 Issues, Vision and Objectives [online] available at: <https://www.beacons-npa.gov.uk/wp-content/uploads/NPMP21-Vision-and-Objectives-links-working.pdf>

³⁵ Brecon Beacons National Park (2020) A Management Plan for the Brecon Beacons National Park 2015-2020 <https://www.beacons-npa.gov.uk/wp-content/uploads/BBNP-Management-Plan-PROOF-03-03-16-English.pdf>

flooding. Therefore, effects in relation to climate change adaptation will be heavily dependent on which sites are proposed for allocation. However, it is recognised that the proposed Strategic Growth Areas at Abergavenny are all outside the areas of C2 fluvial flood risk and that higher tier policy is likely to ensure that areas of high flood risk are avoided through the development process.

- 9.187 In terms of climate change mitigation, the Preferred Strategy has a mixed performance. There could be potential to support growth with some potential to reduce greenhouse gas emissions by focusing growth at the higher tier settlements with existing transport links. By directing of the majority of growth to the Tier 1 settlements the strategy ensures that new development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Newport, Bristol and the Wider SW Region. Similarly, new employment growth in the Tier 1 settlements will be accessible by train or, in the case of Monmouth, by bus. However, in the absence of specific sites underpinning the strategy it is challenging to draw detailed conclusions in terms of improving access to specific jobs and services opportunities, though the principle of directing growth to such areas as opposed to locations with no public transport is clearly positive.
- 9.188 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the Preferred Strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the Preferred Strategy is unlikely to have a positive effect in terms of climate change mitigation in relation to the majority of inter-settlement travel.
- 9.189 The trend of increased home and remote working in light of the Covid-19 pandemic is anticipated to continue over the longer term. In accordance with Welsh Government's ambition of 30% of people working from or near home, the Preferred Strategy supports new development where it meets infrastructure requirements, including broadband provision. This, amongst other requirements, will contribute positively towards reducing out-commuting and supporting the Council's climate change objectives by reducing the overall need to travel.
- 9.190 In 2018 the proportion of CO₂ emissions in Monmouthshire from the built environment, i.e. from both domestic and industrial/commercial sources, was 50% which is notably low in relation to the Wales average of 74%. However, this is likely to simply reflect that the County has a higher than average proportion of emissions from transport sources, rather than reflecting low built environment emissions per se. On the understanding that the Preferred Strategy is delivering relatively low growth in absolute terms, it is unlikely that it will facilitate significant opportunities for delivering low carbon energy production, such as combined heat and power (CHP) schemes. It is considered unlikely that the distribution of growth through the Preferred Strategy will appreciably reduce emissions from the built environment.
- 9.191 Policy S5 (Climate Change) could lead to positive effects in relation to climate change adaptation and climate change mitigation. The policy has a strong emphasis on the need to embed low carbon concepts into development, saying that all development proposals will be required to *"reduce energy demand and promote energy efficiency"*, *"utilise sustainable construction techniques and local supplies"* and *"promote the provision of ultra-low emission vehicle charging infrastructure to reduce emissions"*. The policy also requires all development to avoid *"areas at risk of flooding"* and to incorporate *"measures such as Sustainable Urban Drainage Systems"*. Collectively this is considered likely to result in minor positive effect in relation to the climate change ISA theme.

Summary appraisal of the Preferred Strategy

- 9.192 All of the Tier 1 settlements have an element of fluvial and surface water flood risk by virtue of their riverside locations. Abergavenny is located on the River Usk, while Monmouth and Chepstow are located on the River Wye. In this sense, focussing the majority of growth at

these settlements could lead to development in areas of risk; however, without specific sites it is challenging to draw detailed conclusions in this regard. Despite this, it is important to draw attention to the fact that higher tier planning policy and guidance via PPW and Technical Advice Note 15 requires development to be directed away from the highest risk areas. Additionally, none of the Strategic Growth Areas fall primarily within Flood Zone C, the highest area of risk. In this context it is reasonable to conclude the Preferred Strategy will likely direct growth towards low risk sites, particularly in the context of Policy S5 (Climate Change) which echoes higher-tier requirements to avoid areas of flood risk. Neutral effects are therefore anticipated in relation to climate change adaptation.

- 9.193 The distribution of growth to the higher tier settlements could theoretically maximise the potential to seek strategic scale opportunities for delivering innovative renewable energy generation, such as combined heat and power (CHP). However, the overall quantum of growth proposed is relatively low in absolute terms and it is not clear whether there will be meaningful opportunities to seek such schemes in practice. This will likely become clearer once a more definitive position is known in relation to the Strategic Growth Areas and specific site allocations. Uncertain effects are anticipated in relation to climate change mitigation at this stage.

Appraisal of cumulative effects

- 9.194 In terms of climate change adaptation there does not appear to be notable potential for negative cumulative effects from development in Monmouthshire in combination with development in neighbouring plan areas. Although significant areas of fluvial flood risk permeate the County, in alignment with the major watercourses which flow to the Severn estuary to the south, there is a presumption in the PPW against development in Flood Zone C2, the highest risk zone. This is augmented by Technical Advice Note 15 (TAN15) which emphasises that “*plan allocations should not be made*” in Flood Zone C2. This will help ensure that development in Monmouthshire will be part of a regional and national picture of development which is directed away from areas at high risk. In this sense effects from the Preferred Strategy in combination with surrounding authorities are likely to neutral.
- 9.195 Additionally, the PPW presumption against such development is likely to ensure that development upstream from Monmouthshire in neighbouring authorities will be directed away from high risk areas, thereby minimising interference in the natural flow of watercourses through the County. The Preferred Strategy is similarly unlikely to direct development to locations which could have impacts further downstream in neighbouring plan areas. For example, in the context of the PPW and TAN15 development at Usk will be unlikely to be of a scale or at sites which could impact the River Usk downstream as it flows through Newport.
- 9.196 In terms of climate change mitigation there is greater potential for cumulative effects. As noted in the discussions of air quality and of transport, positive effects are anticipated from proposed expansion of the SE Metro throughout the Cardiff Capital Region, including in Monmouthshire. This includes enhanced rail connectivity between Cardiff and Abergavenny and Chepstow, and bus rapid transit between Cardiff and Monmouth. This will likely contribute to a modal shift away from high emitting transport modes towards sustainable travel. However, regional growth along major road arteries, such as growth in Newport along the M4 corridor and growth in Blaenau Gwent along the A465 corridor, could introduce additional road users as well.
- 9.197 The Cardiff Capital Region City Deal states an ambition for the ten authorities in the Cardiff Capital Region to come together to deliver strategic solutions for the region, including in relation to renewable energy. The City Deal identifies that regional development will present opportunities to deliver “*renewable energy-led regeneration and housing programmes*”. In this context there is theoretical potential for positive in-combination effects, particularly as larger-scale development offers a greater opportunity to incorporate low carbon energy, such as combined heat and power (CHP) schemes to support renewable energy and increased energy efficiency. It is recognised that development proposed through the adopted plans of the Brecon Beacons National Park, Forest of Dean and Herefordshire is unlikely to offer potential to leverage cross-boundary development of a scale suitable to deliver CHP. However, there could be potential to explore strategic CHP from development in the south of Monmouthshire in combination with the strategic Eastern Expansion Area in Newport.

10. Summary appraisal findings for the Preferred Strategy

Introduction

- 10.1 This chapter provides a summary of the detailed appraisal findings for the Preferred Strategy set out in the preceding chapter.

Summary appraisal findings

- 10.2 The ISA found that the Preferred Strategy has the potential for significant positive effects in relation to the economy and employment, population and communities and transport and movement ISA themes. It proposes a level of growth to meet the needs of communities during the plan period and distributes it according to the settlement hierarchy, the majority of growth being focussed at settlements where there is good access to sustainable transport modes and existing facilities/ services/ employment opportunities. Where possible, it takes advantage of opportunities being presented through the Cardiff Capital Region City Deal and South East Wales Metro.
- 10.3 The Preferred Strategy also has the potential for positive effects in relation to socio-economic objectives through maintaining and enabling the sustainability improvements that have arisen from the Covid-19 pandemic. The Preferred Strategy supports the delivery of priorities identified in the Welsh Government Building Better Places Covid-19 recovery document published in July 2020, which seeks to capitalise upon high levels of home working and reduced out-commuting. It is expected that the trend for remote working will continue over the longer term in accordance with Welsh Government's ambition of 30% of people working from or near home, this will make it less important where the jobs are located as commuting is reduced as a result of changing working habits and will support healthy placemaking. Indirect positive effects are also anticipated in relation to the wider ISA framework; including health and wellbeing, transport and movement, and climate change.
- 10.4 The ISA also found that there is the potential for a significant long term positive effect on the transport and movement ISA theme. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is better access to sustainable transport modes and wider infrastructure. At a strategic scale it takes advantage of opportunities arising from the Cardiff Capital Region City Deal and South East Wales Metro proposals, whilst at a settlement specific scale it provides for opportunities to enhance and extend the Active Travel Network and integrate new development into it.
- 10.5 As no specific sites/ allocations are identified at this stage, the ISA was not able to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the remaining ISA themes. The appraisal highlighted the potential for both positive and negative effects on the remaining themes depending on the precise location of growth and scale of development at the sites. Candidate sites will be considered through the ISA process in due course and the findings will inform the development of the Deposit Plan.
- 10.6 **Table 10.1** below sets out a summary of the appraisal findings for the Preferred Strategy 'as a whole' against each ISA theme.

Table 10.1: Summary appraisal findings

ISA theme	Commentary	Residual significant effect predicted at this stage?
Economy and employment	The Preferred Strategy proposes the delivery of new employment land and homes to meet identified needs and provide flexibility during the plan period. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. The Preferred Strategy takes advantage of the proposed South East Wales Metro rollout to Monmouth, Chepstow and Abergavenny (later in the plan period) and it also looks to capitalise on Monmouthshire's strategic location within the Cardiff Capital Region, between the Great Western Cities and Bristol/ SW region, and its access to the M4, M48 and mainline rail corridors to take advantage of local and regional economic opportunities. As a result, it should help to consolidate the existing high economic rate, further increase economic activity and potentially reduce out-commuting. Alongside supporting the development of new employment in job growth sectors (new technologies and advanced manufacturing, IT and cyber security, tourism and low carbon sustainable technologies) it will be vitally important to support and enhance education and skills related infrastructure in these areas to ensure that people have the right skills for these roles.	Yes - Positive
Population and communities	The Preferred Strategy proposes the delivery of new housing and employment land which meets and exceeds Monmouthshire's objectively assessed housing need. By taking a settlement hierarchy-led approach to distributing housing growth the Preferred Strategy focuses growth at locations which are best served by existing services, facilities and community infrastructure. This will help ensure that the majority of growth is located in reasonably close proximity to shops, schools, employment and healthcare whilst also providing opportunities to deliver new community infrastructure on or off site as necessary. The proportionate distribution of growth means that whilst the majority of growth is delivered at the most sustainable settlements, the smaller rural and remote settlements still receive some new growth and the associated benefits, particularly by introducing additional housing choice for first time buyers and elderly rural residents who may otherwise have found it challenging to remain living in their communities. By doing so it is considered that the Preferred Strategy will have associated benefits for the Council's social objectives, including meeting the housing needs of different groups within the community, building sustainable communities and sustaining rural communities. The strategy also incorporates an affordable housing policy-led element which will help to address the demographic and affordability challenges facing the County, having a long term positive effect.	Yes - Positive
Health and wellbeing	The Preferred Strategy proposes distributing growth according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. This will likely present opportunities to link new development with the existing walking, cycling and Green Infrastructure networks at each of the settlements, whilst also offering potential to secure enhancements to these networks through the development process. It is recognised that Monmouthshire is a largely rural plan area and in this context many of the smaller settlements which are allocated a small proportion of growth are unlikely to support walking and cycling access to services. Despite this it is important that such settlements receive the benefits of some growth to sustain their vitality. The Preferred Strategy directs the majority of housing growth to settlements with the widest range of healthcare facilities and requires that such facilities are enhanced as necessary through the development process to continue to provide a high quality service.	Uncertain
Equalities, diversity and	The Preferred Strategy's proportionate distribution of growth means that small rural communities will see some of the benefits of development, including the potential for delivering affordable housing in rural areas which could help to sustain the vitality and viability	Uncertain

ISA theme	Commentary	Residual significant effect predicted at this stage?
social inclusion	of rural settlements. A thriving hierarchy of settlements across the plan area will be an important aspect of tackling inequalities and deprivation within Monmouthshire in terms of ensuring access to employment, education and services at or near where the need for them arises. The affordable housing policy-led strand of the spatial strategy will also help to address the demographic and affordability challenges facing the County with a positive effect on this ISA theme. The Preferred Strategy also includes policy requirements which could help to deliver new or enhanced infrastructure, including education and training, across the plan area to help address deficiencies in provision. Additional policy requirements could help to create and sustain accessible, inclusive places through the development process which promote social inclusion and remove barriers to access. However, at this stage of plan making details on some key aspects of tackling inequality remain uncertain.	
Transport and movement	The Preferred Strategy gives great weight to the Active Travel Network and the importance of directing growth to locations which can either integrate with the existing network or enhance and extend the existing network in order to link with services and facilities. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is better access to sustainable transport modes and wider infrastructure. The distribution of growth also enables the Preferred Strategy to take advantage of the proposed South East Wales Metro rollout to Monmouth, Chepstow and Abergavenny (later in the plan period). The Preferred Strategy looks to capitalise on Monmouthshire's strategic location within the Cardiff Capital Region, strategic location between the Great Western Cities and Bristol/ SW region, and its access to the M4, M48 and mainline rail corridors which is an important element in ensuring the plan area's continued integration into the Cardiff Capital Region and beyond. At a strategic scale it takes advantage of opportunities arising from the Cardiff Capital Region City Deal and South East Wales Metro proposals, whilst at a settlement specific scale it provides for opportunities to enhance and extend the Active Travel Network and integrate new development into it.	Yes - Positive
Natural resources	As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the Natural Resources ISA theme. While there is a need to conserve natural resources, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. The nature and significance of effects are dependent on the precise location and scale of growth.	Uncertain
Biodiversity and geodiversity	As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the biodiversity and geodiversity theme. However in light of the emerging issue regarding nutrient loading in the River Wye and Usk SACs, preliminary phosphorus calculations for the Abergavenny and Monmouth (AECOM, 2021) found that potential residential or employment sites in these settlements are likely to have nutrient neutrality implications because they are served by WWTWs discharging into the upper reaches of both SACs. Monmouthshire's main settlements are further constrained by other sensitive receptors in close proximity to the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these receptors as well as a number that are located further away through various impact pathways. These sensitive receptors will need to be taken into account through the Council's candidate site appraisal process and inform the allocation of sites in the Deposit Plan. The Preferred Strategy includes policies that seek to protect and where possible enhance the natural environment and seek to mitigate the impacts of proposed development on biodiversity and geodiversity. Taking the above into account, an uncertain effect is identified at this stage. The nature and significance of effects are dependent on the precise location and scale of growth.	Uncertain

ISA theme	Commentary	Residual significant effect predicted at this stage?
Historic environment	As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment theme. There are a number of designated heritage assets within and surrounding the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these sensitive receptors, including their setting. The historic environment, including designated heritage assets, will need to be taken into account through the Council's candidate site appraisal process and inform the allocation of sites in the Deposit Plan. The Preferred Strategy includes policies that seek to protect and where possible enhance the landscape and historic environment. Taking the above into account, an uncertain effect is identified at this stage. The nature and significance of effects are dependent on the precise location and scale of growth. The Preferred Strategy is not likely to have any direct or significant effects on the Welsh language - indirectly the proposed delivery of housing and new jobs to meet needs as well as wider infrastructure has the potential for minor positive effects on the Welsh language.	Uncertain
Landscape	The Preferred Strategy proposes the delivery of new employment land and homes to meet identified needs and provide flexibility throughout the plan period. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements given the findings of the Sustainable Settlement Appraisal (2021). However, these locations (notably Abergavenny, Chepstow and Monmouth) are constrained in terms of proximity to nationally designated landscapes; the Wye Valley AONB and Brecon Beacons National Park. Preferred Strategy policies seek to ensure that development retains and enhances the key landscape areas, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects of the required growth. Notably, Strategic Policy S4 ensures that new development incorporates the principles of sustainable place-making and good design. While there is the potential for residual negative effects given that the Preferred Strategy is directing growth to settlements that are close to sensitive receptors, ultimately the nature and significance of effects are dependent on the precise location and scale of growth.	Uncertain
Climate change	The Preferred Strategy directs growth at settlements where there are areas of high fluvial and surface water flood risk; however, it is recognised that national planning policy and guidance via the PPW and Technical Advice Note 15 requires development to be directed away from the highest risk areas. The distribution of growth to the higher tier settlements could theoretically maximise the potential to seek strategic scale opportunities for delivering innovative renewable energy generation, such as combined heat and power (CHP). However, the overall quantum of growth proposed is relatively low in absolute terms, particularly once commitments have been taken into account, as a result it is not clear whether there will be meaningful opportunities to seek such schemes in practice. This will likely become clearer once a more definitive position is known in relation to the Strategic Growth Areas and specific site allocations.	Uncertain

Part 3: What happens next?

11. Introduction (to Part 3)

11.1 The aim of this chapter is to explain next steps in the plan-making/ ISA process as well as monitoring.

12. Next Steps

- 12.1 This Initial SA Report will accompany the Preferred Strategy for public consultation from **Monday 5th July 2021 to Monday 16th August 2021**. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and ISA process.
- 12.2 The representations received along with further evidence base work, including further ISA work, will inform the development of the Deposit Plan which is scheduled to be published for consultation in the summer of 2022. An updated ISA Report will accompany the Deposit Plan for consultation.

13. Monitoring

- 13.1 Monitoring measures will be established within the next version of the ISA Report to address the potential significant effects associated with the Deposit version of the plan.

Appendices

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans (Wales) Regulations 2004 explains the information that must be contained in the ISA Report; however, interpretation of Schedule 2 is not straightforward. Table IA links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table IB explains this interpretation.

Table IA: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Questions answered		As per the regulations...the SA Report must include...
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'context'?	
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of particular environmental importance
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Plan
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Submission Plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Submission Plan
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table IB: Questions answered by the SA Report, in accordance with regulatory requirements

Schedule 2***The report must include...***

1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
3. the environmental characteristics of areas likely to be significantly affected;
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
9. a description of the measures envisaged concerning monitoring.

Interpretation of Schedule 2***The report must include...***

<p>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</p>	<p>i.e. answer - <i>What's the plan seeking to achieve?</i></p>	
<p>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</p> <p>The relevant environmental protection objectives, established at international or national level</p>	<p>i.e. answer - <i>What's the 'context'?</i></p>	<p>i.e. answer – <i>What's the scope of the SA?</i></p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'</p> <p>The environmental characteristics of areas likely to be significantly affected</p> <p>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</p>	<p>i.e. answer - <i>What's the 'baseline'?</i></p>	
<p>Key environmental problems / issues and objectives that should be a focus of appraisal</p>	<p>i.e. answer - <i>What are the key issues & objectives?</i></p>	
<p>An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)</p>	<p>i.e. answer - <i>What has Plan-making / SA involved up to this point?</i></p> <p>[Part 1 of the Report]</p>	
<p>The likely significant effects associated with alternatives, including on issues such as...</p> <p>... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.</p>		
<p>The likely significant effects associated with the draft plan</p>	<p>i.e. answer - <i>What are the assessment findings at this current stage?</i></p> <p>[Part 2 of the Report]</p>	
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</p>		

Whilst Tables A and B signpost broadly how/where this report presents the information required of the ISA Report by the Regulations, as a supplement it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table IC.

Table IC: 'Checklist' of how (throughout the ISA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the ISA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What's the RLDP seeking to achieve?') presents this information. The relationship with other plans and programmes are also available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2018.
3. The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'ISA Framework', and this is presented within Chapter 3 ('What's the scope of the SA').
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	More detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report (2018) presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'ISA framework'.</p> <p>The context review informed the development of the ISA framework and themes, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how... considerations have been taken into account" -</p> <ul style="list-style-type: none"> • Chapters 5 explains how reasonable alternatives were established in 2019 in-light of earlier consultation and evidence. • Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives, with the detailed appraisal provided in Appendix II. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapters 9 and 10 sets out the findings of the appraisal of the draft plan.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<ul style="list-style-type: none"> • Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives at this stage with the detailed appraisal provided in Appendix II. • Chapters 9 presents the draft plan appraisal and the summary findings are provided in Chapter 10. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the ISA scope, and the need to consider the potential for various effect characteristics/ dimensions.</p>

7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Where necessary, the appraisal of the alternatives (Appendix II and Chapter 6) and the Preferred Strategy (Chapters 9 and 10) identify avoidance and/ or mitigation measures to reduce the significance of residual negative effects or to enhance residual positive effects. These will be explored further through the ISA of candidate sites and the Deposit Plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	As explained in Chapter 13, monitoring measures will be set out in the ISA Report that accompanies the Deposit Plan.
10. A non-technical summary of the information provided under the above headings	The NTS is provided in a separate document.

The ISA Report must be published alongside the Draft Plan, in accordance with the following regulations

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this ISA Report is published alongside the Preferred Strategy Document so that representations might be made ahead of the Deposit stage.

The ISA Report must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council has taken into account the Initial ISA Report when finalising the Preferred Strategy for publication. Further SA work will be carried out to inform the development of the Deposit Plan.

Appendix II: Appraisal of Strategic Options

Introduction

Each of the strategic options and growth areas identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in this Appendix.

Method

For each of the strategic options, the assessment examines **likely significant effects** on the baseline, drawing on the sustainability objectives and themes identified through scoping (see Table 3.1 in the main report) as a methodological framework

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted taking into account the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2.

Appraisal of options for the level of growth

An initial ISA of three growth options (high, medium, and low growth) was carried out in March 2020 (see section 5.2 of the main Report).

The Council has since revisited the Growth and Spatial Options stage of the RLDP process due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.

The Welsh Government population and household projections form the starting point for the RLDP evidence on growth levels, onto which policy choices can be added as needed, for example to ensure that the County's identified issues are addressed, objectives met and vision achieved. The 2020 publication of corrected Welsh Government 2018-based population and household projections comprise important new evidence that requires consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.

To take account of the latest evidence, an Updated Demographic Evidence Report (November 2020) was prepared by Edge Analytics, which sets out a range of updated growth options for the RLDP.³⁶

A total of fourteen different scenarios have been generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA.

The six growth options identified were included for consultation in the December 2020 Growth and Spatial Options Paper and are presented in Table AIII.1 overleaf.

³⁶ <https://www.monmouthshire.gov.uk/app/uploads/2021/04/Growth-and-Spatial-Options-Paper-Dec-2020.pdf>

Table AIII.13.1: Growth options

Growth Option	Type of Scenario	Population Change 2018-2033	Population Change %	Average Net Migration per annum	Household Change 2018-2033	Household Change %	Dwellings per annum	Dwellings 2018-2033	Jobs per annum	Jobs 2018-2033
1. Balanced Migration (with added policy assumptions) (Net Nil Migration (MR, CR_R), AH)	Demographic	-5,110	-5.4%	108	-240	-0.6%	-17	-255	-120	-1,800
2. WG 2018-based Principal Projection (AH)	Demographic	6,047	6.4%	818	3,749	9.3%	262	3,930	208	3,120
3. WG 2018-based Principal Projection (with added policy assumptions) (WG 2018-based Principal (MR, CR_R), AH)	Demographic	6,147	6.5%	825	4,551	11.3%	318	4,770	265	3,975
4. Dwelling-led Average (based on dwelling completion rates) (Dwelling-led 5 year average, AH)	Dwelling	10,641	11.3%	1,110	5,628	14.0%	402	6,030	364	5,460
5. Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R), AH)	Demographic	12,443	13.2%	1,223	7,255	18.1%	507	7,605	481	7,215
6. Employment-led projection (with added policy assumptions) (Radical Structural Change Higher (CR_R), AH))	Employment	17,403	18.5%	1,524	8,653	21.6%	604	9,060	642	9,630

A comparative appraisal of the options has been carried out under each ISA Theme and are presented in the tables below.

ISA Theme: Economy and employment

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	5	4	3	2	1	1
Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Discussion	<p>Options 1 to 4 all represent jobs growth at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce, as well as a declining customer base, under these four options. As a result, negative effects are considered likely, which increase in significance as the rate of growth decreases. Option 1 performs notably worse when compared to the other options by providing no opportunity to support economic growth and resulting in a loss of jobs in the County over the Plan period. Negative economic impacts are considered likely to be of significance under Option 1.</p> <p>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 this 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, supporting and encouraging indigenous businesses and inward investment. The Options provide greater opportunities associated with the Cardiff Capital Region City Deal, the SE Wales Metro and the removal of the Severn Bridge toll. Considering these benefits to local economy and employment, significant long-term positive effects are anticipated under both Options 5 and 6. The difference between these two Options largely relates to the overall level of growth. Whilst higher growth (Option 6) will ultimately be likely to enhance the significance of effects, it can be said that Option 5, by more closely aligning with past delivery rates in the earlier years of the Plan period, presents a more realistic option. As a result, it is difficult to distinguish any significant differences when ranking these two Options.</p> <p>To summarise, there is an assumption that the higher the level of economic and housing growth, the greater the potential significance of positive effects. The lowest growth Option (Option 1), through negative growth, is considered likely to lead to negative effects of significance. At the other end of the scale, both Options 5 and 6 are considered likely to lead to positive effects of significance. 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 wholly appropriate to rank Option 6 any higher than Option 5 at this stage, reflecting a marginally higher uncertainty in relation to achievability.</p>					

ISA Theme: Population and communities

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	5	4	3	2	1	1
Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Discussion	<p>The Monmouthshire Annual Monitoring Report of the Adopted LDP shows that both the annual level of housing completions monitored against the Average Annual Requirement (AAR) and the total cumulative completions monitored against the cumulative requirement (Cumulative AAR) are under delivering , although in more recent AMRs the % of under delivery has steadily declined as strategic sites have come forward . As such, it is considered that Option 1 would perform negatively in terms of contributing 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. Option 1 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 of significance could therefore be considered likely under Option 1.</p> <p>Options 2 to 6 deliver gradually increasing levels of growth, 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, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces and an improved public realm.</p> <p>This will be particularly important in addressing potential future demographic imbalances, and modelling suggests that natural balances are more likely to be achieved with the growth levels proposed under Options 5 and 6. Under these options growth in younger age brackets, particularly those of working age, balance out the effects of an ageing population, and new development provides the opportunity to address the changing needs of residents in this respect.</p> <p>While high growth proposed through Options 5 and 6 present the potential to deliver a greater level of infrastructure improvements, the Options, given the scale of growth in the context of the County, may also place increased demands on existing infrastructure. Notably, in terms of education, Options 5 and 6 would likely result in a significant growth in the number of school aged children, placing more pressure on the capacity of existing schools. However, the level of housing delivery would provide a substantial opportunity to secure additional provision through planning gain to fund extensions and/ or new schools. Conversely, Option 1 would likely result in a decline in school aged children, placing less pressure on the capacity of existing schools, although it would provide less scope to secure any improvements through planning gain and could lead to potential school closures.</p> <p>Taking the above into account it is considered that as the level of growth increases so does the likelihood for positive effects of significance. Options 5 and 6 would provide a greater range of new homes to meet the predicted increased population and affordable housing needs, and they are therefore more likely to have a residual</p>					

ISA Theme: Population and communities

significant effect. 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.

ISA Theme: Health and wellbeing

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	5	4	3	2	1	1
Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Discussion	<p>At the time of the 2011 Census 46.4% of Monmouthshire residents felt that they were in 'very good health' (Wales 46.6%), whilst 4.6% felt that they were in 'bad health' (Wales 5.8%). This reflects the 2017/18 data on lifestyle and behavioural choices for adults in Wales, which shows that Monmouthshire has a lower proportion of smokers, e-cigarette users and lower proportion of those who are overweight and/ or obese. However, Monmouthshire has a higher percentage (24%) of those who consume more than 14 units of alcohol on a weekly basis, which was higher by 6% and 5% than in the Aneurin Bevan Health Board area and Wales respectively.³⁷ The 2019 WIMD health domain further highlights deprivation relating to the lack of good health. In Monmouthshire, there are 20 LSOAs in the 50% most deprived, 5 LSOAs in the 30% most deprived, and 2 LSOAs in the 20% most deprived. Whilst Monmouthshire's residents have good access to public open space, a recreation and open space survey established a deficiency of more formalised provision in many of the County's communities of outdoor sport, equipped children's play and allotments.</p> <p>Given the high-level nature of the Options and uncertainties at this stage, it is difficult to highlight any significant differences between the Options. It could be suggested that as the level of growth increases so does the potential for a greater loss of green/ public open space; however, this is dependent on the location of development. Furthermore, the higher levels of growth under Options 5 and 6 could increase pressure on existing health services; and it is recognised that Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny. Despite this, there are certain health benefits associated with growth and development. This includes the potential for new or improved community services and facilities supporting growth in the County, including healthcare, open spaces, green infrastructure and retail and leisure. Further, development which delivers transport and infrastructure upgrades can improve accessibility and safety for residents. The importance of improved connectivity and accessibility to local facilities and open space, in light of the on-going pandemic, highlights the potential for higher growth options (Options 5 and 6) to support more positive health outcomes. However, there is also a need to manage the impacts of growth on local infrastructure capacity to ensure that no unnecessary burdens are placed on existing infrastructure. Considering this, positive effects under Options 5 and 6 are less likely to be of significance.</p> <p>Option 1 is notable for a declining population, work force and economic base. The imbalanced demographic under this option, which prevails to lesser extents through Options 2, 3 and 4 respectively, are considered for the potential to exacerbate negative health implications. This includes a lack of ability to address changing housing needs (in terms of type, access and affordability) for a significant and growing proportion of elderly residents, as well as declining town and village centres exacerbating rural isolation in areas. The current pandemic highlights the importance of ensuring communities are balanced and socially sustainable to support more positive health outcomes, and the negative effects arising may be of significance under Option 1 where demographic imbalances are most acute. The significance of the negative effects arising under Options 2 to 4 become less certain as each proposes increasing measures to address demographic imbalances.</p>					

³⁷ National Survey for Wales 2017/18

ISA Theme: Equalities, diversity and social inclusion

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	5	4	3	2	1	1
Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Discussion	<p>At this stage the location of growth is not known, as a result it is difficult to determine how specific communities and protected characteristics are likely to be affected by the Options. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County; however, again this would be dependent on the preferred spatial strategy.</p> <p>Whilst lower growth could be argued to help protect the identity of existing communities, Options 1 to 4 have the potential to impact negatively on the age profile of the County leading to an unbalanced demographic, with only the over 60 age group showing any substantial growth over the Plan period. Under these options, younger age groups, particularly key working age groups are largely projected to decline overall. In particular, the forecasted decline in population and economic bases, including local centres, under Option 1 is considered likely to exacerbate the effects of rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure, the significance of which has been particularly highlighted through the on-going pandemic. As a result, negative effects under Option 1 have the potential to be of significance. The significance of negative effects under Options 2, 3 and 4 remain uncertain at this stage, reflecting the need to target the limited growth proposed under these options at specific demographic needs and issues in order to avoid significant effects arising.</p> <p>The higher growth Options (Options 5 and 6) would likely result in a more balanced demographic with an increase in the number of older and elderly people living in the County balanced against an increase in the younger age groups. This would impact upon the type of housing required and service providers across public and private sectors. The Options present opportunities to improve accessibility and reduce inequalities through an appropriate spatial strategy and lead to positive outcomes in relation to this ISA theme.</p> <p>Taking the above into account, Options 5 and 6 are considered to perform best overall, through the delivery of new homes, jobs and community infrastructure that strategically improves accessibility and connectivity within the County. The options are considered to have the greatest potential to support diverse and inclusive communities.</p>					

ISA Theme: Transport and movement

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	2	2	2	1	1	1
Significant effect?	No	No	No	No	No	No
Discussion	<p>At this stage, there is no evidence to suggest that the levels of growth proposed under any of the options would have a significant negative effect on the highway network. With no growth proposed under Option 1, and limited growth under Options 2 and 3, these Options are considered likely to lead to marginal effects in terms of congestion on the existing highway network. Whilst Options 4, 5 and 6 propose higher levels of growth that has greater potential for negative effects in terms of congestion, negative effects are not considered likely to be significant. Further, in light of the current pandemic, it is likely that higher levels of homeworking will also prevail as a longer-term trend. The higher growth Options (Options 5 and 6) further provide greater critical mass to enable more significant infrastructure improvements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition, such as expansion of the EV network, smart technologies, last mile deliveries and cycle route connectivity.</p> <p>The nature and significance of the effects will ultimately be dependent on where the development is located as well as the infrastructure improvements that could be provided. If the additional residential development is located close to the main settlements, taking advantage of the services/ facilities and employment opportunities on offer, and main bus routes and train stations, then there is the potential to reduce levels of out-commuting, encourage the use of sustainable transport and therefore encourage a modal shift. Similarly, if growth were to be focussed to the south of the County/ Severnside along the M4 corridor, this would utilise good links to the M4 and other sustainable travel links including rail at Caldicot and Severn Tunnel Junction Train Stations. Growth to the south would also capitalise upon transport improvements such as the removal of the Severn Bridge toll and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the SE Wales Metro. If additional growth is located away from the main settlements and Severnside, in the rural areas, then this is likely to exacerbate the current trend of private vehicle use and increase traffic on the highways network in the absence of significant interventions; given sustainable transport infrastructure is limited in these locations.</p> <p>Considering the above, whilst no significant effects are predicted, much uncertainty remains about the overall performance of the options in relation to this ISA theme until the spatial strategy is more clearly defined. However, it is duly recognised that Options 4, 5 and 6 have greater potential for positive transport outcomes than the limited opportunities provided through Options 1, 2 and 3 and the ranking of Options reflects this assumption.</p>					

ISA Theme: Natural resources (air, land, minerals and water)

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	1	2	3	4	5	6
Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>As the level of growth increases so does the likelihood for negative impacts on natural resources through the potential loss of greenfield/ agricultural land and mineral resources; reduced air quality as a result of increased traffic; and increased demand for water resources.</p> <p>The largest proportion of agricultural land (42%) in Monmouthshire falls under Grade 2, 'very good' agricultural land. This land is mainly identified near Caerwent, Llanvair Discoed, Caldicot and Mathern in the South of the County. A further 7% of the land is classified as Grade 1 (excellent). The proportion of 'good to moderate' (Grade 3) agricultural land within the County also represents 42%. The percentage of 'poor' (Grade 4) quality agricultural land in Monmouthshire is 9%. Alongside soil resources, South Wales is well-endowed with aggregate resources and it has inherited over time a substantial volume of permitted reserves, although the reserves are often variable in terms of quality and location. There is one limestone quarry within Monmouthshire, the Ifon Quarry which whilst not currently worked could be worked in the future. Additional limestone resources exist in the southern part of the County, but in general, the area is sensitive in terms of environmental capacity. Furthermore, some parts of the limestone resource lie within the Wye Valley AONB; MTAN1 (paragraph 49) indicates that no allocations should be made in respect of such areas. There are no significant sources of secondary aggregates in the area. Under the adopted Monmouthshire Local Development Plan Policy M2 (Minerals Safeguarding Areas), safeguarding zones are identified for sand and gravel and limestone resources within the County. A substantial part of the south of the County is affected by the limestone safeguarding area. The sand and gravel deposits are predominantly located in the Usk Valley.</p> <p>Option 1 does not propose further growth and as such is likely to avoid significant effects in relation to this ISA theme. Further, it is considered that mineral landbank obligations could be met under all Options, though it is recognised that increasing levels of growth will put increasing pressure on safeguarded areas, particularly those that encroach upon settlements. The overall loss of agricultural land and mineral resources is uncertain at this stage as it will be dependent on the precise location of development and if the land is greenfield or brownfield. The quality of agricultural land will also play a role in determining the potential significance of effects. It is however recognised that brownfield land is sparse throughout the County, and most development is anticipated to take place on greenfield land. In this respect, the Options that propose a lower level of growth are considered to perform better against this theme as they will require less land take, and this is reflected in the ranking of Options.</p> <p>Whilst air pollution is not a significant problem in Monmouthshire, air quality across the County varies with two Air Quality Management Areas (AQMAs) declared in Usk and Chepstow. It is therefore considered that significance of effects in this respect will be dependent on the location of growth, and the implementation of appropriate mitigation measures. As discussed under the transportation ISA theme, with an increase in population it is considered that higher growth options have greater potential for negative effects in relation to congestion on the existing highways network. However, no evidence suggests this will lead to effects of significance. Ultimately the spatial strategy should seek to reduce congestion pressures at AQMAs, and new development provides opportunities to address infrastructure upgrade requirements that</p>					

ISA Theme: Natural resources (air, land, minerals and water)

support more efficient movement in the highways network. New development also provides opportunities to increase local accessibility, particularly access to employment opportunities, which can in turn support reduced levels of out-commuting and congestion and support a modal shift. A higher level of homeworking brought on by the current pandemic is also considered likely to continue to some degree as a longer-term trend supporting reduced congestion and improved air quality. Considering this, whilst no significant effects are considered likely at this stage, the overall nature and significance of the effects in relation to air quality under Options 2 to 6 remain uncertain until the precise location of development is known.

Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth WRZ and the South East Wales Conjunctive Use System (SEWCUS) WRZ. The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. This WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.³⁸

Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands. As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there are no significant differences between the options in terms of effects on water resources. It is expected that development coming forward under any of the options can deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day.

There are 45 water bodies within Monmouthshire, 38 surface waters, such as rivers, lakes, canals and reens, and 7 groundwater bodies. 37 of these water bodies have been designated as protected areas, these are areas requiring special protection under other EC directives and waters used for the abstraction of drinking water. Not all water bodies are required to be assessed for chemical status, of the 15 in Monmouthshire which are required to be assessed 2 are failing to achieve good status, one groundwater and one river. The river that is failing is the section of the River Usk between the confluence with the River Gavenny and the confluence with the Olway Brook. The main reasons for the failures identified by these assessments have been identified as diffuse pollution from agriculture, low flows/ abstraction and physical modifications to watercourses, predominantly barriers to fish migration. In addition, there are some known urban diffuse sources from combined sewer overflows/ misconnections, affecting the Nedern Brook and the Gavenny River.

Options proposing a higher level of growth would place increased pressure on sewerage infrastructure; with the potential for long term negative effects. The increased growth could have impacts on water quality through increased impermeable surfaces and transfer of pollutants, but it is considered that there is suitable mitigation available at a development management level to ensure that residual effects are not significant. Taking the above into account, it is considered that there are no significant differences between the options at this stage in terms of the water environment.

³⁸ Welsh Water (2019) Final Water Resources Management Plan 2019 <https://www.dwrcymru.com/en/My-Water/Water-Resources/Final-Water-Resources-Management-Plan-2019.aspx>

ISA Theme: Biodiversity and geodiversity

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	1	2	3	4	5	6
Significant effect?	No	No	No	Uncertain	Uncertain	Uncertain
Discussion	<p>In terms of biodiversity and geodiversity the impacts will ultimately be dependent on the precise location of development. There are five European sites (Special Areas of Conservation (SAC), Special Protections Areas (SPA) or Ramsar sites) within the County; Severn Estuary SAC/ SPA/ Ramsar Site, River Wye SAC, River Usk SAC, Wye Valley Woodlands SAC, and the Wye Valley and Forest of Dean Bat sites SAC. Additionally, there are a further four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, Avon Gorge Woodlands SAC and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and could possibly be affected by growth proposed through the RLDP.</p> <p>In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs), located within the County, east of Monmouth. In terms of locally important biodiversity, there is one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. There are also approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs) designated within the County.</p> <p>Option 1 does not propose further growth and is therefore unlikely to affect biodiversity directly. It is assumed that none of the remaining Options would result in the loss of any international, national or locally designated sites or lead to negative effects of significance in this respect. However, 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. Option 6, by proposing radical growth has greater potential for negative effects of significance in this respect and the ranking of Options reflects this assumption.</p> <p>Despite this, it is recognised that higher levels 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; however, this is uncertain at this stage as the location of development is not known. 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.</p>					

ISA Theme: Biodiversity and geodiversity

Overall, no or limited growth under Options 1, 2 and 3 are not considered likely to lead to effects of significance. As the level of growth increases through Options 4, 5 and 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.
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ISA Theme: Historic environment

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	1	2	3	4	5	6
Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>In terms of the historic environment the impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has 31 Conservation Areas that are dispersed throughout the County. There are also 45 Historic Parks and Gardens varying considerably in size and character, three Landscapes of Outstanding Historic Interest, including Blaenavon Industrial World Heritage Site, and 164 Scheduled Monuments within Monmouthshire. There are also 2,206 listed buildings spread across the County.</p> <p>It is assumed that none of the Options would result in the loss of any designated heritage assets. Option 1 will not lead to any further growth and is not considered likely to directly affect the historic environment in this respect. The increasing level of growth proposed under Options 2 to 6 will ultimately increase the amount of land take and therefore result in wider impacts on the historic environment across the County, with Options 5 and 6 seeking higher levels of growth that have the potential for effects of significance. If this additional growth is located close to or within the setting of designated heritage assets, then there could be the potential for negative effects. It is also recognised that increasing levels of development have the potential to impact on rural townscape and village character. However, this is uncertain at this stage as the location of this additional development is not known, but the ranking of options reflects these assumptions. The higher levels of growth could also offer more opportunities to improve access to designated heritage assets or help to redevelop brownfield areas that are currently detracting from the historic environment, but again this is uncertain at this stage. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development and the implementation of mitigation measures.</p> <p>At this stage 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 are likely to have a significant effect on the welsh language.</p>					

ISA Theme: Landscape

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	1	2	3	4	5	6
Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>As for a number of other ISA themes, the nature and significance of effects on landscape/ townscape impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has a rich and diverse landscape, incorporating part of the Wye Valley AONB to the east of Monmouthshire and part of the Brecon Beacons National Park to the north west. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers some 14,880 hectares, which accounts for approximately 17% of the County. The part of the Wye Valley AONB located within Monmouthshire covers approximately 11,710 hectares and accounts for approximately 16% of Monmouthshire. There are also three landscapes of outstanding historic interest within Monmouthshire; including the Blaenavon Industrial World Heritage Site, the Gwent Levels and the Lower Wye Valley. A small portion of the Blaenavon World Heritage Site (approximately 20 hectares) lies within the Monmouthshire local planning area.</p> <p>No further growth is proposed under Option 1 and as such, no direct effects in relation to landscape are anticipated under this Option. The increasing levels of additional growth proposed under Options 2 to 6 are likely to require increasingly more land take, 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.</p> <p>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, which is reflected in the ranking of the Options.</p> <p>Delivery of any additional growth in the more rural areas is also more likely to result in a residual negative effect of greater significance, but again, this is dependent on the sensitivity of the landscape and scale and design/ layout of development.</p> <p>Alongside the potential for negative effects, it is recognised that there is 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.</p> <p>Considering the above, the overall effects remain uncertain for most Options. Despite this, the increased pressures on greenfield land and rural landscapes under the higher growth Options are reflected in the ranking of the Options.</p>					

ISA Theme: Climate change (including flood risk)

Options	Option 1 - Balanced Migration	Option 2 - WG 2018-based Principal Projection	Option 3 - WG 2018-based Principal Projection (with added policy assumptions)	Option 4 - Dwelling-led Average (based on dwelling completion rates)	Option 5 - Population-led (with added policy assumptions)	Option 6 - Employment-led projection (with added policy assumptions)
Rank	6	5	4	3	2	1
Significant effect?	No	No	No	No	No	No
Discussion	<p>In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. At this stage, we are not aware of any specific opportunities that would help to significantly reduce per capita GHG emissions or deliver new low carbon or renewable energy through a higher level of growth. It is therefore assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.</p> <p>However, higher growth options are noted for their potential to support infrastructure upgrades that reduce congestion and improve accessibility (particularly in terms of sustainable transport modes), and support a transition to lower-emission, and carbon neutral economies and networks. Further the higher growth options are also considered for their potential to contribute to improved ecological connectivity, green infrastructure networks, open spaces and urban greening measures which support improved climate resilience. As a result, the higher growth options are considered for potential positive outcomes, and this is reflected in the ranking of options.</p> <p>In terms of climate change adaptation, it is assumed that the additional growth proposed under Options 2 to 6 would be directed to areas of lower flood risk as per the sequential test. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems.</p>					

Summary findings and conclusions for growth options

ISA theme	Rank/ significant effect	Categorisation and rank					
		Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Economy and employment	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Population and communities	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	Yes - positive	Yes - positive
Health and wellbeing	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Equalities, diversion and social inclusion	Rank	5	4	3	2	1	1
	Significant effect?	Yes - negative	Uncertain	Uncertain	Uncertain	No	No
Transport and movement	Rank	2	2	2	1	1	1
	Significant effect?	No	No	No	No	No	No
Natural resources (air, land, minerals and water)	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Biodiversity and geodiversity	Rank	1	2	3	4	5	6
	Significant effect?	No	No	No	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	3	4	5	6
	Significant effect?	No	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Climate change (including flood risk)	Rank	6	5	4	3	2	1
	Significant effect?	No	No	No	No	No	No

For ISA themes relating to natural resources, biodiversity, the landscape and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors, and the potential mitigation measures available. Lower growth options are ultimately ranked more favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.

At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment. Given the limited brownfield resource in the County, development is likely to be primarily delivered on greenfield land, with residual negative effects likely. The significance of this effect will increase as the level of growth increases. There is currently uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.

Similarly, for the transport ISA theme, options proposing a higher level of growth are more likely to result in impacts on the local highway network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking as a result of the current pandemic are considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, the higher growth levels are considered for their potential to deliver accessibility and infrastructure improvements and result in more self-contained communities, reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth options are ranked more favourably overall.

Option 1 is noted for potential negative effects of significance in relation to the ISA themes of economy and employment, population and communities, health and wellbeing and equalities, diversity and social inclusion. This is predominantly due to negative growth severely restricting opportunities to address a likely resultant demographic imbalance and economic decline. Under this option, a decline in younger age groups, particularly working age groups, is likely to result in job losses, and a decline in economic and local centres exacerbating rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, a lack of future development may not only severely limit opportunities to address changing housing needs in terms of types and tenures but is also likely to drive up house prices and exacerbate affordability issues.

The higher growth options (Options 5 and 6) are identified as performing better against ISA themes relating to the economy and employment, population and communities, health/ wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County.

Appraisal of spatial strategy options

An initial ISA of seven spatial strategy options was carried out in March 2020 (see section 5.2 of the main Report).

As highlighted above, the Council is revisiting the Growth and Spatial Options stage of the RLDP process following the publication of the corrected Welsh Government 2018-based population and household projections in August 2020. The RLDP spatial options previously considered have been reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2019 consultation included a new settlement. These have since been discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11) which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, which focuses growth in the North of the County, has been included as a result of consultation responses on the 2019 Growth and Spatial Options.

Accordingly, a total of four broad Spatial Distribution Options remain relevant and have been taken forward as realistic options. These are set out below.

Table A111.3: Spatial strategy options

Option	Description
1 Continuation of the existing LDP Strategy	Growth would be distributed development 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.
2 Distribute Growth Proportionately across the County's most Sustainable Settlements	Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, 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.
3 Focus Growth on the M4 corridor	Growth would be predominately 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 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.
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.

A comparative appraisal of the options has been carried out under each ISA Theme. The appraisal assumes that each option will deliver the same quantum of growth. The findings are presented in the tables below.

ISA Theme: Economy and employment

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	1	1	2	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Discussion	<p>Monmouthshire's increasing ageing population and shrinking working age population is currently limiting employment growth throughout the County. This is exacerbated by limited job opportunities and limited public transport, particularly in rural areas, making it harder to access jobs, services and facilities.</p> <p>Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth, Raglan and Usk, all provide a range of employment opportunities, which is evidenced by their higher levels of self-containment.³⁹ The level of self-containment is a useful indicator of the number of people who live and work within the same settlement; providing significant potential for sustainable travel. Opportunities to maximise the self-containment of these settlements are more likely to be taken through Options 1 and 2 by focussing housing and employment growth towards these settlements. This will strengthen the local economy, ensuring an appropriate economic base to enable younger people to live and work locally within the County. It is considered that positive effects in this respect are also anticipated through all other Options; however, lower growth at these settlements may reduce positive effects in terms of promoting economic growth in the County's key centres.</p> <p>Option 3 will lead to positive effects through responding to the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. It seeks to capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County and its location between the 'Great Western Cities'. Directing growth close to the M4/ M48 will therefore provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County. In this context, it is recognised that the main concentrations of employment outside of the Primary Settlements are in the Severnside area, with the Primary Settlements and Severnside accounting between them for nearly 72% of all employment.⁴⁰ Directing growth to the South of the County therefore has the potential to deliver long term positive effects against this ISA theme.</p> <p>Option 4 will, conversely, lead to positive effects through focussing growth in the most sustainable Settlements in the North of the County, capitalising upon its strategic links to the Heads of the Valleys. Like Option 3, Option 4 also seeks to take advantage of the 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. Targeted growth in the North of the County therefore has the potential to lead to increased levels of self-containment, supporting sustainable communities at the most sustainable Settlements of North Monmouthshire. However, it is recognised that within Options 3 and 4, concentrating growth in either the South or North of the County would result in limited employment opportunities outside these areas, which would exacerbate existing high levels of out-commuting in other settlements (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3, and Chepstow, Usk and Severnside under Option 4). Additionally, this may limit economic growth in the wider County and exacerbate existing demographic issues.</p>			

³⁹ Monmouthshire County Council (2019) Sustainable Settlement Appraisal (Draft) Update reference

⁴⁰ Business Register and Employment Survey 2017

ISA Theme: Economy and employment

Another key issue for the County is the changing role of high streets. Changing shopping habits, the use of out of town retail centres and increased levels of internet shopping has resulted in increased vacancy rates in some of the County's main retail centres such as Abergavenny; impacting on local economic growth. The ongoing pandemic has also highlighted the importance of high streets and the need to protect the role and function of the high street in the local community. Technical Advice Note 4 (TAN 4) reiterates the important role that retail and commercial centres play in creating sustainable locations, seeking to ensure they have a positive future. It states that "...good access to and within, retail and commercial centres is key, both to the vibrancy of those places and to ensure that everyone in society has access to the wide variety of goods and services." Options 1 and 2 will lead to positive effects in this respect, through supporting the existing centres; protecting their vitality and viability through increasing footfall, and supporting existing/ attracting additional facilities, in the main county towns. Conversely, Options 3 and 4 which direct growth towards certain centres and not others may further the trend of increasing vacancy rates on those centres where growth is not focussed, leading to negative effects against this ISA theme. Specifically, long term positive effects are anticipated where options support the regeneration of the County's main centres. Investing in existing centres through Options 1 and 2 will likely retain retail expenditure and attract inward investment, adapting positively to the changing role of the high streets throughout the County.⁴¹

Tourism plays a significant role in the Monmouthshire economy, particularly in assisting in rural diversification. The County's historic town centres also attract tourists. All of the options could have a positive effect on tourism with Options 1 and 2 performing more strongly as growth is also directed to rural areas across the County.

Overall, Options 1, and 2 are likely to lead to positive effects of greatest significance; facilitating sustainable growth in accordance with the settlement hierarchy, addressing localised economic issues and supporting a well-connected diverse economy. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. Comparatively Options 3 and 4 perform less well given they focus growth in one area of the County to the potential detriment of the other.

⁴¹ Monmouthshire Retail Background Paper, 2018

ISA Theme: Population and communities

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 – Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	1	1	3	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Discussion	<p>As a result of in-migration the population of Monmouthshire has shown a steady increase over a ten year period to 2011; the County has a negative natural change. All Options perform positively in terms of providing housing to meet the identified needs of the County, with Options 1 and 2 best performing in this respect. Options 1 and 2 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. In terms of Options 3 and 4, housing will be delivered to either the South of the County (Option 3) or the North of the County (Option 4) only, resulting in needs not being met across all housing market areas. Additionally, there is a need to consider the potential impact on house prices arising in this context, given the delivery of affordable homes will be focussed in either the South or the North, and not meet needs more widely.</p> <p>In terms of addressing the wider needs of communities, Options 1 and 2 will deliver long term positive effects through focussing the majority of growth at the Primary Settlements and Severnside. It is considered that facilitating the provision of increased accessible services in these urban areas, supported by connective infrastructure, will meet local needs, recognising the role of these settlements as service hubs for their rural hinterlands. This will contribute positively towards encouraging younger people to reside in the County, and addressing issues surrounding accessibility for elderly residents. A level of housing will also be provided under Options 1 and 2 in Secondary Settlements, the Severnside area and some of the Rural Settlements. The Secondary Settlements offer services of a more local nature aimed at meeting the daily needs of their inhabitants and those living in the surrounding areas, while outside of these settlements are a large number of smaller settlements with a limited offer in terms of services and facilities. It is therefore recognised that delivering higher growth to these smaller rural settlements through Options 1 and 2 may place additional pressure on existing social infrastructure at these locations; notably health care facilities unless supported by new or enhanced infrastructure capacity.</p> <p>Option 3 will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County. Similarly, Option 4 will lead to positive effects through capitalising upon 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. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the North of the County.</p> <p>However, concentrating growth in the South (Option 3) or the North (Option 4) would also result in limited investment in infrastructure/ facilities outside the targeted locations, which would exacerbate existing reliance on the car and high levels of out-commuting in other areas (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3 and Chepstow, Caldicot, Usk and Magor under Option 4). Additionally, through Options 3 and 4, existing centres outside of the key development areas (namely the Severnside area (Option 3) and the most sustainable Settlements to the North (Option 4)) would not be supported, resulting in limited growth at these</p>			

ISA Theme: Population and communities

settlements. Rural areas in particular will be disadvantaged as they would not benefit from additional housing to help support existing facilities or attract additional facilities.

Consideration must also be given to the recent publication of the Future Wales The National Plan 2040 (Working Draft National Development Framework (NDF)) which indicates a desire to designate a Green Belt “*around Newport and eastern parts of the region*”. This is anticipated to include a large part of South Monmouthshire which may constrain future growth to some extent in this part of the County, although it is recognised that no main towns are considered to be within the Green Belt. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. Conversely the delivery of Option 3 would lead to negative effects; conflicting substantially with the Future Wales document through directing growth to the south where the Green Belt has been proposed. As all other Options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Overall, Options 1 and 2 are considered to perform best as they provide sufficient housing and employment opportunities to meet identified housing and economic growth needs throughout the County. Further the options distribute housing in line with the settlement hierarchy, helping to meet the needs of all communities. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. Comparatively Option 4 and in particular 3 perform less well due to the focus of growth in either the North or South of the County.

ISA Theme: Health and wellbeing

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	1	1	4	3
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Discussion	<p>In terms of improving the health and wellbeing of residents, Option 1 and 2 are anticipated to lead to long term positive effects through supporting and sustaining a hierarchy of vibrant town and village centres across the County. It is considered that the focus of growth in the Primary Settlements of Abergavenny, Chepstow and Monmouth, and Severnside settlements, would ensure sustainable access to a range of community services and facilities, including health, leisure and recreation; notably three of the four leisure centres in Monmouthshire are located in these Primary Settlements. Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community cohesion. Positive effects in this respect are also anticipated through Option 4; however, the level of growth directed towards these settlements is likely to be less.</p> <p>Whilst growth may place additional pressures on healthcare facilities, it is recognised that recent healthcare developments, such as the new critical care hospital in Cwmbran provides opportunities to support growth with enhanced sustainable healthcare care access in and around this location. Such opportunities are more likely to be capitalised upon under Options 1 and 2.</p> <p>The delivery of Option 3 and Option 4 present the opportunity to capitalise upon regional infrastructure connections, and are considered to be well located in terms of access to health services. In this context, under Option 3 residents would be a reasonable distance from the Royal Gwent Hospital in Newport and the new critical care hospital in Cwmbran. Chepstow Community Hospital is also accessible, located to the east of the M4 corridor/ Severnside. Under Option 4, residents would also have good access to Nevill Hall Hospital. Through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the Capital Region Deal, Option 3 and Option 4 may also provide opportunity for achieving infrastructure improvements/ provision in the South of the County through Option 3, and the North of the County through Option 4, building more sustainable communities. However, under both Options, infrastructure provision would be limited in the rest of the County, which may exacerbate the existing deficiencies seen in many locations in relation to community and recreational facilities. This may contribute to rural isolation in certain areas; notably within smaller rural settlements outside of North Monmouthshire under Option 4.</p> <p>All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional Green Infrastructure, public open space and recreation. The value and importance of having access to locally accessible open/ green spaces to assist in recreation and health and wellbeing has been heightened during the current pandemic and should be reflected in growth strategies. Options 1 and 2 perform most positively in this respect as growth (and therefore green infrastructure provision) is delivered throughout Monmouthshire, aiding ecological connectivity throughout the County. This is compared to Options 3 and 4 which focus development to the South and North of the County respectively.</p> <p>Given the rural nature of the County, it is considered that all options will lead to positive effects in terms of providing residents with access to the countryside; although the quality of this access may differ. Options 1 and 2 perform most positively in this respect as they direct a significant level of growth to Abergavenny which is located</p>			

ISA Theme: Health and wellbeing

in close proximity to the Brecon Beacons National Park, and Monmouth and Chepstow which are located in close proximity to the Wye Valley AONB. Significant growth at these locations will provide access to these valued natural spaces, supporting the mental and physical health and wellbeing of residents.

Overall, it is considered that all Options provide a significant opportunity to deliver improvements to social/ community infrastructure. The level of infrastructure delivery is expected to be similar under all options; however, Options 3 and 4 perform less positively compared to Options 1 and 2 given the focus of growth to only the South or North of the County. All Options also provide an opportunity to deliver new and improved areas of multi-functional Green Infrastructure alongside development, and promote access to the countryside, which has become increasingly important in light of the current pandemic. Options 1 and 2 are best performing in this respect given the direction of growth towards more areas of higher accessibility, and more dispersed growth with new provisions benefitting more areas.

ISA Theme: Equalities, diversity and social inclusion

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	1	1	2	2
Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Discussion	<p>At the time of the 2014 Welsh Index of Multiple Deprivation (WIMD) none of the 56 lower super output areas (LSOAs) in Monmouthshire were in the most deprived 10% (Ranks 1-191) in Wales or the most deprived 20% (Ranks 1-382) in Wales. However, the 2019 WIMD now shows that alongside 20 LSOAs in the 50% most deprived (doubled since 2014), 5 LSOAs were in the 30% most deprived, and 2 LSOAs were in the 20% most deprived. Almost half (47%) of the total population live in wards defined as being in rural areas (i.e. with a population of less than 10,000). Population densities are, as would be expected, highest in the towns, with the majority of rural wards having low population densities when compared to national averages. When looking at the population growth between the 2001 and 2011 Census in terms of the individual town and communities, the main towns which experienced the most growth during this period were Monmouth and Chepstow.⁴² Therefore Option 1 and 2 which seek to focus growth towards these Primary Settlements are anticipated to lead to long term positive effects in terms of providing increased opportunities through employment and housing provision for the younger population to live and work in Monmouthshire; enhancing the service roles of these settlements. The current pandemic has demonstrated the importance of ensuring communities are balanced and socially sustainable, particularly in terms of demography. Option 1 and 2 will also lead to positive effects through reducing inequalities between rural and urban areas; supporting and sustaining a hierarchy of vibrant centres across the County.</p> <p>Option 3, through capitalising upon the strategic links to the Cardiff Capital Region (CCR) and the provisions of the CCR City Deal, would likely provide opportunity for building more sustainable communities and achieving infrastructure improvements/ provision in the South of the County. However, this limits opportunities for sustainable development in the Primary, Secondary and rural settlements in the rest of the County, which may lead to increased levels of inequality throughout Monmouthshire. Additionally, it is considered that if mixed-development is not prioritised and successfully utilised through Option 3, there will be a risk of exacerbating existing problems of lack of social and community facilities in rural locations, and high levels of out-commuting in Severnside. This option could lead to rural isolation. Similar effects are anticipated through the delivery of Option 4, given development would be located at 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. Growth in the North of the County would provide access to employment, retail, community facilities and social infrastructure, building sustainable communities through the provision of homes and jobs and improved levels of self-containment. However, through Option 4 housing would only be directed to the North of the County and would not address need in other areas across the County; likely impacting upon Monmouthshire's demography, leading to inequality across the County. This would likely impact on the sustainability of existing rural areas as no additional growth would be provided to help maintain/ support rural facilities, or attract additional rural employment opportunities. This option could also lead to rural isolation.</p>			

⁴² Monmouthshire County Council (2011) Census 2011 Town and Community Council Statistics <http://www.monmouthshire.gov.uk/app/uploads/2015/08/Census-2011-Town-and-Community-Council-Statistics.pdf>

ISA Theme: Equalities, diversity and social inclusion

Monmouthshire's population profile in terms of ethnic groups is different to both the Wales average and that of the South East Wales region as a whole. At the time of the 2011 census, 98% of Monmouthshire's population classified themselves as white, compared to 95.6% in Wales and 93.7% in South East Wales.⁴³ The South East Wales figures are particularly influenced by the population profile of Cardiff which accounts for over 25% of the population of the region, and as would be expected the population profile is much more diverse in the city. Directing growth to the South of the County through Option 3 may contribute positively towards increasing the ethnic diversity within the County. In this context, utilising strategic links to the Cardiff Capital Region and South West England will likely support cross-boundary community cohesion, and capitalise upon regional social infrastructure connections. Positive effects are also identified in this respect in relation to Option 4, given there is the potential to develop links from Abergavenny to the wider Cardiff Capital Region.

Overall, Options 1 and 2 are preferred as they seek to support and sustain a hierarchy of vibrant centres across the County, directing the majority of the growth to the most sustainable settlements while also still delivering growth in the secondary settlements and rural areas. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. They are also anticipated to lead to positive effects in this respect, delivering affordable housing in both urban and rural areas and where there is greatest need. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. While Option 3 and Option 4 may support more sustainable communities and achieve social infrastructure improvements/ provision in the South and North of the County respectively, these options perform least well due to the likely isolation of communities and continuation of imbalanced demographic profile across Monmouthshire.

⁴³ ONS 2011 Census

ISA Theme: Transport and movement

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 – Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	1	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>Existing travel patterns in Monmouthshire reflect its rural nature; with a trend of relatively long travel to work distances, high levels of car ownership and reliance on the private car. Specifically, in 2011 82.4% of the resident population of Monmouthshire were travelling to work by car or van, compared to 76.4% in South East Wales and 78.8% in Wales. The volume of traffic in the County has also continued to increase, up nearly 10% in the seven years to 2017.⁴⁴ The primary points of road congestion in the region are on the M4, with regular issues of congestion near Newport reflecting the high commuter levels; affecting connectivity between Monmouthshire and Cardiff.⁴⁵ However, it is recognised that the recent increase in home-working as a result of the current pandemic is likely to continue over the longer term which will likely support reduced commuting levels and congestion in the future.</p> <p>While focusing growth along the M4 corridor through Option 3 may intensify traffic levels, it also has the potential to link housing and employment growth, utilising links to the M4 corridor and the removal of the Severn Bridge Tolls. This would reduce the need to travel by car, capitalising upon existing sustainable transport links such as rail at Caldicot and Severn Tunnel Junction Train Stations; and forthcoming improvements such as the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. The Metro will provide an opportunity for alternative sustainable travel; providing faster, more frequent and joined-up services using trains, buses and light rail.⁴⁶ Notably, the Regional Bus Rapid Transit will provide a west-east connection that will complement north-south travel connectivity provided by the railway lines, and provide residents with direct access to economic opportunities located in the Heads of the Valleys corridor.</p> <p>Positive effects are also anticipated in this respect but to a lesser extent through Option 4, which seeks to predominantly locate growth in most sustainable Settlements within the North of the County. This is with the ambition to capitalise on 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. However, lack of development outside of the Severnside area through Option 3, and outside of the most sustainable Settlements in the North through Option 4, would not generate sufficient infrastructure improvements and gains in other areas across Monmouthshire. This would likely exacerbate out-commuting in other areas and would not assist in improving self-containment of the main County towns outside the targeted growth areas (i.e. Abergavenny, Chepstow and Monmouth under Option 3, and Chepstow, and Severnside under Option 4).</p> <p>In terms of sustainable transport options available throughout the County, buses are most predominant, with the County being served by both local and national routes. The Primary Settlements of Abergavenny, Chepstow and Monmouth all have bus stations with hourly (or more frequent) services extending to the surrounding towns and villages and to the sub-region, including Bristol, Gloucester, Hereford, Newport and Cardiff. In terms of rail provision, Monmouthshire has four railway stations,</p>			

⁴⁴ 2011 Census⁴⁵ Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>⁴⁶ Welsh Government (2018) Rolling out our Metro <https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf>

ISA Theme: Transport and movement

Caldicot, Chepstow and Severn Tunnel Junction in the South of the County and Abergavenny in the North. The centre and north east of the County are poorly served for rail travel. Options 1 and 2 will therefore lead to long-term positive effects through directing growth to these Primary Settlements, capitalising upon the sustainable transport offer and supporting lower levels of car use.⁴⁷

The Public Rights of Way (PRoW) network is generally good throughout Monmouthshire; with some localised fragmentation, notably in the rural areas. There are also two national cycle routes within the County, both of these run from Chepstow; number 4 - The Celtic Trail (Severn Bridge to Pembrokeshire) and number 42 (Chepstow to Glasbury, Powys).

The Active Travel (Wales) Act (2013) requires local authorities in Wales to deliver year on year improvements in active travel routes and facilities. As such, Monmouthshire has prepared a series of Integrated Network Maps (INMs) which set out the Council's plans for improving active travel routes in and around certain settlements over the next 15 years. At the time of preparation the guidance stated that the settlements should have had a population of at least 2,000 at the time of the 2001 Census. For Monmouthshire this included the settlements of Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth and Usk. However, there are existing active travel routes in smaller settlements. The maps produced show proposed future networks of key walking and cycling routes, and include schemes for delivery in the next couple of years, schemes for delivery in the medium term (5-10 years), and longer-term (10-15 years) proposals of a more aspirational nature. The INMs were submitted to Welsh Government on 27 February 2018 and these have now been approved.⁴⁸

Options 1 and 2 focus development at settlements that provide the best current and future opportunities for achieving sustainable development; which offer a choice of transport modes and contribute towards the development of a sustainable transport network. New development will likely capitalise upon existing transport infrastructure at these locations, further promoting active travel and integrated sustainable transport opportunities. Additionally, it is considered that delivering jobs and homes in these locations will likely support levels of self-containment, reducing the reliance on the car for employment.

Despite the likelihood that higher levels of homeworking will prevail following the current pandemic, there is no guarantee that all residents will live and work in the same area, and a proportion are likely to continue the trend of out-commuting by car for journeys (recognising that currently only 3.6% of Monmouthshire resident working population travel to their place of work using public transport).⁴⁹ Congestion is notably an issue of concern in Chepstow (given the Air Quality Management Area [AQMA] present) where a large proportion of growth through Option 1 and 2 is targeted. This presents a challenge for development, as there is significant risk that this trend would be intensified.

An appropriate amount of development is also allocated through Options 1 and 2 to Severnside; with a lower level of growth to the County's secondary settlements and rural areas, recognising that in many rural areas there is often no accessible sustainable transport offer. Infrastructure provision is notably lacking in rural areas in the North of the County, and it is recognised that a Welsh Government (and subsequent Local Transport Plan (2015)) priority is to *"maximise the contribution that effective and affordable transport services can make to tackling poverty and target investment to support improvements in accessibility for the most disadvantaged communities"*. It is noted that this has been partly addressed by the introduction of a 'grass routes' bus service⁵⁰, which might be utilised through Option 2 supporting the growth of

⁴⁷ Ibid.

⁴⁸ Monmouthshire County Council (2019) Sustainable Settlement Appraisal (draft)

⁴⁹ ONS Census 2011

⁵⁰ A demand responsive bus service available during the week for all residents of Monmouthshire and accommodation providers who are members of the scheme

ISA Theme: Transport and movement

rural communities. However, further improvements to accessibility in these settlements are unlikely to be achieved as growth would not be of a critical mass to support significant infrastructure delivery. Directing growth to the rural settlements will therefore likely promote unsustainable travel patterns, with (despite a likely higher level of homeworking) a proportion of residents continuing to travel by car to existing centres to access services and employment.

It is recognised that all Options have the potential to contribute positively towards the Welsh Government's commitment to reducing reliance on the private car and supporting the transport hierarchy and a modal shift to walking, cycling and public transport (Planning Policy Wales, Edition 10). However, Options 1 and 2 are identified as best performing through directing growth to the Primary Settlements, which are all multi-modal transport hubs that benefit from active travel routes, existing railway stations (at Abergavenny and Chepstow only) and frequent bus services. The Primary Settlements are also well placed geographically to take advantage of the strategic road network in the County. These options are therefore most likely to promote a safe, efficient, accessible and sustainable transport system that supports self-containment at the Primary Settlements; providing opportunities for walking and cycling and encouraging active travel. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other.

Option 3 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/ provision in the South of the County, while Option 4 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/ provision in the North of the County. However, this would be at the expense of the remainder of the County, exacerbating out-commuting and private vehicle use in other areas. At this stage the potential effects are considered to be uncertain until further evidence base work is carried out relating to the impacts of growth on the highway network.

ISA Theme: Natural resources

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus growth in the North of the County
Rank	1	1	3	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.⁵¹ The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMA) declared at Primary Settlement Chepstow and Secondary Settlement Usk for NO₂.⁵² Directing growth to these locations through Options 1 and 2 (and to a lesser extent Option 3) has the potential to exacerbate existing air quality issues through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2015).⁵³ In accordance with the LTP and higher level policy frameworks, Options are anticipated to deliver mitigation where possible; ensuring the location of new development does not worsen conditions in the AQMAs, or result in the declaration of new ones. Further, the current pandemic has resulted in higher levels of homeworking which are likely to prevail in the longer-term, reducing congestion pressures on air quality. In this context, Options 1 and 2 will likely further support the increased use of sustainable transport and reduced reliance on the private vehicle through delivering homes that are well located to services, facilities and employment in existing centres.</p> <p>Delivering under all Options has the potential to lead to positive effects through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the CCR City Deal. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which would likely provide opportunity for building more sustainable communities and improved air quality</p> <p>There is a limited supply of brownfield land in the County, with the average percentage of housing completions on brownfield land over the past ten years totalling approximately 48.4%.⁵⁴ The lack of brownfield land in the urban areas is a concern for the RLDP, with limited opportunities existing in the Primary Settlements only. Options 1 and 2 are therefore best performing in this respect, as while growth is likely to be predominately greenfield development, brownfield land within the Primary Settlements will be utilised where possible. Option 4 seeks to deliver growth to the most sustainable Settlements in the North, which includes Monmouth and Abergavenny, in addition to Raglan; a Secondary Settlement. A significant proportion of development under Option 4 is therefore likely to be on greenfield land. Option 3 is also considered to lead to long term significant effects as there are limited opportunities for brownfield development in the Severnside area, with development likely to be predominately on greenfield land.</p>			

⁵¹ World Health Organisation (2019) Ambient air pollution: Health impacts <https://www.who.int/airpollution/ambient/health-impacts/en/>

⁵² Air Quality in Wales (2019) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

⁵³ Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

⁵⁴ Monmouthshire Housing Land Availability Surveys 2008-2018

ISA Theme: Natural resources

Monmouthshire has a significantly high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). All options are therefore likely to result in the loss of some areas of BMV agricultural land, leading to significant long term negative effects against this ISA theme. The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).⁵⁵ This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:

- **Primary Settlements** are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high quality Grade 2 land and non-agricultural land are present around Chepstow.
- **Secondary Settlements** include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east/ and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- **Severnside** is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor/ Undy, and north of Sudbrook.
- **Rural settlements** have not yet been defined⁵⁶; however, it is recognised that outside of the main settlements there is a significant amount of BMV agricultural land, reflecting the rural nature of the County.

In terms of the Options, it is therefore considered that directing growth to the existing main settlements through Options 1 and 2 will help to protect best and most versatile agricultural land in the rural areas. Option 4 is also anticipated to perform well in this respect, given growth is directed to the primary settlements of Abergavenny and Monmouth, and the secondary settlement of Raglan. However, it is recognised that there are limited opportunities for brownfield development within the County's existing urban areas, and that the delivery of all Options would inevitably lead to loss of greenfield land, as discussed above. Nonetheless it is considered that residual loss may be less significant under Option 4 as the settlements in the North are not identified as being significantly constrained in terms of BMV land. Given the extent of BMV land surrounding Severnside and the M4 corridor, it is considered that Option 3 will lead to significant long term negative effects through inevitable permanent loss of BMV land.

While mineral extraction plays a limited role in Monmouthshire's economy, there remains a need to safeguard the County's mineral resources in order to make an appropriate contribution to the sustainable supply of aggregates to the wider South Wales economy. Development would be located away from safeguarded areas under Options 1, 2 and 4. Due to the focus of development in the South of the County through Option 3, this Option has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present. Option 3 is therefore worst performing in this respect. The Options are considered to lead to neutral effects in terms of waste, as it is considered that all of them are capable of being served by appropriate waste infrastructure.

Water is supplied to Monmouthshire by the Dwr Cymru/Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the

⁵⁵ [http://lle.gov.wales/map/alc#m=-2.7235,51.59785,14&b=europa&l=908h:893h:1326,0.37:](http://lle.gov.wales/map/alc#m=-2.7235,51.59785,14&b=europa&l=908h:893h:1326,0.37;)

⁵⁶ Monmouthshire County Council (2019) Growth and Spatial Options Consultation Report

ISA Theme: Natural resources

majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

All Options are anticipated to deliver neutral effects in terms of impact on water resources, with no best performing Option identified. This is given the legal requirements in place for WRMPs, and that all Options are assumed to deliver the same level of growth throughout the Plan period. It is expected that development coming forward under any of the Options will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. This is in accordance with PPW10 (2018) which outlines the contributions planning can make, including “ensuring resilient local choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability.”

Overall, while it is difficult to identify any significant differences between the options in terms of water resources and quality, Options 1 and 2 followed by Option 4, are best performing in terms of utilising brownfield land and protecting BMV agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Option 3 performs least well given it may also lead to the loss of significant greenfield/BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

ISA Theme: Biodiversity and geodiversity

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 – Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	2	2	1	3
Significant effect?	Yes – Negative	Yes - Negative	Uncertain	Yes - Negative
Discussion	<p>It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity. In terms of internationally designated biodiversity sites, the following are located within the County:</p> <ul style="list-style-type: none"> • Severn Estuary Special Protection Area (SPA), Special Area for Conservation (SAC), Ramsar Site, and Site of Special Scientific Interest (SSSI) is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad. <ul style="list-style-type: none"> – Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl. – Primary reasons for Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity. – This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn. • River Wye SAC covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey. • River Usk SAC covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area. Wye Valley Woodlands SAC is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK. • Wye Valley and Forest of Dean Bat sites SAC straddles the Wales-England border, extending along the east of the County. It is underpinned by four SSSIs in Wales and nine in England, all of which lie entirely within the SAC. This composite of sites contains the greatest concentration of lesser horseshoe bat in the UK, totalling about 26% of the national population. • There are an additional four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and therefore could possibly be affected by growth proposed through the RLDP. A full HRA is currently being undertaken in respect of the replacement Monmouthshire LDP. 			

ISA Theme: Biodiversity and geodiversity

Additional development proposed through the RLDP is most likely to have impacts on the European sites discussed above through the loss and fragmentation of linear foraging habitats for bat species, atmospheric pollution, increased disturbance (recreation, noise and light), and through impact on water quality and resources. Both the River Wye SAC and the River Usk SAC are notably sensitive to increased nutrient loading, predominantly phosphates contributed from treated sewage effluent. Due to the increasing phosphate concentrations in both riverine systems, both Natural Resources Wales and Natural England have recently advised that development plans should not result in a net increase of phosphorus concentrations in both SACs, a concept known as nutrient neutrality. The HRA (2021) carried out for the RLDP concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications, because they are served by WwTWs discharging into the upper reaches of both SACs. The Chepstow and Severnside SGAs are served by Nash WwTW in Newport, which discharges into the Severn Estuary and therefore will not contribute phosphorus the River Wye and River Usk.

In terms of ranking the Options, it is considered that all Options are constrained to some extent by internationally designated sites. In this context, Option 3 has the potential to lead to negative effects on the Severn Estuary SAC given settlements such as Sudbrook within this Option are adjacent to the internationally designated site. Options 1, 2 and 4 have the potential to lead to negative effects on numerous internationally designated sites which extent throughout the Primary and Secondary Settlements. Notably the River Usk SAC passes through Abergavenny and Usk, the River Wye SAC passes through Chepstow and Monmouth, and Chepstow and Monmouth are also in close proximity of the Wye Valley Woodlands. As set out in the HRA (2021) development in Abergavenny and Monmouth is most likely to lead to nutrient neutrality implications with the potential for significant adverse effects on the SACs. Option 4 directs the highest level of growth to these settlements, followed by Options 1 and 2, and therefore is worst performing in this respect overall. In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Growth directed to Abergavenny through Options 1, 2 and 4 therefore have the potential to adversely impact upon SSSIs; including Sugar Loaf Woodlands SSSI and Coed-Y-Person SSSI. Impacts are most likely to arise as a result of increased recreational disturbance. There is also a cluster of SSSIs to the east of the County around Monmouth, and dispersed in the rural landscape between Monmouth and Chepstow in the south, which may also be impacted by Options 1, 2 and 4 given growth is directed to these locations. Notably Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs) and may be impacted by high growth at Monmouth.

There are also several SSSIs along the M4 corridor and to the southern extent of the County, including the Gwent Levels SSSI and component SSSIs under the Severn Estuary SAC as discussed above. Option 3 has the greatest likelihood for impacts on these SSSIs given the focus of development to the South of the County. Impacts are most likely to arise as a result of increased recreational disturbance, water pollution, and air pollution.⁵⁷

All of the Options have the potential to impact nationally designated sites, the nature and significance of effects will ultimately depend on the precise location of development and the implementation of mitigation measures.

In terms of locally important biodiversity, there is just one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. Cledden Bog LNR is located within the Wye Valley AONB in the rural landscape, and is not likely to be affected by any of the Options. Monmouthshire also includes approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs)). These predominantly relate to grassland and ancient and semi-natural woodland areas.

⁵⁷ Natural England (2015) Site Improvement Plan: Severn Estuary Mor Harfen <http://publications.naturalengland.org.uk/publication/4590676519944192>

ISA Theme: Biodiversity and geodiversity

SINCs are dispersed throughout the County, and it is considered that development coming forward under any of the Options could have localised impacts on these designed sites.

In addition to designated sites, all Options have the potential to result in adverse effects on biodiversity through loss of greenfield land and priority habitats. Habitat fragmentation is a key issue for the County; for example, fragmentation of hedgerows caused by development and canalised streams and rivers. Options 1 and 2 are likely to result in habitat loss and fragmentation across a wider area of the County whereas Options 3 and 4 are likely to have an effect of greater significance on a more localised area.

Overall, it is considered that all Options have the potential to adversely impact upon the County's biodiversity resource, with the potential for significant residual negative effects. The focus of development in the Primary Settlements through Options 1, 2 and 4 will likely result in increased pressure on the environment, due to concentrating growth in locations around the existing main settlements in the North where a number of internationally/ nationally designated biodiversity sites are located. Notably, focussing growth at the Primary Settlements of Abergavenny and Monmouth through Option4 (and a lesser extent Options 1 and 2) have the potential to lead to nutrient neutrality implications within the River Wye and River Usk SACs. Option 4 and then Options 1 and 2 are therefore identified as worst performing overall. In terms of Option 3, a number of the smaller rural settlements and Severnside are also constrained at an international/ national level, and therefore the potential for adverse effects cannot be ruled out at this stage.

It is also recognised that all Options have the potential to deliver positive effects on biodiversity through enhancement measures. This is currently uncertain, and therefore at the County scale it is difficult to differentiate between the Options. Ultimately the nature and significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

ISA Theme: Historic environment

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	=	=	=	=
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>There is one internationally designated site falling partially within the County; Blaenavon Industrial World Heritage Site (WHS), located to the west of Abergavenny. The WHS was inscribed by UNESCO in 2000 on account of its industrial landscape having Outstanding Universal Value (OUV). A Management Plan has been prepared for the period 2018-2023 a suite of policies for the continued effective protection, conservation, presentation and transmission of the Site's OUV.⁵⁸</p> <p>There are also a range of designated heritage assets and archaeological areas within the County:</p> <ul style="list-style-type: none"> • 31 Conservation Areas including a range of areas from market towns, rural villages and medieval castles. The largest three Conservation Areas are Mathern (231.6ha), Llanarth (203.1ha) and Abergavenny (152.8ha). In addition to these three, there are Conservation Areas located in the remaining Primary and Secondary Settlements. There is a collection of Conservation Areas to the south of the County, including within numerous settlements along the M4 corridor, and within rural settlements along the eastern border of the County. • 45 Historic Parks and Gardens varying considerably in size and character, the largest of which are Chepstow Park and Piercefield Park, both located in Chepstow. Many Historic Parks and Gardens are located in Chepstow and the wider south east of the County, with others distributed throughout the settlement hierarchy and in the more rural settlements, notably south of Abergavenny and north west of Monmouth. • 3 Landscapes of Outstanding Historic Interest have been identified by CADW within the County – Blaenavon, the Gwent Levels and the Lower Wye Valley. • 164 Scheduled Monuments are widely dispersed across the County. • > 2,206 Listed Buildings of which 2% are Grade I, 10% are Grade II * and 88% are Grade II. There are multiple Grade I listed buildings located within the Primary Settlements (notably five in Chepstow, four in Monmouth and two in Abergavenny - including the Abergavenny Castle Ruins within the town centre). Usk also has four Grade I listed buildings, including Usk Castle and its precincts. Of the Listed Buildings, 166 (7.5% of the stock) are identified as being 'at risk'. The four communities with the highest percentage of listed buildings at risk based on the number of buildings are: <ul style="list-style-type: none"> – St Arvans - 12 buildings – Tintern - 9 buildings – Rogiet - 4 buildings – Llanbadoc - 4 buildings • 10 Archaeologically Sensitive Areas (ASAs) of which the largest extends across the south of the County, covering Caldicot, Rogiet, Magor Undy, and the Gwent Levels. There are also ASAs present at each of the Primary Settlements, Usk and Raglan, and rural locations outside of the main settlements. 			

⁵⁸ Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018-2023
<http://moderngov.torfaen.gov.uk/documents/s35685/Blaenavon%20WHS%20Management%20Plan%20FINAL%20SEPTEMBER%202018.pdf>

ISA Theme: Historic environment

Given the volume of heritage assets located throughout the County, it is considered that all of the Options are likely have an impact on the historic environment. It is considered that growth focussed at the Primary Settlements in the North through Options 1, 2 and 4 will result in increased pressure on the rich historic environment present at these locations; including notably the WHS and its setting, extensive Conservation Areas (all of which contain numerous Listed Buildings), Registered Parks & Gardens, and Grade 1 Listed Buildings, at Abergavenny, Chepstow and Monmouth. Together with their settings, these heritage assets require protection and enhancement, in accordance with the WHS Management Plan (2018), Conservation Area Appraisals and requirements of Planning Policy Wales (2018). It is therefore considered that directing significant growth to these locations has the potential for negative effects of greater significance, and reflects a likely greater need for suitable mitigation in development strategies

It is noted that the redevelopment of brownfield sites in the Primary Settlements, i.e. through Options 1 and 2, and to a lesser extent Option 4, has good potential for positive townscape improvements. In this context, where proposals seek to deliver good, high quality design and appropriate layout, this may lead to landscape/ townscape improvements and positive effects such as increased awareness and access. This however is uncertain at this stage, and it is recognised that the County has a limited offer of brownfield land.

In terms of Option 3 it is considered that the South of the County is also sensitive in terms of the historic environment. Notably constraints include the ASA which extends across the M4 corridor; Portskewett, Caldicot and Major/ Undy contain Grade I Listed Buildings; Rogiet contains four listed buildings at risk; the Gwent Levels Registered Landscape of Outstanding and of Special Interest covers areas of Caldicot, Undy and Magor; and there are numerous Conservation Areas present. Focussing growth to the South therefore has the potential to adversely impact upon archaeological and/ or historic assets, their settings and intrinsic qualities. As discussed for other Options, development also has the potential to deliver neutral/ positive effects through having a positive contribution to an area's character or appearance. It is also noted that directing growth to the South of the County will preserve the historic environment in the remainder of the County, maintaining the historic landscape and setting of towns and villages, and protecting settlement identity.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. None of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Overall, it is difficult to rank the Options in terms of preference against this ISA Objective as they are all predicted to have a residual significant effect as they direct development to areas that are sensitive in terms of the historic environment; albeit in different areas of the County. It is considered that the significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

ISA Theme: Landscape

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	2	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County incorporates:</p> <ul style="list-style-type: none"> • Wye Valley AONB located to the east of Monmouthshire. The part of the Wye Valley AONB located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area. • Brecon Beacons National Park located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County. <p>In line with Planning Policy Wales (2018) it is recognised that the Wye Valley AONB and Brecon Beacons National Park are “valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.” In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to “Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”. Notably, Objective WV-D2 seeks to “encourage and support high standards of design, materials, energy efficiency, drainage and landscaping in all developments”.⁵⁹ In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development management functions in the correlating part of the County. The LDP “represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park.”⁶⁰ While protection is provided at the higher level, it is nonetheless considered, given the level of growth proposed through all Options, that development has the potential to adversely impact upon special landscape features, character, and setting.</p> <p>The focus of development in the Primary Settlements in the North through Options 1, 2 and 4 is anticipated to result in increased pressure on landscape character, setting, and the intrinsic qualities of the AONB and National Park. This is given Options 1, 2 and 4 direct a significant level of growth to Abergavenny which is located in close proximity to the National Park and Monmouth and Chepstow which are located in close proximity to the Wye Valley AONB.</p> <p>Option 3 directs growth away from Monmouthshire’s nationally designated landscapes, to the South of the County. This will likely reduce the potential for residual adverse effects through protecting these high quality landscapes, and directing growth to areas anticipated to be of higher capacity to accommodate new development, given the urban environment surrounding the M4 corridor. Additionally, directing growth along the M4 corridor will contribute positively towards the preservation of local</p>			

⁵⁹ Wye Valley AONB Joint Advisory Committee (2016) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2015 – 2020 <http://www.wyevalleyaonb.org.uk/index.php/publications/>

⁶⁰ Brecon Beacons National Park Authority (2019) Brecon Beacons National Park Local Development Plan (2018 – 2033) Preferred Strategy Consultation Document <https://www.beacons-npa.gov.uk/planning/draft-strategy-and-policy/local-development-plan-review/preferred-strategy/>

ISA Theme: Landscape

landscapes throughout the remainder of the County and the rural areas, avoiding development in the open countryside and supporting sustainable patterns of development.

Overall, given Monmouthshire's rural nature and the landscape assets present, it is considered that Options 1, 2 and 4 are more likely to have a negative effect as a result of development in the North. In terms of ranking the Options, Options 1, 2 and 4 are considered worst performing given these Options direct the highest level of growth in close proximity to the AONB and National Park. Option 3 is best performing and unlikely to give rise to significant effects given it concentrates growth along the M4 corridor which is an urban area distant from the nationally designated landscapes located to the east and north west of the County. Given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have an uncertain effect at this stage.

ISA Theme: Climate change

Options	Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Rank	2	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>Development proposed under any of the Options has the potential to incorporate renewable or low carbon energy, EV charging and smart infrastructure which can support more resilient community infrastructure. There are three substantial main rivers that pass through Monmouthshire, the Rivers Wye, Usk and Monnow and a number of smaller but significant ones are the River Trothy, Olway and Neddern. Monmouthshire is at risk from all types of flooding: surface water, ordinary watercourses, groundwater, rivers and the sea. Both the towns and rural areas are at risk from surface water flooding to various extents during heavy rainfalls. The terrain of the County with its hills, valleys and plains is also at risk of flooding from watercourses. It is considered that the River Wye has the potential to affect more properties than the others.⁶¹</p> <p>In line with the Flood Risk Regulations (2009), the Preliminary Flood Risk Assessment (PRFA) process has been carried out in order to establish the level of flood risk within the area. Subsequent to this, a Flood Risk Management Plan (FRMP) has been produced (2016) which sets out the findings of the PFRA.⁶² The FRMP highlights that in terms of fluvial flood risk, communities at most risk from a 1 in 1000 year flood (Flood Zone 2) are Monmouth, Abergavenny and Usk. Communities most at risk of 1 in 1000 year surface flooding (Flood Zone 2) were Caldicot, Abergavenny, and Chepstow. Monmouth, Magor/Undy, Llanfoist Fawr, Usk, and Portskewett all feature as part of the top ten communities at risk from surface water flooding.⁶³ As such, directing growth to the most sustainable Settlements through Options 1, 2 and 4 have the potential to lead to long term negative effects, given these settlements have been identified as high flood risk areas. It is considered that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding.⁶⁴ To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.</p> <p>Option 3 delivers growth to the South of the County, which is not identified through the FRMP as being significantly constrained in terms of fluvial flood risk, with only Magor/ Undy and Portskewett identified as at medium risk of surface water flooding. This Option is therefore likely to perform more positively than other Options, through delivering growth outside of areas at highest risk of flooding.</p>			

⁶¹ Monmouthshire County Council (2016) Monmouthshire County Council Flood Risk Management Plan <https://www.monmouthshire.gov.uk/app/uploads/2016/04/Flood-Risk-Management-Plan.pdf>

⁶² Ibid.

⁶³ Ibid.

⁶⁴ Welsh Government (2004) Planning Policy and Guidance: Flooding – Technical Advice Note (TAN) 15: Development and Flood Risk <https://gov.wales/technical-advice-note-tan-15-development-and-flood-risk>

ISA Theme: Climate change

Overall, it is considered that Options 1, 2 and 4 perform less positively compared to Option 3 given they direct growth to locations vulnerable to flooding. It is however recognised that there is a level of uncertainty for all Options at this stage, and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level.

Summary findings and conclusions for spatial strategy options

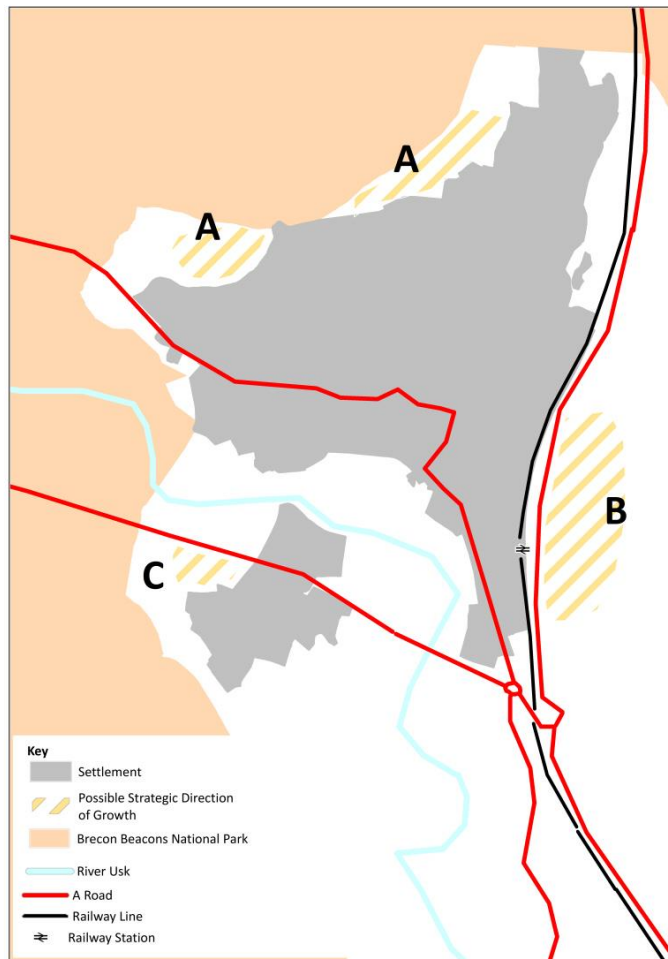
ISA Themes	Rank/ Significant effects	Categorisation and rank			
		Option 1 - Continuation of the existing LDP strategy	Option 2 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 3 - Focus Growth on the M4 Corridor	Option 4 - Focus Growth in the North of the County
Economy and Employment	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Population and Communities	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Health and wellbeing	Rank	1	1	3	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Equalities, diversity and social inclusion	Rank	1	1	2	2
	Significant effect?	Yes - Positive	Yes - Positive	Uncertain	Uncertain
Transport and movement	Rank	1	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Natural Resources	Rank	1	1	3	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	2	2	1	3
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Yes - Negative
Historic Environment	Rank	=	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Landscape	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Climate Change	Rank	2	2	1	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

- 13.2 The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints; albeit in different areas of the County. However, it is recognised that mitigation could be provided and that development also has the potential to deliver positive effects environmental improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.
- 13.3 While similar conclusions can also be drawn in relation to biodiversity (given the presence of international, national and local designations throughout the County Borough), options can be differentiated between 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 WwTWs discharging into the upper reaches of both SACs. Option 4 directs the most growth to these Primary Settlements, followed by Options 1 and 2, and is therefore worst performing overall in terms of the biodiversity ISA theme.
- 13.4 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and in close proximity to landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have an uncertain effects in relation to the landscape and climate change themes.
- 13.5 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.
- 13.6 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment and facilities/ services. The importance of high levels of local accessibility to open space, services and facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.
- 13.7 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas, Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, 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 under Option 3 and Option 4 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.

- 13.8 Consideration is also given throughout the appraisal to the recent publication of the Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt *“around Newport and eastern parts of the region”*. This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire’s main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Appraisal of strategic growth areas

Abergavenny



ISA Theme: Economy and employment

Options	Option A	Option B	Option C
Rank	1	2	3
Significant effect?	No	No	No
Discussion	<p>Abergavenny plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Its location on the Heads of the Valleys road provides strategic links through its links to Brecon, Mid Wales and the wider Cardiff Capital Region; and the A465 separates the town from Llanfoist to the south. Options B and C to the east and west of the A456, respectively, are therefore considered to be less well connected to the town centre.</p> <p>Abergavenny is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town; a number of which are protected employment sites. The largest protected employment sites at Union Street, Hatherleigh Place and Mill Street are located to the south west of the main settlement. These employment sites are reasonably accessible from all growth Options, with all Options required to cross the A40 or A465 for access, and would therefore likely be reliant on the car. Nonetheless, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Abergavenny.</p> <p>Option B performs most positively in terms of providing access to Abergavenny railway station which is located adjacent to the Option, to the west. Abergavenny railway station connects residents with employment hubs opportunities of the County including Newport, Cardiff, and the Midlands. Options A and C are both located 1.6 miles, or a 34 minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.</p> <p>All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.</p> <p>Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option A is considered best performing given it is reasonably well connected with the town centre and employment opportunities; and is not detached by the A465; as is the case for Options B and C. Option B performs more positively than Option C given it's distance to Abergavenny railway station, and would support the uptake of sustainable travel to access employment opportunities outside of the County as long as suitable links to the railway station are delivered.</p>		

ISA Theme: Population and communities

Options	Option A	Option B	Option C
Rank	1	2	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term positive effects are predicted in this respect.</p> <p>There are however significant differences between areas of Abergavenny town, as reflected by the range in the average house prices. While some housing is amongst the most expensive in the County, Lansdown and Priory wards, which include the central area of the town northeast of the main shopping area, are much less desirable locations to live.⁶⁵ It is therefore considered that further growth to the north through Option A may lead to positive effects in terms of promoting regeneration in the north of the town, supporting the growth of existing communities and reinforcing Abergavenny's position in the settlement hierarchy as a Tier 1 Primary Settlement. It is however noted that Option A is approximately a mile or a 20 minute walking distance from the town centre where shopping and employment opportunities are focussed. While this is well connected comparatively with other Options it is noted that some residents (notably elderly and those with young children) may rely on the car for access.</p> <p>Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the options from the town centre, approximately a 2.4 mile or a 57 minute walking distance. Option B is a similar walking distance to Option A however would involve crossing the A465. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to support sustainable communities.</p> <p>While disconnected from the town centre, Option C nonetheless would be an extension of Llanfoist to the west of the town. As such it is considered that development at this location would lead to positive effects through integration with the existing sub-urban community, providing a level of infrastructure to support the smaller settlement. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.</p> <p>Overall, Option A, followed by Option B perform most positively against this ISA theme as they are the most well connected with the town centre, its services and facilities, and sustainable travel. Option A is most likely to support the growth/ regeneration of Abergavenny as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.</p>		

⁶⁵ Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

ISA Theme: Health and wellbeing

Options	Option A	Option B	Option C
Rank	1	2	2
Significant effect?	No	No	No
Discussion	<p>Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny, which has an established A&E department. Option A is 900m/ a 17 minute walk from the hospital. Option C is 1.2km from the hospital by car, however walking distance is 2.8 miles/ 58 minutes. Option B is the least well located, being over 3km from the hospital. In terms of GP surgeries, there are three located within Abergavenny, close to the town centre. Options A and B are within 1km / 18 minute walking distance of a GP surgery. Option C is considerably further from health facilities in the town centre, approximately 2.4km from Old Station Surgery. However, if travelling by car, Option C is also within 1km.</p> <p>Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands, and good road links to Cwmbran, Newport, Monmouth and the motorway system. Option B is best performing in terms of access to the railway station, which is located adjacent to the site to the west. Options A and B are both located 1.6 miles, or a 34 minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.</p> <p>All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop unless new bus stops are provided, and Option C has access to a bus stop on the B424; however, this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre.</p> <p>The town's proximity to the Brecon Beacon National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.</p> <p>Overall, Options B and C perform on a par in relation to the Health and wellbeing ISA theme. Option A is best performing in terms of proximity to health services. Option A performs similarly to other options in terms of supporting healthy forms of transport to reach health (and wider) services/ facilities. Option A is less well located in terms of access to the train station; however, it is recognised that the Abergavenny circular bus service provides improved access to some extent.</p>		

ISA Theme: Equalities, diversity and social inclusion

Options	Option A	Option B	Option C
Rank	2	3	1
Significant effect?	No	No	No
Discussion	<p>Abergavenny is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Abergavenny will lead to positive effects on new and existing residents' quality of life, supporting regeneration and creating more positively integrated communities. It is however noted that Option B is detached from residential development by the A465, which may reduce potential for positive integration with existing communities.</p> <p>In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD) looking at Abergavenny, and specifically the growth Options:</p> <ul style="list-style-type: none"> • Option A is within the 80% - 100% least deprived LSOAs in Wales; • Option B is within the 40% most deprived - 60% least deprived LSOAs in Wales; and • Option C is within the 40% most deprived - 60% least deprived LSOAs in Wales. <p>As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting some of the most deprived communities through Options B and C, positive effects are likely to be enhanced to some degree. Option C seeks to positively expand upon Llanfoist village to the west of Abergavenny.</p> <p>While not notably deprived itself, Option A performs positively through reducing inequalities between sub-urban and urban areas, given that the two most deprived LSOAs in Monmouthshire (Cantref 2 (ranked 459 out of 1896 in Wales) and Mardy 1 (ranked 286) are closely located to Option A, to the northeast of Abergavenny.</p> <p>Option A also performs most positively of the Options in terms of ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, especially those without access to private vehicles. Option C is least well performing in this respect as is the furthest of the options from the town centre (2.4km). Option B is a similar walking distance to Option A; approximately a mile or a 20 minute walking distance.</p> <p>Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, Option C is predicted to lead to positive effects of greater significance through targeting deprived areas; promoting equality and social inclusion through developing more inclusive communities. Option B performs least well of the Options given it is severed from the settlement by the A465, which may reduce potential for positive integration with existing communities.</p>		

ISA Theme: Transport and movement

Options	Option A	Option B	Option C
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>In terms of the strategic transport network, Abergavenny is closely linked to the A465, and plays an important role on the Heads of the Valleys road through its links to Brecon, Mid Wales and the wider Cardiff Capital Region. While levels of self-containment are high in Abergavenny, there remains a reliance on the car as the primary mode of transport, and therefore traffic throughout the town is a significant issue. In addition to high levels of through traffic currently experienced, it is noted that a high percentage of the overall travel to work flows for the County would be to Abergavenny. All Options are well located in terms of access to the strategic transport network (the A465 extends east and west of the main settlement), and it is considered that development under all Options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.</p> <p>Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands. However, of the Options, only Option B is well located in terms of access to the railway station, being located adjacent to the site to the west. Options A and C are both located 1.6 miles, or a 34 minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links. All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop, and Option C has access to a bus stop on the B424, however this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre. Option B performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within the town, and for wider commuter journeys.</p> <p>The town's proximity to the Brecon Beacon National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.</p> <p>All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the Options are better performing in this respect.</p> <p>Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel. While Option B would arguably provide the greatest opportunity for residents to capitalise upon a range of sustainable transport options; located adjacent to the railway station, and with access to the Brecons Way bridle, it is considered that the separation of the option from the main settlement by the A465 may reduce its potential to encourage a modal shift. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.</p>		

ISA Theme: Natural resources (air, land, minerals and water)

Options	Option A	Option B	Option C
Rank	1	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option A is best performing in this respect, being a mile or a 20 minute walking distance from the town centre where shopping and employment opportunities are focussed. However, this is arguably not an achievable walking distance for all residents (notably the elderly and families with young children), with many people still likely to rely on the car for access. Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the Options from the town centre, 2.4 miles away. Option B is a similar walking distance to Option A. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to promote sustainable travel. Option B has the potential to encourage modal shift given it is located adjacent to the railway station; however, suitable pedestrian links would need to be delivered for crossing the A465. Options A and C are both located 1.6 miles, or a 34 minute walk from the station. Options B and A are therefore best performing in terms of potential to improve air quality in the town.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2017).⁶⁶ The area containing Option C was found to be entirely Grade 2, while the area containing Option B was found to be partially Grade 2 and partially Grade 3a. Option A was the only Option found to include an area of land that is not BMV, containing Grade 2 and 3b. Option A is therefore best performing in this respect, as it would necessitate the least amount of loss of BMV land. All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.</p> <p>None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.</p> <p>Overall, all Options perform negatively against this ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing of the Options as it may encourage active travel to some extent, given its location 1 mile from the town centre; and is the least constrained Option in terms of BMV agricultural land. Option B performs more positively than Option C as it is located adjacent to the railway station, which may encourage modal shift.</p>		

⁶⁶ The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

ISA Theme: Biodiversity and geodiversity

Options	Option A	Option B	Option C
Rank	1	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>In terms of European sites, it is recognised that the HRA (2021) screening of the Preferred Strategy policies found that potential residential or employment sites in Abergavenny are likely to have nutrient neutrality implications for the River Usk SAC, because it is served by WwTWs discharging into the upper reaches of the SAC. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated given the level of development is considered equal across all options.</p> <p>In terms of differentiating between the Options, Option A is located 1km south of the Sugar Loaf Woodlands Special Area of Conservation (SAC), and Option C is located approximately 200m south of the River Usk SAC. Taking each European site in turn:</p> <ul style="list-style-type: none"> • The Sugar Loaf Woodlands SAC comprises 173.1ha of broad-leaved deciduous woodland (76.7%), and heath and scrub (23.3%). The site has been designated for its area of old sessile oak woods near the south-eastern fringe of the habitat's range. This is the largest in the UK and Europe. • The River Usk SAC covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area. <p>In addition to the water quality issue set out above, the HRA screening (2021) found that there is the potential for development to significantly affect the River Usk through recreation, and water quantity, level and flow.. As such, this site and potential impact pathways will be considered in more detail through the Appropriate Assessment stage.</p> <p>In terms of the Sugar Loaf Woodlands SAC, given the distance (more than 200m) from the nearest major road, adverse impacts are not anticipated on the site through atmospheric pollution. The SAC lies approximately 1km from the Strategic Growth Area of Abergavenny, indicating that it is likely to be within walking distance for new local residents. However, Natural Resources Wales' Core Management Plan does not refer to recreational pressure as a potential management requirement for the site.⁶⁷ It is therefore concluded that there will be no likely significant effects of the Monmouthshire RLDP on the Sugar Loaf Woodlands SAC and the site can be screened out from Appropriate Assessment.</p> <p>It is therefore considered that Option C performs most negatively in terms of potential impact on the River Usk SAC, given its close proximity. However, given the impact pathways identified, all Options have the potential to lead to adverse effects on the European site. It is however noted that effects may be less significant under Options A and B. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.</p> <p>There is a range of nationally and locally designated biodiversity located around Abergavenny. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some</p>		

⁶⁷ Countryside Council for Wales (2008) Core Management Plan for Sugar Loaf Woodlands SAC/SSSI
https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20A_.pdf

ISA Theme: Biodiversity and geodiversity

cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Usk SSSI through recreation, water quality and water quantity, level and flow. Option C performs most negatively in this respect given the proximity of the Option to the European designated site.

The Options are also constrained by Ancient Woodland, with a linear area located to the south/ east of Option A, and a significant area coinciding with Ysgyryd Fach hill to the east of Option B. It is considered that Options have the potential to adversely impact on these nationally important habitats (and associated species) through increased disturbance, noise, light and air pollution. This should be considered alongside the potential to possibly enhance these habitats and deliver significant positive effects. For example, development proposals could include the delivery of biodiversity net gain, creating ecological corridors between the woodland habitats and the Options.

The Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/mature trees extending through Options A and C, and along the field boundaries and along the A465 surrounding /within Option B. There is therefore potential for development across all Options to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all options have the potential to lead to long term significant negative effects as a result of nutrient neutrality implications for the River Usk SAC. In terms of ranking the Options, given the presence of the River Usk SAC/ SSSI, Option C is worst performing of the Options, with the greatest potential for negative effects on biodiversity. However, given the impact pathways identified through the HRA for the SAC, it is considered that Options A and B also have the potential to impact upon the European designated site; however, effects are likely to be less significant. Options A and B are also constrained in terms of potential indirect effect on Ancient Woodland; while all Options are constrained in terms of potential adverse effects on habitats present within/ surrounding the Options (i.e. through habitat loss and recreational disturbance). It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

ISA Theme: Historic environment

Options	Option A	Option B	Option C
Rank	2	1	3
Significant effect?	Uncertain	Uncertain	Uncertain
Discussion	<p>Option A is located to the north of Abergavenny and would extend the existing built up area toward the boundary with the Brecon Beacons National Park. Development would be in close proximity to the northern boundary of the Abergavenny Conservation Area and a number of listed buildings. It is assumed development would not extend beyond Pentre Lane or Deri Road into the National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the National Park and the Conservation Area. However, this is uncertain at this stage.</p> <p>Option B is located to the east of the A465 and apart from some listed buildings near the train station, it's not in close proximity to any designated heritage assets. However, as you move further away from the town and the A465 the elevation increases, and development is likely to become more visible from the settlement and the World Heritage Site (WHS) and National Park across the town. Furthermore, in terms of the wider historic environment this option would extend the built area beyond the A465, a natural barrier to the town for many years, into the countryside. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed, and the layout takes account of any important views into and from heritage assets within and beyond the settlement. However, this is uncertain at this stage.</p> <p>Option C is located to the north west of Llanfoist, between the B4246 and the Heads of the Valleys Road. It would extend the built up area to the boundary with the Brecon Beacons National Park as well as the Blaenavon Industrial Landscape WHS. Additionally, there are two listed buildings in close proximity to the growth area. It appears that the majority of the growth area sits at a lower elevation than the WHS, National Park and the Heads of the Valley Road. As a result, development is unlikely to significantly affect any views in or out from the WHS or the National Park. Development could affect the setting of a Grade II listed building (Glan nant-y-llan) on Church Lane but it's possible that development could avoid the area in the south east adjacent Church Road, which is slightly more elevated and therefore more visible in terms of the WHS and National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed and the layout takes account of any important views into and from the National Park, WHS and the listed building off Church Lane. However, this is uncertain at this stage.</p> <p>It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.</p> <p>Given uncertainties no significant differences between the options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the setting of designated heritage assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect proximity to designated heritage assets. While there are a significant number of uncertainties at this stage, Option B is considered to be less sensitive in terms of the historic environment compared to the other options. Development at Option A and particular Option C are more likely to affect internationally and nationally designated heritage landscapes and natural landscapes that have shaped development over time and contribute to the character of the area and settlement identities. By its proximity to the WHS as a significant heritage asset, development under Option C is least preferred.</p>		

ISA Theme: Landscape

Options	Option A	Option B	Option C
Rank	3	1	2
Significant effect?	Yes - Negative	Yes - Negative	Uncertain
Discussion	<p>As a largely rural County, Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Abergavenny, the built-up area to the north and west extends close to the Brecon Beacons National Park (BBNP) boundary and Llanfoist adjoins the Blaenavon World Heritage Site (WHS). In line with Planning Policy Wales (2018) it is recognised that these designated assets are “<i>valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.</i>”⁶⁸ In addition to national policy requirements, protection is also provided to the Brecon Beacons National Park through the established Local Development Plan (2007) in place and development control functions in the correlating part of the County.⁶⁹ In terms of the WHS, the Blaenavon WHS Management Plan (2018) identifies an overall vision and key principles for the management of the WHS.⁷⁰</p> <p>While protection is provided at the higher level, it is nonetheless considered that Options A and C have the potential to adversely impact upon special landscape features, character and setting of the BBNP and WHS. Development to the north through Option A and to the north west of Llanfoist through Option C, would expand the existing built up area toward the boundary with the BBNP; and Option C also has the potential to adversely impact upon the setting of the WHS. It is however possible that Options could accommodate development without any significant residual negative effects on the landscape as long it is sensitively designed, and the layout takes account of any important views into and from the BBNP and WHS. However, this is uncertain at this stage.</p> <p>It is also noted that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.⁷¹ Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Abergavenny. However, looking specifically at the Options in turn:</p> <ul style="list-style-type: none"> • Option A is categorised as being of high/medium landscape sensitivity to residential development. • Option B is categorised as having high/medium landscape sensitivity to residential development. • Option C is categorised as having medium landscape sensitivity to residential development. <p>Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the intrinsic qualities, character and setting of designated landscapes/ assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) findings. Option C is therefore identified as best performing given it is</p>		

⁶⁸ Welsh Government (2018) Planning Policy Wales

⁶⁹ Brecon Beacons National Park Authority (2013) Brecon Beacons National Park Authority Local Development Plan

⁷⁰ Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018 - 2023

⁷¹ White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

ISA Theme: Landscape

	the only Option with 'medium' sensitivity to residential development; however, this Option still has the potential to result in significant negative effects. Option A is worst performing given the potential impact on the BBNP; its open character and hillside setting. It is however noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.
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ISA Theme: Climate change

Options	Option A	Option B	Option C
Rank	2	1	3
Significant effect?	Uncertain	Uncertain	Uncertain
Discussion	<p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p> <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO₂ emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between options.</p> <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all options perform equally in this respect.</p> <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement, with good public transport links connecting residents with employment and services within and outside the County; notably Cwmbran, Newport, Cardiff and the Midlands. Option B arguably provides the greatest opportunity for residents to capitalise upon a range of sustainable transport options given its location adjacent to Abergavenny railway station. However, it is considered that the separation of the Option from the town centre by the A465 may result in heavy reliance on the car for primary mode of travel. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.</p> <p>In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Usk is a constraint to the south of the town and in parts of Llanfoist. Looking specifically at the Options, Option B is located within Flood Zone A, and is not at risk of flooding. However, Option C is at high risk of flooding, with a proportion of the Option located within Flood Zones B/ C. Option A includes a very small area within Flood Zones B/ C; extending north to south in the centre of the Option. It is however noted that development under Options B and C could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.</p> <p>Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, however given the presence of the A465 may result in increased reliance on the car for primary mode of travel. As such, effects on climate change in this respect are uncertain. Option C is worst performing of the Options, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.</p>		

Summary findings and conclusions for growth level options

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option A	Option B	Option C
Economy and Employment	Rank	1	2	3
	Significant effect?	No	No	No
Population and Communities	Rank	1	2	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	2	2
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	2	3	1
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic Environment	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	3	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain
Climate Change	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain

Conclusions:

No significant differences have been identified between Options for the Transport and Movement ISA theme.

All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However Option C performs most positively against the Equalities diversity and social inclusion as this Option best supports deprived communities to the west of the town.

All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.

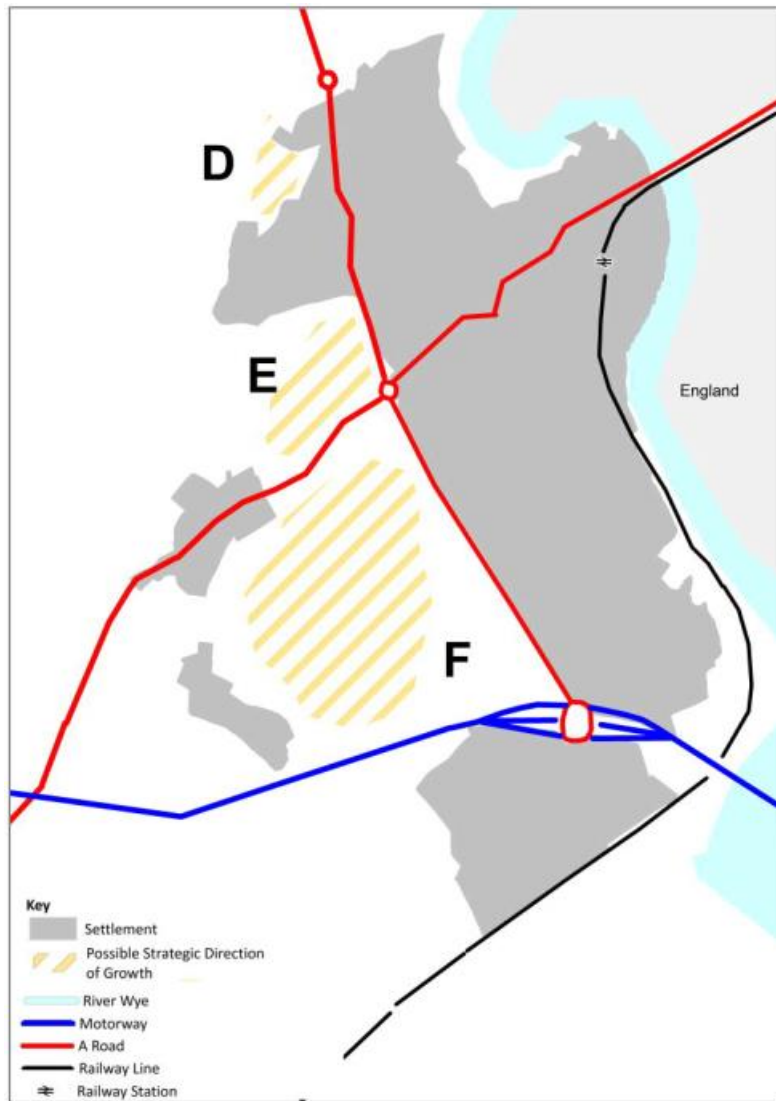
In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Usk SAC. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.

Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the BBNP, its open character and hillside setting. Option A is also worst performing given its 'high/medium' sensitivity to residential development; as set out in the Monmouthshire Landscape Sensitivity Update Study (2020). Option B is also identified as having 'high/medium' sensitivity to residential development.

The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Usk SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of this riverine SAC will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gain, and the enhancement of, designated assets.

Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage.

Chepstow



ISA Theme: Economy and employment

Options	Option D	Option E	Option F
Rank	3	2	1
Significant effect?	No	No	No
Discussion	<p>Chepstow plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Of all of the settlements appraised in the Sustainable Settlement Appraisal (December 2019) it achieves the highest weighted score. Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England and associated economic opportunities. These opportunities have been enhanced given the recent removal of the Severn Bridge Tolls. Option F is arguably best located in this respect, given its location adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west.</p> <p>In terms of facilities and services present, the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. Option E is best performing in terms of access to the town centre, being less than a mile or a 15 minute walking distance. Option D is approximately a mile or an approximate 19 minute walking distance from the town centre, while Option F is furthest away from the town centre at approximately 1.4 miles or a 29 minute walk.</p> <p>Chepstow is also one of the main focuses of employment within the County. Chepstow has a good range of employment sites within the town, with the largest being the Newhouse Farm Industrial Estate located to the south of the town on the motorway junction with the M48. In terms of access to this employment site, Option F is best performing, being located to the southwest of the settlement, with Option D worst performing being located furthest north. Nonetheless, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Chepstow.</p> <p>It is also noted that a high percentage of residents cross the River Severn daily to work in Bristol. Option F is therefore best performing in terms of access to the Severn Bridge and M48, supporting access to wider employment opportunities outside of the County.</p> <p>All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.</p> <p>Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Although least well connected with the town centre, Option F is considered best performing given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town.</p>		

ISA Theme: Population and communities

Options	Option D	Option E	Option F
Rank	=	=	=
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.</p> <p>There are significant differences between areas of Chepstow as reflected by the range in the average house prices; St Kingsmark ward has the highest prices and Thornwell ward the lowest.⁷² It is therefore considered that further growth to the south of Chepstow through Option F may lead to positive effects in terms of promoting regeneration in the south of the town, expanding upon the existing town centre/ retail uses and increasing the potential customer base. This would likely lead to further positive effects in terms of promoting the growth/ regeneration of existing communities and reinforcing Chepstow's position in the settlement hierarchy. However, it is noted that Option F is detached to some extent from the main built up area by the A466, and may not integrate well with the existing community. Option F may also negatively impact upon the identity of smaller, distinct communities in the open countryside to the west of the main settlement, notably between Chepstow and Pwllmeyric and Mathern. Option E may also perform negatively in this respect, between Chepstow and Pwllmeyric. Conversely, however, directing growth to smaller, suburban settlements would likely promote sustainable communities; improving access to the motorway and railway station for employment, wider services and facilities. Options D and E would extend the built up area of Bayfield to the north and south, respectively. Development at this location would likely more positively integrate with the existing community, providing a level of infrastructure to support the settlement and improve connections with the main town centre to the east.</p> <p>Overall, it is not considered possible to differentiate between the options at this stage. All options perform positively in terms of supporting the growth/ regeneration of Chepstow as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.</p>		

⁷² Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

ISA Theme: Health and wellbeing

Options	Option D	Option E	Option F
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>Chepstow does not include a hospital, however it is supported by Chepstow Community Hospital which includes two GP practices; Mount Pleasant and Town Gate surgeries. Chepstow Community Hospital is located to the west of the settlement, adjacent to the A466. In terms of access to the Community Hospital and associated GP surgeries, Option E is best performing, followed closely by Option D, with Option F least well performing. However, all Options are within 1 mile of the Community Hospital and therefore considered to have good access to health services. For wider hospital services (i.e. A&E and Minor Injuries Unit), Southmead Hospital is approximately 14 miles from Chepstow, and there is also the Royal Gwent Hospital and St Joseph's Hospital located in Newport; 18 miles and 19 miles from Chepstow, respectively. In terms of specialist needs; St Peter's Hospital is 9 miles from Chepstow on the outskirts of Newport, and is a centre for the assessment, treatment and rehabilitation of individuals with a wide range of complex neurodegenerative and organic disorders. Option F is best located in terms of access to wider hospital services to the east and west, given the close proximity to the M48, to the south of the Chepstow.</p> <p>Being located close to the M48, Option F also has the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e. through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant. However it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.</p> <p>While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466, however this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.</p> <p>Overall, all Options perform positively in relation to the Health and wellbeing ISA theme. It is difficult to distinguish between the Options at this stage, with all options providing residents with good access to health services, and supporting active travel.</p>		

ISA Theme: Equalities, diversity and social inclusion

Options	Option D	Option E	Option F
Rank	2	1	3
Significant effect?	No	No	No
Discussion	<p>Chepstow is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD), all Options fall within the 40% most deprived - 60% least deprived LSOAs in Wales overall, and fall within the same 20% bracket for all individual domains. However, all Options are within the 20% most deprived LSOAs in terms of access to services. As highlighted above, development at all Options will support equal, sustainable communities, notably with improved accessibility to services to address deprivation; but also through access to employment and affordable housing.</p> <p>In addition to addressing high levels of deprivation, directing growth around Chepstow will lead to positive effects in terms of improving access to services for vulnerable or immobile groups in the community (particularly elderly residents and young families). Option E is likely to deliver positive effects of greatest significance in this respect given Option E is most well connected with Chepstow town centre. This is followed by Option D, and subsequently Option F, which is approximately 1.4 miles or a 29 minute walk from the town centre. All Options also perform well through reducing inequalities between sub-urban and urban areas, expanding upon Bayfield, Pwllmeyric, Mounton and Newton Green to the west of Chepstow.</p> <p>Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. All Options will also support integration between urban and sub-urban communities, reducing inequality. In terms of ranking the Options, Option E performs most positively given it is most well connected to the town centre, providing access for vulnerable groups and supporting improved levels of deprivation. Option F performs least positively overall given its distance from services in the town centre, which may exacerbate deprivation levels in this respect.</p>		

ISA Theme: Transport and movement

Options	Option D	Option E	Option F
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>In terms of the strategic transport network, Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England. It is also recognised that the recent removal of the Severn Bridge Tolls has enhanced accessibility in this respect. Given its location adjacent to the M48, Option F is arguably the most well located of the Options, connecting with the M4 and Newport/ Cardiff to the south west.</p> <p>While levels of self-containment are high in Chepstow, there are consequently substantial daily flows of commuters to and from the town, with levels of car reliance high. The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.</p> <p>While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.</p> <p>All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.</p> <p>Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all options may increase traffic through the town, leading to adverse effects on air quality and the Chepstow AQMA, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel.</p>		

ISA Theme: Natural resources (air, land, minerals and water)

Options	Option D	Option E	Option F
Rank	=	=	=
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, this is particularly apparent through the Air Quality Management Area (AQMA) present at Chepstow (and another at Usk). Chepstow AQMA is located in the centre of the town, encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace. Chepstow AQMA was designated in 2007 for levels of NO₂; predominately caused by vehicle emissions from through traffic in the town centre. Options E and F are located adjacent to the AQMA, to the west of the A48 and the A48/ A458 roundabout. It is therefore considered that new development at these Options would lead to increased vehicular use within the AQMA, resulting in heightened levels of NO₂, and an overall adverse effect on air quality. While Option D is located further from the AQMA, to the north west of the town, residents will have to travel in to the AQMA to access services and facilities within Chepstow town centre, contributing to air quality issues. Negative effects are therefore predicted for all Options.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC grades at each of the Options has been based on predictive mapping. The area containing Options D and E were found to be entirely Grade 2, while the area containing Option F was found to be predominately Grade 1 with smaller areas of Grade 2 and Grade 3a. All Options therefore perform equally, given all are wholly located within BMV agricultural land, leading to the permanent loss of this resource. All Options also comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.</p> <p>All Options are considered to perform equally in terms of demand for water, and impact on water quality. All of the Options fall within the limestone minerals safeguarding area, and therefore also perform equally in terms of impact on the County's mineral resource.</p> <p>Overall, all Options are considered to perform equally against this ISA theme. Options are anticipated to have long term negative effects through increased vehicular use within Chepstow AQMA, and the permanent loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.</p>		

ISA Theme: Biodiversity and geodiversity

Options	Option D	Option E	Option F
Rank	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain
Discussion	<p>In terms of European sites, the Wye Valley Woodland SAC is located 600m east of Option D, 900m east of Option E, and 1.2km north east of Option F. The River Wye SAC is located 800m east of Option D, 1km east of Option F, and 1.5km east of Option E. Taking each SAC in turn:</p> <ul style="list-style-type: none"> • The Wye Valley Woodland SAC is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK. • The River Wye SAC covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey. <p>HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Wye Valley Woodland SAC through atmospheric pollution; and for development to affect the River Wye SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow. As such, the European sites, and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.</p> <p>There is a range of nationally and locally designated biodiversity located around Chepstow. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow; and to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.</p> <p>All Options are also constrained by Ancient Woodland:</p> <ul style="list-style-type: none"> • Bishops Barnet Wood and Great Barnet Wood is 100m northeast of Option D; • A small area of Ancient Woodland is located north of Option E, south of Mounton Road; and • There are two distinct areas of Ancient Woodland located within Option F, including East Wood. <p>There is the potential for development at Option F to have a significant negative effect on biodiversity through direct loss of this important habitat and associated species, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Effects are likely to be indirect through Options D and E given the proximity to the habitats. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing habitats where possible; delivering biodiversity net-gain. This may include creating ecological corridors and connecting biodiversity sites, notably through Option F.</p>		

ISA Theme: Biodiversity and geodiversity

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/ mature trees to the north and south west of Option E, and there are sparse hedges and areas of dense vegetation dispersed through Option F; in addition to the Ancient Woodland discussed above. There is the potential for development across Option F, and to a lesser extent Option E, to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all Options have the potential to lead to adverse effects on biodiversity, given the presence of the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and River Wye SAC/ SSSI to the east of the settlement. It is difficult to differentiate the Options in terms of impacts on the European designated sites given the impact pathways identified; although it is noted that Option D is considerably closer to the Wye Valley Woodlands than Option F, and is considerably closer to the River Wye than Option E; with the potential for increased significance of effects. In terms of wider biodiversity effects, it is considered that Option F is worst performing given the areas of Ancient Woodland (and other habitats and associated species) present within the Option. Options D and E are less constrained in terms of habitats present at the Options, however, are located in close proximity to Ancient Woodland, with the potential for residual indirect negative effects. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

ISA Theme: Historic environment

Options	Option D	Option E	Option F
Rank	1	1	2
Significant effect?	Uncertain	Uncertain	Yes - Negative
Discussion	<p>Option D does not contain any designated heritage assets within the growth area. Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west from the edge of the growth area. There is also a Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) situated to the north east across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure and it forms an important element within the wider later prehistoric context and within the surrounding landscape. It's possible that the site could accommodate development without any significant residual negative effects on the scheduled monument and wider historic environment as long it is sensitively designed; however, this is uncertain at this stage.</p> <p>Option E does not contain any designated heritage assets but there are three listed buildings in close proximity, one to the north close to Moun-ton Road and two to the south on the other side of the A48. The growth area is adjacent to the Mathern Conservation Area and is approximately 600m from the Moun-ton Conservation Area and a cluster of listed buildings that lie within it to the west. It's possible that the site could accommodate development without any significant residual negative effects on the Conservation Areas if development does not extend beyond St Lawrence Lane and it is sensitively designed with appropriate screening, and the layout takes account of views into and from the conservation areas. Another consideration in terms of the historic environment for growth in this area will be impacts on the St Lawrence House Grade II Listed Building in the north and it is likely that its setting would be affected by development in this area.</p> <p>Option F contains 16 listed buildings and is located entirely within the Mathern Conservation Area. Development within this growth area would result in the loss of large areas of greenfield/ open space within the Mathern Conservation Area and around the listed buildings present. There is the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area; however, there is some uncertainty at this stage.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.</p> <p>Overall, Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage; however, they are considered to be less likely to result in residual significant effects compared to Option F.</p>		

ISA Theme: Landscape

Options	Option D	Option E	Option F
Rank	2	1	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>As a largely rural County Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Chepstow, the area immediately north of the town lies within the Wye Valley Area of Outstanding National Beauty (AONB). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be “<i>valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.</i>”⁷³ In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to “<i>Ensure all development within the AONB and its setting is compatible with the aims of AONB designation</i>”. While protection is provided at the higher level, it is nonetheless considered that Options D and E have the potential to adversely impact upon the AONB, its special landscape features, character and setting.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>It is also noted that land to the west of the A466 is currently protected by a ‘Green Wedge’ policy to ensure the town’s physical separation from Pwllmeyric and Mathern. Part of Option E (the area between Moun-ton Road and the A48) and part of Option F (the area between the A48 and the M48) falls within the Green Wedge. It is considered that development at this location could lead to coalescence between Chepstow and Pwllmeyric (under Option E) and Chepstow and Pwllmeyric and Mathern (under Option F).</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA’s sensitivity to residential development.⁷⁴ Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Chepstow. However, looking specifically at the Options in turn:</p> <ul style="list-style-type: none"> • Option D is categorised as being of medium landscape sensitivity to residential development. • Option E is a mixture of medium and high/medium landscape sensitivity to residential development. • Option F is categorised as high landscape sensitivity to residential development <p>Overall, all Options are particularly sensitive in terms of the landscape, with the potential for significant long term negative effects. Depending on the design and layout of development, Options D and E could potentially affect the intrinsic qualities, character and setting of the AONB, while Option F could impact upon the sensitivity of the settlement itself; being located on sloping parkland/ and partial designation as a ‘Green Wedge’. In terms of ranking the Options, assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its ‘high’ sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB. For all Options, mitigation (which reduces the extent of</p>		

⁷³ Welsh Government (2018) Planning Policy Wales

⁷⁴ White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

ISA Theme: Landscape

development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

ISA Theme: Climate change

Options	Option D	Option E	Option F
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p> <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO₂ emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.</p> <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.</p> <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement with good public transport links connecting residents with employment and services within and outside the County; notably bus services run to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham. However, the A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all Options has the potential to result in increased vehicular use in and around Chepstow.</p> <p>In terms of managing flood risk to address climate change, while it is recognised that the east of the town is constrained by the River Wye, all Options are located to the west of the Chepstow and therefore are at low risk of flooding.</p> <p>Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, the presence of the A48 (and connectivity with the M48 and M4 corridor), may result in increased reliance on the car for primary mode of travel, exacerbating air quality issues in the centre of the town and within Chepstow AQMA. As such, residual effects on climate change are uncertain.</p>		

Summary findings and conclusions for growth level options

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option D	Option E	Option F
Economy and Employment	Rank	3	2	1
	Significant effect?	No	No	No
Population and Communities	Rank	=	=	=
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	=	=	=
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	2	1	3
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	=	=	=
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	1	1	2
	Significant effect?	Uncertain	Uncertain	Yes - Negative
Landscape	Rank	2	1	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Climate Change	Rank	=	=	=
	Significant effect?	No	No	No

Summary findings:

No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.

All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.

All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, with the potential for long term negative effects.

Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.

All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.

The potential for Options to lead to significant effects against the biodiversity/ landscape/ historic environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gain, and the enhancement of designated heritage assets.

For all Options, effects against Climate Change are uncertain at this stage.

Monmouth



ISA Theme: Economy and employment

Options	Option G	Option H	Option I
Rank	2	1	3
Significant effect?	No	No	No
Discussion	<p>Monmouth plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. It has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466) and has a range of bus services to the South Wales cities and to Gloucestershire and Herefordshire. Option I notably has good access to the A40 and A466.</p> <p>In terms of facilities and services present, Monmouth scores well within the settlement appraisal, given its relatively large number and good range of shops and restaurants, and is a vibrant focus for the surrounding area. Option H performs most positively in this respect, being centrally located and approximately 0.5 miles / 11 minute walk from town centre. Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or a 13 minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28 minute walk. Option G would likely rely on the car for day-to-day access to services and facilities in the centre, via the A40/ A466.</p> <p>Monmouth is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town. Monmouth's largest employment area is an Industrial Estate to the South West of the settlement. There has also been recent strategic growth to the south west of the town with a mixed-use development to the west of the Wonastow Estate allocated under the current LDP, which is near completion. In terms of access to employment to the southwest of the town, Option G is best performing, being located adjacent to employment focussed along Wonastow Road. There is also opportunity for Option G to extend upon the existing Wonastow industrial estate. Option H is located 1.1 mile/ 23 minute walk from Wonastow Road, while Option I is least well performing of the Options in this respect, being located 1.8 miles/ 36 minute walk from employment opportunities to the south of the town. Residents at Option I would therefore likely be reliant on the car for access. Nonetheless, all Options perform positively in terms of providing access to local employment sites, supporting levels of self-containment in Monmouth.</p> <p>All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.</p> <p>Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Option H is best performing as it is most centrally located in terms of access to the town centre, its services and facilities, and is within reasonable distance of employment opportunities to the south of the town. Option G also performs well given its location adjacent to the Wonastow Estate employment site; however, it is most distant from the town centre. Option I is reasonably well located in terms of the town centre but performs poorly in terms of access to Wonastow Estate.</p>		

ISA Theme: Population and communities

Options	Option G	Option H	Option I
Rank	2	1	1
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.</p> <p>There are significant differences between areas of Monmouth as reflected by the range in the average house prices; Dixton with Osbaston ward has the highest house prices and Wyesham ward the lowest.⁷⁵ All Options direct growth to the north of the A40, away from Wyesham which is located to the south of the town. Option I is located in close proximity to Dixton, to the north east of the Option.</p> <p>All Options have the potential to support the growth of existing communities; however, this is likely to be more achievable through Options H and I, given their location in terms of access to the town centre (0.5 miles/ 11 minute walk from Option H, and 0.7 miles/ 13 minute walk from Option I). Notably Option H would extend existing built form at Over Monnow, while Option I would extend the suburb of Obaston to the north east of Monmouth, supporting regeneration at these locations. Option G is arguably more isolated in this respect, being less well connected to the town centre (1.4 miles and a 28-minute walk). Nonetheless, all Options would likely integrate positively with existing communities present, providing a level of infrastructure to support the sub-areas and improve connections with Monmouth town centre. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.</p> <p>Overall, it is considered that all Options perform positively in terms of supporting the growth/ regeneration of Monmouth as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands. In terms of ranking Option G performs least well given its distance from the town centre, services and facilities. It is not possible to differentiate between Options H and I at this stage, as both connect well with the town centre and existing communities on the outskirts of the settlement.</p>		

⁷⁵ Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

ISA Theme: Health and wellbeing

Options	Option G	Option H	Option I
Rank	1	1	1
Significant effect?	No	No	No
Discussion	<p>Monmouth does not include a hospital, however it is supported by Monnow Vale Community Hospital (Monnow Vale Integrated Health and Social Care Facility). This specialist hospital provides a range of Health & Social Care needs to people over the age of 65, and also includes access to many specialist Clinics. Option H is best located in terms of access to the Community Hospital, followed by Option G, with Option I least well performing, located 1.3 miles/ 28 minute walking distance away. All Options therefore have good access to the Community Hospital. In terms of GP surgeries, there are two located within Monmouth; Dixon Surgery and Castle Gate Medical Centre. Option I is 800m/ 18 minute walk from Dixon Surgery, while Options G and H are a 900m/ 18 minute walk, and a 0.7 mile/ 14 minute walk from Castle Gate Medical Practice, respectively. All Options therefore perform positively in terms of access to local health facilities. Given the specialist nature of Monnow Vale Community Hospital, it is considered that residents would travel to Nevill Hall Hospital in Abergavenny for wider hospital services. All Options are approximately 18 miles from Nevill Hall Hospital.</p> <p>Access to sustainable transport throughout Monmouth is reasonable; Monmouth has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466), which is likely to be utilised by residents. Option I notably has good access to the A40 and A466. There is no railway station located within Monmouth; the nearest being Abergavenny railway station, approximately 16 miles west of all Options. Monmouth does however have a range of bus services which connect residents with the South Wales cities and to Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixon Road.</p> <p>The town is in close proximity to Kings Wood to the west, and it is noted that Option G is adjacent to the Offa's Dyke Path along Watery Lane, which connects the Option to the Wood. Option G therefore performs positively in terms of access to walking and cycling, in addition to recreational activities at Kings Wood.</p> <p>Overall, all Options perform positively in relation to the Health and wellbeing ISA theme. It is difficult to differentiate between the Options at this stage, with all options providing residents with good access to health services, and supporting accessibility by healthy forms of transport.</p>		

ISA Theme: Equalities, diversity and social inclusion

Options	Option G	Option H	Option I
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>Monmouth is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Monmouth will lead to positive effects on new and existing residents' quality of life, creating more positively integrated communities. In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD) looking at Monmouth, and specifically the growth Options:</p> <ul style="list-style-type: none"> • Option G is within the 60% - 80% least deprived LSOAs in Wales; • Option H is within the 60% - 80% least deprived LSOAs in Wales; and • Option I is within the 80% - 100% least deprived LSOAs in Wales. <p>As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting more deprived communities through Options G and H (albeit not significantly more deprived), positive effects are likely to be enhanced to some degree. It is recognised that Option G also has the potential to deliver positive effects through reducing inequalities between sub-urban and urban areas, expanding upon Over Monnow, the sub-urban part of Monmouth. Over Monnow is located to the west of the River Monnow and the Monnow Bridge, and identified as the third most deprived LSOAs in Monmouthshire (Overmonnow 2, ranked 520). Option I is also likely to lead to positive effects in this respect, directing growth towards rural Dixton village, located 1 mile north east of Monmouth.</p> <p>In terms of ensuring access to services for more vulnerable or immobile groups in the community, such as elderly residents and young families, Option H performs most positively. This is given its central location adjacent to the town centre (approximately 0.5 miles /11 minute walk away). Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or a 13 minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk.</p> <p>Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. In terms of ranking the Options, Option G and H are likely to deliver positive effects of greater significance than Option I as growth is targeted towards more deprived areas. Option H however is best located in terms of supporting vulnerable groups with access to services in the town centre, and Options G and I perform well through reducing inequalities between sub-urban and urban areas to the north and southeast of the town. It is therefore not considered possible to differentiate between the Options at this stage.</p>		

ISA Theme: Transport and movement

Options	Option G	Option H	Option I
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>In terms of the strategic transport network, Monmouth occupies a key location on the road network, with strategic links between Newport (A449), Abergavenny (A40) and the Midlands (A466). While levels of self-containment are high in Monmouth, there remains a reliance on the car as the primary mode of transport, with high levels of through traffic highlighted as a significant issue for the town. Option I is best located in terms of access to the strategic road network; notably being nestled between the A40 and A466. Options G and H have good access to the A40, to the east. It is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.</p> <p>Access to sustainable transport throughout Monmouth is reasonable. Although the town is not connected to the rail network (the nearest being Abergavenny railway station, approximately 16 miles west of all Options), it has good bus services to the South Wales cities and into Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixon Road.</p> <p>All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.</p> <p>Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options are well located in terms of the bus network which is well connected with wider service centres. Option I is worst performing of the Options given its location between two A-roads which currently experience high levels of traffic and congestion at peak times. However, it is considered that all Options would utilise the strategic road network to some extent, particularly given the absence of a railway station. It is therefore considered that Options cannot be differentiated between at this stage.</p>		

ISA Theme: Natural resources (air, land, minerals and water)

Options	Option G	Option H	Option I
Rank	1	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. All Options are considered to perform equally in this respect, given all Options direct growth towards a Tier 1 settlement, with good access to the strategic transport network and town centre; supporting modal shift to reduce reliance on the car and subsequently reduce NO₂ emissions. However, given the absence of a railway station and the strategic road links to Newport (A449), Abergavenny (A40) and the Midlands (A466), there is likely to be a continued reliance on the private vehicle for travel.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2017).⁷⁶ The area containing Option I was found to be entirely Grade 2, and the area containing Option H was found to be entirely Grade 3a. The area containing Option G however was found to be partially Grade 3a and partially Grade 3b. Option G is therefore best performing of the Options, given it includes a reduced amount of BMV agricultural land.</p> <p>All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Option G is best performing in relation to protecting the County's soil/ land resource.</p> <p>None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.</p> <p>Overall, all Options are considered to perform equally in terms of impact on air quality, and the County's mineral and water resource. However, all Options perform negatively against this ISA theme overall with the potential for significant effects, as all Options would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. In terms of ranking the Options, Option G is best performing given it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.</p>		

⁷⁶ The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

ISA Theme: Biodiversity and geodiversity

Options	Option G	Option H	Option I
Rank	1	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>In terms of European sites, it is recognised that the HRA screening (2021) of the Preferred Strategy policies found that potential residential or employment sites in Monmouth, are likely to have nutrient neutrality implications for the River Wye SAC, because they are served by WwTWs discharging into the upper reaches of the SAC. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated between given the level of development is considered equal across all options.</p> <p>In terms of differentiating between the options, the River Wye SAC is located approximately 600m east of Option I, approximately 1.2km east of Option H, and 1.4km east of Option G. Option I is also within 800m of the Wye Valley Woodland SAC. Taking each SAC in turn:</p> <ul style="list-style-type: none"> • The River Wye SAC covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey. • The Wye Valley Woodland SAC is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK. <p>In addition to the blanket water quality issue highlighted above for all options, the HRA Screening (2021) found that there is the potential for development to significantly affect the River Wye SAC through atmospheric pollution, recreation, and water quantity, level and flow, and for development to affect the Wye Valley Woodland SAC through atmospheric pollution. As such, these sites and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. Given the proximity of Option I to both SACs, it is considered that this Option has the potential to lead to negative effects of greatest significance.</p> <p>There is a range of nationally and locally designated biodiversity located around Monmouth. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow. Option I has the potential to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.</p> <p>Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are hedgerows/trees/ dense scrub extending along the field boundaries of Option G, and there is a corridor of mature trees running along the boundary of Option I. Therefore development at Option I, and to a lesser extent Option G, has the potential to lead to negative effects on biodiversity through direct loss of habitats and associated species present, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air</p>		

ISA Theme: Biodiversity and geodiversity

pollution. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing biodiversity where possible; delivering net-gain. This may include creating/ expanding upon ecological corridors and enabling habitat connectivity; notably through Option I.

Overall, all Options have the potential to lead to long term significant negative effects on biodiversity as a result of nutrient neutrality implications for the River Wye SAC. Additionally, all Options have the potential to adversely impact upon the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve to the east of the settlement. In terms of ranking the options, given the proximity of Option I to both SACs, and the biodiversity present at the Option itself, it is considered that this Option has the potential to lead to negative effects of greatest significance. It is considered that Options G and H perform similarly in relation to the biodiversity ISA theme. All Options have the potential to deliver positive effects through biodiversity enhancement/ net gain.

ISA Theme: Historic environment

Options	Option G	Option H	Option I
Rank	1	2	3
Significant effect?	Uncertain	Uncertain	Uncertain
Discussion	<p>There are no designated heritage assets within or in close proximity to Option G. This growth area is approximately 500m from the significant number of heritage assets present within the settlement and separated by the existing built up area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.</p> <p>There are no designated heritage assets within or adjacent to Option H. There are a number of listed buildings to the north east and east in close proximity to the River Monnow. To the south east of the growth area lies the Monmouth (Central) Conservation Area which includes a significant number of listed buildings. There are also a number of scheduled monuments, including Monmouth Castle. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth (Central) Conservation Area. However, this is uncertain at this stage.</p> <p>There are no designated heritage assets within Option I; however, there is the Monmouth (Dixton) Conservation Area to the south east which contains two scheduled monuments and five listed buildings. There are also three listed buildings to the north west on the other side of the A466. The boundary of the Monmouth (Central) Conservation Area extends up the A466 near the south of the growth area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth Central and Dixton Conservation Areas, listed buildings and scheduled monuments. However, this is uncertain at this stage.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.</p> <p>It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.</p> <p>Overall, Option G is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. It is not possible to identify any significant differences between Options H and I at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.</p>		

ISA Theme: Landscape

Options	Option G	Option H	Option I
Rank	1	2	2
Significant effect?	Uncertain	Yes-Negative	Yes - Negative
Discussion	<p>As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Monmouth, the area immediately south east of the settlement is the Wye Valley Area of Outstanding Natural Beauty (AONB). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be “<i>valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.</i>”⁷⁷ In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to “<i>Ensure all development within the AONB and its setting is compatible with the aims of AONB designation</i>”. Given the location of the Options to the west and north of Monmouth, it is not considered that any of the Options will impact on the AONB or its setting.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.</p> <p>It is also noted that Option H is considered to have a high amenity value and is designated in the current adopted LDP as an ‘Area of amenity importance’ under Policy DES2 (Areas of Amenity Importance). In accordance with Policy DES2 “<i>development proposals on areas of amenity importance will only be permitted if there is no unacceptable adverse effect on the visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces [...or...] linked areas of green infrastructure in terms of its contribution to the character of the locality</i>”. The delivery of Option H therefore has the potential to impact upon the important qualities of this area, with the potential for long term negative effects.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA’s sensitivity to residential development.⁷⁸ Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Monmouth. However, looking specifically at the Options in turn:</p> <ul style="list-style-type: none"> • Option G is categorised as high to medium landscape sensitivity to residential development. • Option H is categorised as high/medium sensitivity to residential development. • Option I is categorised as having a high/medium sensitivity to residential development. <p>Overall, Option G is less sensitive in terms of the landscape, and development in this area is therefore less likely to result in a residual negative effect compared to the other Options. Given uncertainties no significant differences between Options H and I in terms of the nature and significance of effects could be identified at this stage, and will likely be dependent on the precise scale, layout and design of growth. Furthermore, both options are identified as having high/medium sensitivity to development through the Landscape Sensitivity Update Study (2020), and are both constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an ‘Area of amenity importance’). Options H and I are therefore ranked equally, with the potential for negative effects. For all Options, mitigation (which reduces the extent of development to avoid</p>		

⁷⁷ Welsh Government (2018) Planning Policy Wales

⁷⁸ White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

ISA Theme: Landscape

(the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

ISA Theme: Climate change

Options	Option G	Option H	Option I
Rank	=	=	=
Significant effect?	Uncertain	Uncertain	Uncertain
Discussion	<p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p> <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO₂ emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.</p> <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.</p> <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform reasonably well in this respect through directing growth towards a Tier 1 settlement; however given the absence of a railway station, the existing high levels of congestion in the town and the presence of the often congested A40 and A466, there may be a continued reliance on the private vehicle for travel.</p> <p>In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Wye is a constraint throughout the centre of the town and in parts of Over Monnow. However, all Options are located away from areas at high risk of flooding, within Flood Zone A.</p> <p>Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, given the presence of the A40, A466, and absence of a railway station, there is likely to be a continued reliance on the car as the primary mode of travel. Effects on climate change are therefore uncertain.</p>		

Summary findings and conclusions for growth level options

ISA Themes	Rank/ significant effect	Categorisation and rank		
		Option G	Option H	Option I
Economy and Employment	Rank	2	1	3
	Significant effect?	No	No	No
Population and Communities	Rank	2	1	1
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	1	1
	Significant effect?	No	No	No
Equalities, diversity and social inclusion	Rank	=	=	=
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural Resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic Environment	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate Change	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

Summary findings:

No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.

All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.

All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Wye SAC. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.

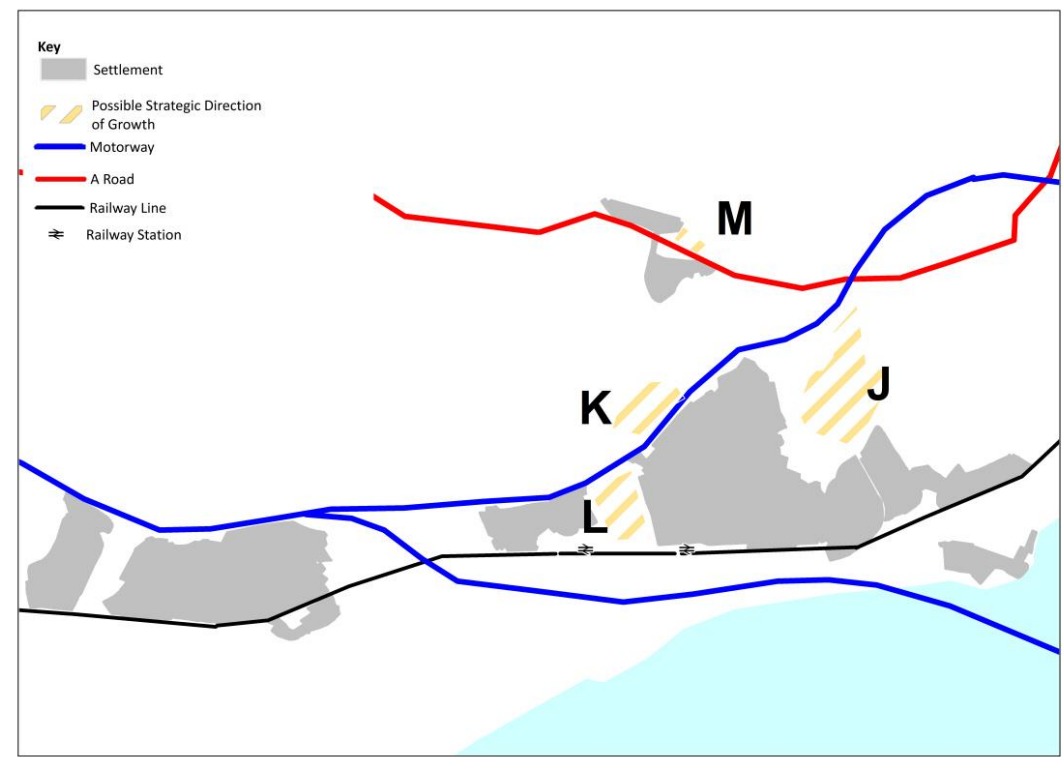
All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).

Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance').

The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of this riverine SAC will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gains, and enhancement of, designated assets.

For all Options, effects against Climate Change are uncertain at this stage.

Severnside



ISA Theme: Economy and employment

Options	Option J	Option K	Option L	Option M
Rank	2	2	1	3
Significant effect?	No	No	No	No
Discussion	<p>Severnside is a cluster of settlements identified within the RLDP sustainable settlement hierarchy. Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements which have functional transport links with the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick, which together are considered to share characteristics to make up the identifiable group of Severnside. The Severnside area has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, and as a whole is well located for the nearby employment markets of Newport, Cardiff and Bristol. There are key rail links to these employment markets with stations at Rogiet and Caldicot connecting with the key settlements of Cardiff in the West and Bristol /Cheltenham/Midlands in the east. There are also good road links to the M4 and M48 motorways, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the west, and Chepstow to the east. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.</p> <p>In terms of facilities and services present, Caldicot and Magor and Undy are identified as higher tier settlements and therefore provide the greatest range of services and facilities of all the Severnside settlements. Option L therefore performs most positively of the options, given it is 1 mile/ 19 minute walking distance from Caldicot town centre. Following this, Option K is approximately 1.4 miles, a walking distance of 26 minutes; and Option J is approximately 1.5 miles and approximately 30 minutes walking distance. Option M is 2.1 miles from Caldicot town centre, although it is appreciated there are some limited facilities, such as a Post Office, in the nearest settlement of Caerwent.</p> <p>Employment sites are present throughout the Severnside area. Notably, Severnside Industrial Estate is located to the south east of Caldicot, which is a significant employment base and separates Caldicot from neighbouring Portskewett. Options J and L are best performing in terms of access to this employment site, given these Options would extend the built settlement of Caldicot, south of the M48. Option K followed by Option M is less well located in this respect; however, they are still considered to be able to access the site. There is also land allocated for employment to the North West of Magor/ Undy with the established Magor Brewery site and Wales One Business Park. These sites are relatively distant from all Options; however, they still have the potential to be capitalised upon via the M48/M4 corridor.</p> <p>All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.</p> <p>Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option L is best performing as it is most centrally located in terms of access to services and facilities in Caldicot town centre, has good access to road links to the M4 and M48 motorways to access outside employment markets, and is within reasonable distance of employment opportunities to the south of the town. Option M performs least well of the Options given its poor access to Severnside centres, poor access to employment sites within Severnside, and limited potential to capitalise upon the strategic road network.</p>			

ISA Theme: Population and communities

Options	Option J	Option K	Option L	Option M
Rank	1	2	1	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.</p> <p>All Options will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the south of the County. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway station immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.</p> <p>In terms of integrating with existing communities/ settlements, Option L performs most positively as it would infill between Rogiet to the west and Caldicot to the east. Option J would also perform positively in this respect through extending Caldicot to the north east. However, while Options J and L have the potential to deliver positive effects in terms of promoting the growth of existing communities; Option L may also lead to the coalescence of Rogiet and Caldicot, with the potential for negative effects in terms of settlement/ community identity.</p> <p>Option K performs less well given the Option is detached from Caldicot by the M48, and therefore would likely be isolated to some extent from the existing settlement to the south. Residents would likely be reliant on the car to access services and facilities in Caldicot and would perform less positively than Options J and L in terms of supporting sustainable communities. This is also likely to be the case through growth at Option M, however, this option is arguably least well performing as it is in a less sustainable location, north of the M4 corridor. Option M would however likely positively integrate with Caerwent; delivering positive effects to this settlement through infrastructure delivery and subsequent improved accessibility.</p> <p>Overall, it is therefore considered that Option L, followed by Option J perform most positively in terms of enhancing the Severnside area, integrating with key settlements, and the opportunity to utilise opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option K, while adjacent to the M48/ M4 strategic transport network and in close proximity to Caldicot, performs less well as it is severed from the community by the motorway. Option M performs least well given its relative detachment from the M4 corridor and the main town of Caldicot; and subsequent reduced potential to deliver sustainable communities.</p>			

ISA Theme: Health and wellbeing

Options	Option J	Option K	Option L	Option M
Rank	2	2	1	3
Significant effect?	No	No	No	No
Discussion	<p>There are two GP surgeries located within the Severnside area within close proximity to the Options; Gray Hill Surgery and Portskewett Surgery. Options J, K and L are all within 1km / 20 minute walk of a GP practice, while Option M is 2.4 miles (drive) from Portskewett Surgery.</p> <p>In terms of wider health facilities, the Royal Gwent Hospital and St Joseph's Hospital are located in Newport; approximately 12 miles from Options K and L, 13 miles from Option M, and 15 miles from Option J. In terms of specialist needs; St Peter's Hospital is 5 miles from Option M and 7 miles from Options J-L, on the outskirts of Newport. St Peter's is a centre for the assessment, treatment and rehabilitation of individuals with a wide range of complex neurodegenerative and organic disorders. Option M is worst performing in terms of access to a GP, while all Options perform on a par in terms of access to a hospital and wider health services.</p> <p>Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements which have functional transport links. The Severnside area, has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, providing access to Newport, Cardiff and Bristol. Railway stations at Rogiet and Caldicot connect with the key settlements of Cardiff in the west and Bristol/ Cheltenham/ Midlands in the east. Option L is best located in terms of access to Caldicot railway station and the Severn Tunnel Junction at Rogiet; being 0.5 miles/ 10 minute walking distance from the Caldicot station. Option K is 800m from Caldicot station, however this would involve crossing the M48. Option J is 1.1 mile / 22 minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245m detached by the Country Park.</p> <p>While not sustainable transport options, it is worth noting that there are good road links from the Options to the M4 and M48 motorways; including the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the West, and Chepstow to the East. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south..</p> <p>Options located in close proximity to the motorway also have the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e. through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant.⁷⁹ Options L and K perform most negatively in this respect given their location adjacent to the motorway. However it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.</p> <p>Overall, Option L performs particularly well in terms of proximity to health services, and supporting healthy forms of transport to reach health (and wider) services/ facilities /employment. Options J and K perform relatively on a par against this ISA theme, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from health facilities and sustainable travel opportunities in the key Severnside settlements (namely Caldicot).</p>			

⁷⁹ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>

ISA Theme: Equalities, diversity and social inclusion

Options	Option J	Option K	Option L	Option M
Rank	2	3	1	4
Significant effect?	No	No	No	No
Discussion	<p>Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. Positive effects are predicted for residents' quality of life, creating more positively integrated communities.</p> <p>In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD) looking at Severnside area, and specifically the growth Options:</p> <ul style="list-style-type: none"> • Option J is within the 80% - 100% least deprived LSOAs in Wales; • Option K is within the 60% - 80% least deprived LSOAs in Wales; • Option L is predominately within the 60% - 80% least deprived LSOAs in Wales. The east of the Option falls within the 20% - 40% most deprived LSOAs; and • Option M is within the 60% - 80% least deprived LSOAs in Wales. <p>As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing; however, it is considered that by targeting the most deprived communities through Option L, positive effects are likely to be enhanced to some degree.</p> <p>Option J itself is the least deprived of the Options, and will likely deliver increased positive effects through reducing inequalities between sub-urban and urban areas; expanding upon Portskewett village located to the east of Caldicot.</p> <p>Options that are well located in terms of sustainable settlements also perform positively through ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, and especially those without access to private vehicles. Option L is best performing in this respect given its location nestled between two existing communities that are well supported in terms of infrastructure provision and sustainable travel opportunities. Options J and K also perform positively in this respect; however, it is noted that Option J is slightly detached from the main centre, and Option K is detached from existing communities by the M48. Option M performs least positively given it is not well connected with sustainable centres, services and facilities.</p> <p>Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, positive effects are likely to be less significant through Option M, given its comparative detachment from the Severnside area. Option L is predicted to lead to positive effects of greatest significance through targeting deprived areas to the east of the Option. This will promote equality, developing more inclusive communities in a sustainable location.</p>			

ISA Theme: Transport and movement

Options	Option J	Option K	Option L	Option M
Rank	2	2	1	3
Significant effect?	No	No	No	No
Discussion	<p>In terms of the strategic transport network, the Severnside area has an important role as the gateway to Wales on the M4, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with Newport to the West, and Chepstow to the East. Levels of self-containment throughout the Severnside area are very low, holding the characteristics of a 'dormitory' area with high amounts of out-commuting and reliance on the car as the primary mode of travel. There are however, more recently, significant employment bases present at Magor, Undy, Rogiet and Portskewett; increasing traffic levels throughout the settlements and across the M4 corridor. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 to the west of Magor Undy. Option M is the least well connected given its distance, comparatively, from the M4 corridor.</p> <p>Given the location of all Options to the south of the County, it is considered that development under all Options is likely to result in increased vehicular use throughout the Severnside area, with the potential for long term negative effects. However, it is noted that all Options will deliver long term positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic transport links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County.</p> <p>Access to sustainable transport throughout the Severnside area is good. Caldicot and Rogiet (at Severn Tunnel Junction station) have rail links to Newport and Cardiff to the west and Bristol/ Cheltenham/Midlands in the east. Option L is best located in terms of access to Caldicot station, being 0.5 miles/ 10 minute walking distance away. While Option K is within 800m of the station, this would involve crossing the M48, and is therefore not seen to be particularly accessible. Option J is 1.1 mile/ 22 minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245 detached by the Country Park. Option L therefore performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within Caldicot and Rogiet, and for wider commuter journeys.</p> <p>All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.</p> <p>Overall, all Options perform well against this ISA theme, directing growth towards the south of the County and more specifically around the M4 corridor, capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot and Rogiet) and the wider M4 corridor.</p>			

ISA Theme: Natural resources (air, land, minerals and water)

Options	Option J	Option K	Option L	Option M
Rank	2	2	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option L is best performing in this respect, given its sustainable location nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure (such as the Severn Tunnel Junction station) and encourage modal shift. Option M performs least positively given it is detached from sustainable transport along the M4 corridor and within/ surrounding Caldicot, with high reliance on the car for travel anticipated.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2017).⁸⁰ The area of all Options is predominately Grade 1 agricultural land. The exception to this is approximately 1/3 of Option K which is Grade 3b land; and Option L includes areas of Grade 2, Grade 3b and Grade 4 land to the north east of the Option. Options L and K are therefore best performing in this respect as they would necessitate the least amount of loss of BMV land.</p> <p>All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Options L and K perform better than Options J and M in relation to protecting the County's soil/ and resource.</p> <p>Monmouthshire's mineral resource is focused to the south of the County, with part of Option M and Option K falling within a limestone minerals safeguarding area. Options J and L are therefore best performing in terms of protecting the County's mineral resource; however, in accordance with national and regional policy requirements, it is considered that a sustainable approach will be adopted to development within mineral safeguarding areas.</p> <p>All Options are considered to perform equally in terms of demand for water, and impact on water quality.</p> <p>Overall, all Options perform negatively against this ISA theme given development at each option would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing given it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage; and is not located within a minerals safeguarding area. It is difficult to differentiate between all other Options at this stage.</p>			

⁸⁰ The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

ISA Theme: Biodiversity and geodiversity

Options	Option J	Option K	Option L	Option M
Rank	3	2	3	1
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>In terms of European sites, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA)/ Ramsar site are located 900m south of Option L, 1.2km south of Option J, and over 2km from Options K and M. The Severn Estuary is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.</p> <ul style="list-style-type: none"> • Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl. • Primary reasons for Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity. • This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn. <p>HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Severn Estuary SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow; and for development to affect the SPA/ Ramsar site through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow. As such, the Severn Estuary, and potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SAC/ SPA/ Ramsar site. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. However, given the distance of the Options to the SPA/ SAC/ Ramsar site; it is considered that only Options L and J have the potential to lead to significant effects.</p> <p>There is a range of nationally and locally designated biodiversity located around the Severnside area. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the Severn Estuary SSSI through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow.</p> <p>Options J and K are constrained by Ancient Woodland at Farthing Hill (adjacent to Option J) and Woodland Valley (to the north east of Option K). There is the potential for development at Options J and K to adversely impact upon biodiversity present at Farthing Hill and Woodland Valley through increased disturbance, noise, light and air pollution. There is also the potential to deliver positive effects through biodiversity net-gain, this may include creating ecological corridors and aiding connectivity between sites.</p> <p>Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, Option K includes scattered pockets of hedges/ dense scrub and linear tree/ hedgerow habitats. It is noted that Dewston Garden and Grottoes Park is located</p>			

ISA Theme: Biodiversity and geodiversity

adjacent to the site to the west, which is rich in biodiversity and may hold connectivity with biodiversity present within the Option. In terms of Option M, mature trees/ hedgerows densely line the site boundary to the south along the A48, and there is a patch of woodland to the east of the site further along the A48 extending north. Option L also has hedgerows lining the field parcels within the Option, and there are sparse mature trees present throughout Option J. There is the potential for development across the Options to lead to negative effects on biodiversity through direct loss of habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain. Notably Options have the potential to strengthen connectivity across the Options and with the wider biodiversity network.

Overall, all Options have the potential to lead to adverse effects in terms of the biodiversity ISA theme. Options L and J have the potential to lead to significant adverse effects on biodiversity, given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. In terms of wider biodiversity effects, it is considered that Option K performs less well than other Options given the close proximity of Woodland Valley (Ancient Woodland), the presence of Dewston Garden and Grottoes Park adjacent to the Option, and the variety of biodiversity present within the Option itself. Option J is also constrained in terms of Ancient Woodland located adjacent to the Option at Farthing Hill, however, holds limited biodiversity within the Option. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

ISA Theme: Historic environment

Options	Option J	Option K	Option L	Option M
Rank	3	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>There are no designated heritage assets within Option M; however, it is in close proximity to the Caerwent Conservation Area, Caerwent Roman City Scheduled Monument and a number of listed buildings. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area. However, this is uncertain at this stage. The Option is separated from the heritage assets by the A48 and is also adjacent to existing residential development, which should help to reduce impacts as a result of development in this area.</p> <p>Development at Option K would extend the settlement of Caldicot to the North West, which would cross the boundary of the M48 motorway and encroach upon designated heritage settings in Caerwent, including the Caerwent Conservation Area. The Dewstow House Historic Park and Garden, which contains four listed buildings is located adjacent to the growth area in the south-west and development here has the potential to directly affect its setting, particularly though loss of greenfield land which is likely to contribute to the character of this area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area and Dewstow House Park. However, this is uncertain at this stage.</p> <p>Development at Option J would likely lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. Development within this growth area would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. On this basis, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified; however, there is some uncertainty at this stage.</p> <p>There are no designated heritage assets within Option L, which is also largely contained by the M48 in the north, railway line in the south and existing urban areas in the east and west. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.</p> <p>In summary, Option L is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. Whilst uncertainties exist, Option J is considered to have greater potential for significant residual negative effects. It is not possible to identify any significant differences between Options K and M at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.</p>			

ISA Theme: Landscape

Options	Option J	Option K	Option L	Option M
Rank	3	3	2	1
Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Discussion	<p>As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at the Severnside area, while the area is not constrained by international or national landscape designations, it is noted that the west of Caldicot is separated by an important Green Wedge from Rogiet. This Green Wedge covers Option L, and it is therefore considered that development at this location could lead to coalescence between these two settlements; affecting the degree of physical and visual separation, as well as the visual impact upon the surrounding landscape.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.⁸¹</p> <p>Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Caldicot and Magor & Undy, as higher tier settlements within the Severnside area. However looking specifically at the Options in turn:</p> <ul style="list-style-type: none"> • Option J is categorised as having a high-medium sensitivity to residential development. • Option K is categorised as having a high-medium sensitivity to residential development. • Option L is categorised as having a medium sensitivity to residential development. • Option M is categorised as having a medium-low sensitivity to residential development. <p>Development of Option M would likely extend the settlement of Caerwent to the east, north of the A48. Development would significantly increase the size of Caerwent, altering the character of the settlement and village identity, and may set precedent for further growth to the east, along the A48.</p> <p>Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the character and setting of the settlement and wider landscape, depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity and Capacity Study (2009) findings. Option J and Option K are identified as worst performing of the Options, given both have medium-high sensitivity to housing development. Option K would likely lead to negative effects through extending development northwest of the M48 into the open landscape, which currently acts as a physical barrier to development. Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L performs more strongly than Options J and K as it is considered to have medium sensitivity to residential development. However development of Option L could lead to coalescence between Caldicot and Rogiet, which may result in the loss of a multi-functional open space and designated 'Green Wedge'. Option M may also set precedent for further development in the open landscape to the east along the A48, however is of medium-low sensitivity to development, and therefore is best performing of the options.</p>			

⁸¹ White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

ISA Theme: Landscape

	It is noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.
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ISA Theme: Climate change

Options	Option J	Option K	Option L	Option M
Rank	1	1	3	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p> <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO₂ emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.</p> <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure. However, it is noted that Option L is an area of open green space, defined as a 'green-wedge'. The loss of this area of green infrastructure has the potential to lead to negative effects in terms of climate change adaptation.</p> <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards the South of the County; capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro, as discussed above. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet with good access to the town centre, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option L performing least positively. This is given that in comparison to other Options, Option L is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot) and the wider M4 corridor. It is however noted that the utilisation of the M4 itself will result in continued high car use in the County.</p> <p>In terms of managing flood risk to address climate change, it is recognised that the Severn Estuary is located along the south of the County. While the majority of Options are not constrained in this respect, the southern extent of Option L is located within Flood Zones B and C. It is however noted that development of Option L could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.</p> <p>Overall, development proposed at the individual Growth Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, capitalising upon strategic transport links to the south of the County; however, it is noted that the utilisation of the M4 corridor will result in continued high car use. As such, effects on climate change in this respect are uncertain. While Option L is best performing in terms of access to sustainable travel, Option L performs poorly due to high risk of flooding, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line</p>			

ISA Theme: Climate change

	with higher tier planning policy and guidance via the PPW and Technical Advice Note 15. Option M also performs less well than other Options given its detachment from sustainable transport opportunities surrounding Caldicot and Rogiet, and subsequent likely reliance on the private vehicle for travel.
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Summary findings and conclusions for spatial strategy options

ISA Themes	Rank/ Significant effects	Categorisation and rank			
		Option J	Option K	Option L	Option M
Economy and Employment	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Population and Communities	Rank	1	2	1	3
	Significant effect?	Yes – Positive	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Equalities, diversity and social inclusion	Rank	2	3	1	4
	Significant effect?	No	No	No	No
Transport and movement	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Natural Resources	Rank	2	2	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	2	3	1
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	3	2	1	2
	Significant effect?	Uncertain	Uncertain	No	Uncertain
Landscape	Rank	3	3	2	1
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Climate Change	Rank	1	1	3	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

Summary findings:

All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good - reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network. Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres, services and facilities; and relatively limited potential to capitalise upon the strategic road network.

In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities and the strategic road network/ sustainable transport opportunities.

All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.

In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.

Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having 'medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L holds medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated 'Green Wedge'. Option M is best performing in this respect, although there remains the potential for residual minor negative effects.

The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage, and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gain, and the enhancement of designated assets.

Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage.

