

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

Initial ISA Report - Non-Technical
Summary

Monmouthshire County Council

November 2022

Quality information

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Introduction

1. Introduction

- 1.1 AECOM is commissioned to lead on an 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).
- 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 development 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.
- 1.4 The Initial ISA Report and this Non-Technical Summary is published alongside the RLDP Preferred Strategy. Any representations received will be taken into account and a revised ISA Report and Non-Technical Summary will be published subsequently alongside the Deposit RLDP.
- 1.5 ISA reporting essentially involves answering the following questions in turn:
 - What has plan-making/ ISA involved up to this point?
Including in relation to 'reasonable alternatives'.
 - What are the appraisal findings at this current stage?
i.e. in relation to the Draft Plan (i.e. the Preferred Strategy).
 - What happens next?
What steps will be taken to finalise (and monitor) the plan?
- 1.6 Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the questions i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

What is the RLDP seeking to achieve?

- 1.7 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 becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life.

- 1.8 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.

Vision

- 1.9 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, key elements of the PSB Well-being Plan and draft Community and Corporate Plan and to reflect the new growth and spatial strategy.

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, equal, safe, 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, ambitious and well-connected County.***
- 3. The best of the County's built heritage, countryside, biodiversity, 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, supporting our ambitions for a zero carbon county.***

The implications of achieving this Vision will be that by 2033 Monmouthshire will be home to well-connected exemplar, affordable housing-led, net zero carbon ready places that provide employment and support demographically balanced sustainable and resilient communities for all.

Objectives

- 1.10 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 are kept under review and updated as necessary as part of the continued development of the RLDP evidence base.
- 1.11 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 RDLP objectives

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ¹	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	Town and Local centres*	To sustain and enhance the County's market towns of Abergavenny, Chepstow, Monmouth, Caldicot, and local centres of Usk and Magor as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	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 Infra-structure, Biodiversity and Landscape*	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and well-being. 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.	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, including the use of natural flood management measures to appropriately manage flood risk and 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.

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

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ¹	Main PPW11 theme	PSB Well-being plan objective
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.
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. support the adaptation and re-use of existing sustainably located buildings. 	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. To support the Health Board to improve health infrastructure to meet community needs.	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, creating a more balanced demography and socially and economically sustainable communities.	2, 3, 4, 5, 24	Active and social places	Respond to the challenges associated with demographic change.

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ¹	Main PPW11 theme	PSB Well-being plan objective
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 create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; 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.
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 affordable homes and 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 above use of the private car.	10, 30, 36	Active and social places	Develop opportunities for communities and business to be part of an economically

RLDP Objective Number	Headline	RLDP Objective	RLDP issues addressed ¹	Main PPW11 theme	PSB Well-being plan objective
					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 and Nature Emergency*	To strive to limit the increase in global temperatures to 1.5oC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero ready homes, 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

What is the scope of the ISA?

1.12 The scope of the ISA is essentially reflected in a list of sustainability objectives, developed subsequent to a ‘scoping’ process (which included consultation on the scope of the SA in 2018). Taken together, these objectives indicate the parameters of ISA, and provide a methodological ‘framework’ for appraisal.

Table 1.1: ISA framework

ISA theme	ISA objective
Economy and Employment	To promote economic growth and maximise the economic contribution of the area to the Cardiff City Region, strengthening and diversifying the economy, promoting tourism, enhancing the vitality and viability of town centres and increasing prosperity for all.
	To increase levels of local employment and ensure distribution of opportunities, whilst improving educational attainment and increasing skill levels
Population and Communities	To provide a sufficient quantity of good quality market and affordable homes in sustainable locations to meet identified needs.
	To enhance design quality to create great places for people.
Health and well-being	To improve the health and well-being of the population including physical and mental health, social well-being and community safety.
Equalities, diversity and social inclusion	To reduce poverty and inequality; tackle social exclusion, fair work ambitions, and promote community cohesion.
Transport and Movement	To improve access for all to the jobs, services and facilities they need whilst supporting a reduction in the use of private transport by promoting active travel and encouraging modal shift to sustainable transport, and improving access to high quality digital communications and utilities.
Natural Resources (Air, Land, Minerals and Water)	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting where possible higher grade agricultural land.
	To promote the circular economy by reducing waste generation and maximising reuse and recycling, ensuring the use of natural resources and the provision of an adequate supply of minerals.
	To conserve, protect and enhance the water environment, water quality and water resources.
Biodiversity and Geodiversity	To conserve, protect and enhance biodiversity and geodiversity interests 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 landscape.
Climate Change	To mitigate and adapt to the effects of climate change through increasing energy efficiency and generation and use of low carbon and renewable energy sources.
Flood Risk	To reduce and manage the risk of flooding.

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

2. Plan-making/ ISA up to this point

- 2.1 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 2.1 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.²

Table 2.1 RLDP and ISA 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
Preferred Strategy Public consultation from July to August 2021	Initial ISA Report and NTS Public consultation from July to August 2021
	ISA of the revised growth and spatial options October 2022

- 2.2 This part of the NTS sets out the work undertaken in 2018-2022 that led to the development of the Preferred Strategy document that is currently the focus of appraisal (see Part 2, below) and 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

² <https://www.monmouthshire.gov.uk/planning-policy/local-development-plan-revision/>

reasonable alternatives, and how the Council then took into account appraisal findings when finalising the draft plan for publication.

- 2.3 This part of the report presents information regarding the consideration of reasonable alternatives. This information is important given regulatory requirements.³

Establishing the reasonable alternatives

Level of growth

Initial ISA of growth options (March 2020)

- 2.4 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.
- 2.5 The Council took time to consider the options, consultation responses received, and informal feedback from Welsh Government officials; which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs. A decision was subsequently taken to commission Edge Analytics to model an additional demographic-led scenario. This scenario sought 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.
- 2.6 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)

- 2.7 The Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.
- 2.8 As set out in PPW11, 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, form a fundamental part of the RLDP evidence base. These should be considered

³ 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.

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.

- 2.9 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.
- 2.10 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.⁴
- 2.11 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 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.
- 2.12 The six growth options identified in the Growth and Spatial Options Paper (December 2020)⁵ were assessed through the ISA in early 2021. The assessment of these options is presented in the Initial ISA Report which accompanied the consultation on the ‘Sustainable and Resilient Communities Preferred Strategy’ in Summer 2021.⁶

Revised growth options (October 2022)

- 2.13 Following consultation on the Preferred Strategy, a number of challenges have arisen which have impacted on the progression of the RLDP and require further consideration. In terms of the level of growth, this specifically refers to Welsh Government (WG) raising significant concerns regarding the proposed level of growth and the Strategy’s ‘general conformity’ with policies 1 and 33 of Future Wales: the National Plan 2040. This suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport, and the Valleys.
- 2.14 WG’s consultation response took the unprecedented step of prescribing a maximum growth of 4,275 dwellings for Monmouthshire to 2033. This is considerably lower than the Preferred Strategy dwelling requirement that was consulted on (7,605 dwellings) and would result in barely any new housing allocations over RLDP period due to the existing housing landbank.
- 2.15 MCC consider that this approach would fail to deliver on key locally evidenced issues and objectives including affordable housing delivery, economic growth/prosperity and rebalancing the demography, to the detriment of the

⁴ <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

⁵ 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/>

⁶ AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan <https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>

sustainability of the County Borough's communities. MCC also feel it would fail to accord with policies 4, 5 and 7 of Future Wales 2040: the national plan (FW2040) which specifically support rural communities and seek to increase the delivery of affordable homes throughout Wales (Appendix 1).

- 2.16 On 14th December 2021, a special meeting of the Council's Economy and Development Select Committee considered the implications of the WG Planning Division's response on Monmouthshire's communities and on addressing the locally evidence-based outcomes and objectives.
- 2.17 MCC consider that the WG letter poses a significant challenge for the Preferred Strategy. Namely, that an amended RLDP that follows the letter's requirements would not meet the tests of soundness at examination because it would not address the evidenced based issues or achieve the outcomes. Conversely, proceeding as originally proposed would be a high risk strategy.
- 2.18 Consequently, MCC have considered revised growth options which support lower dwelling requirements. These options are the subject of this ISA, alongside the growth strategy consulted on in 2021. The three options are presented in Table 2.1 overleaf.

Table 2.1 2022 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
Existing Preferred Strategy growth <i>Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R), AH)</i>	Demographic	12,443	13.2%	1,216	7,255	18.1%	507	7,605	481	7,215
Demographic led strategy for the LPA area <i>Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R)</i>	Demographic	9,480	+10.9%	930	5,160	+14%	360	5,400	416	6,240
WG prescribed growth <i>Dwelling-led (WG prescribed 285 dpa)</i>	Dwelling	8,050	+9.3%	830	3,900	+10.6%	285	4,280	286	4,290

Location of growth

Initial ISA of spatial options (March 2020)

2.19 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)

2.20 As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process in 2020 following the publication of the corrected Welsh Government 2018-based population and household projections (August 2020). The RLDP spatial options considered in 2019 were 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 options were since 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, focusing growth in the North of the County, was subsequently included as a result of consultation responses on the 2019 Growth and Spatial Options.

2.21 A total of four broad Spatial Distribution Options were therefore taken forward as realistic options for ISA in late 2020/ early 2021. The assessment of these options is presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.^{7,8}

Revised spatial options (October 2022)

2.22 Following consultation on the Preferred Strategy, a number of challenges have arisen which have impacted on the progression of the RLDP and require further consideration. In terms of the spatial strategy, this specifically refers to the environmental impacts of phosphate in watercourses.

2.23 In light of new evidence, Natural Resources Wales (NRW) has adopted tighter targets for the water quality of watercourses and conducted an assessment of the nine riverine Special Areas of Conservation (SAC) in Wales. This assessment has established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the

⁷ 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/>

⁸ AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan <https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>

river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.

- 2.24 In response, NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. This issue affects the upper (non-tidal) parts of the two rivers.
- 2.25 The phosphates water quality issue affecting the River Wye and River Usk has implications for the progression of the RLDP as the Preferred Strategy that was consulted on in July-August 2021 directed future growth to a number of key sustainable settlements within these affected catchment areas. Further consideration has, therefore, been given as to how the RLDP can progress in light of this issue, carefully balancing the need for growth with the climate and nature emergency.
- 2.26 Following discussions with Dŵr Cymru/Welsh Water (DCWW) and NRW, MCC have come to realise that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste Water Treatment Works (WWTW) (River Usk catchment), there is no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) at this time that will be implemented during the Plan period.
- 2.27 Without an identified deliverable solution, it will not be possible to demonstrate at examination that sites in the upper Wye catchment are deliverable, making the Plan unsound. This means that new site allocations for future growth cannot be directed to settlements within the affected Wye catchment area, including the primary settlement of Monmouth, until a feasible solution is identified that can be implemented within a timescale that facilitates development within the Plan period. The restrictions on new housing and employment development in this area during the Plan period has obvious implications for the RLDP spatial strategy.
- 2.28 Consideration has therefore been given to how to progress the RLDP having regard to the above challenges, whilst also ensuring that the RLDP delivers on the Council's objectives and core issues (see Chapter 2).
- 2.29 MCC have subsequently developed a spatial option which does not direct growth to settlements within the affected Wye catchment area, including the primary settlement of Monmouth. This option, alongside the spatial strategy consulted on in 2021, are the subject of this ISA. The two options are presented in Table 2.2 overleaf.

Table 2.2 2022 spatial strategy options

Spatial Option	Description
<p>Distribute growth proportionately across the County's most sustainable settlements</p>	<p>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 needs as identified in the LHMA, capacity for growth, and/ or the need for development to sustain the community.</p>
<p>Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot including Severnside, as well as some growth in our most sustainable rural settlements, excluding those settlements in the Upper Wye catchment area</p>	<p>Growth is focussed in the County's most sustainable settlements, including Abergavenny, Chepstow and Severnside, as well as some growth in our rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth WWTW within the Plan period, no new site allocations can be considered in settlements within the upper River Wye catchment area north of Bigsweir Bridge, including the primary settlement of Monmouth.</p>

Strategic growth areas

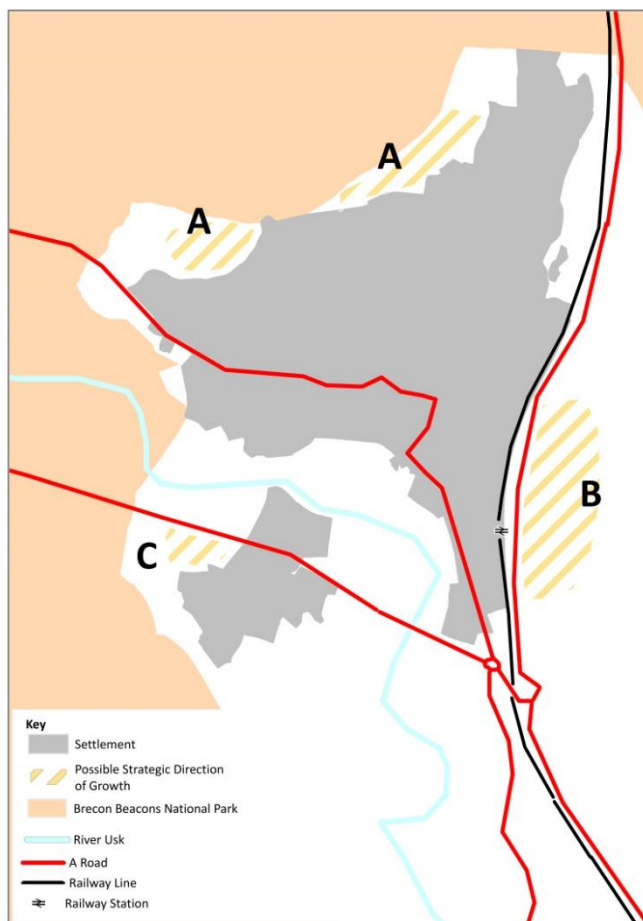
- 2.30 In 2020, the Council identified a number of potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a preliminary high-level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. Only strategic sites and sustainable urban extensions of around 8ha in size and above were considered.
- 2.31 The identified strategic growth areas were considered by the Council 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.
- 2.32 The potential strategic growth options, as identified overleaf, were assessed through the ISA in late 2020/ early 2021. The assessment of strategic growth areas is presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.
- 2.33 This assessment is reproduced in Appendix B of the main report.

Abergavenny and Llanfoist

2.34 Three possible strategic growth areas/ options for Abergavenny and Llanfoist were identified and are set out below and illustrated in Figure 2.3:

- 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 2.3 Abergavenny Strategic Growth Areas

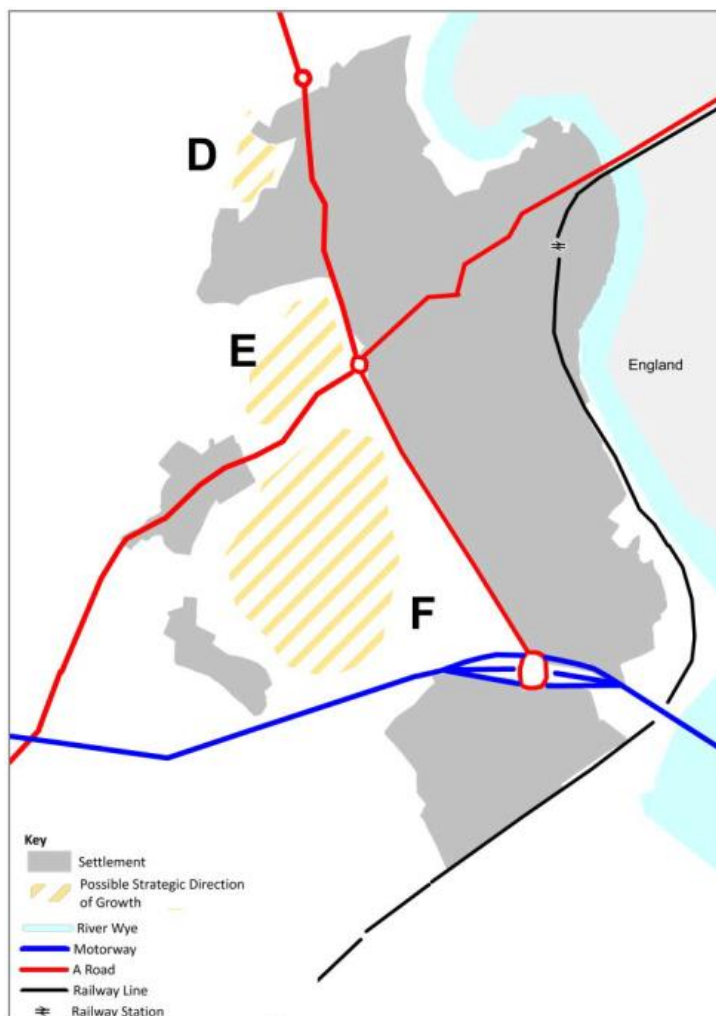


Chepstow

2.35 Three possible strategic growth areas/ options for Chepstow have been identified at this stage and are set out below and illustrated in Figure 2.4:

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

Figure 2.4 Chepstow Strategic Growth Areas

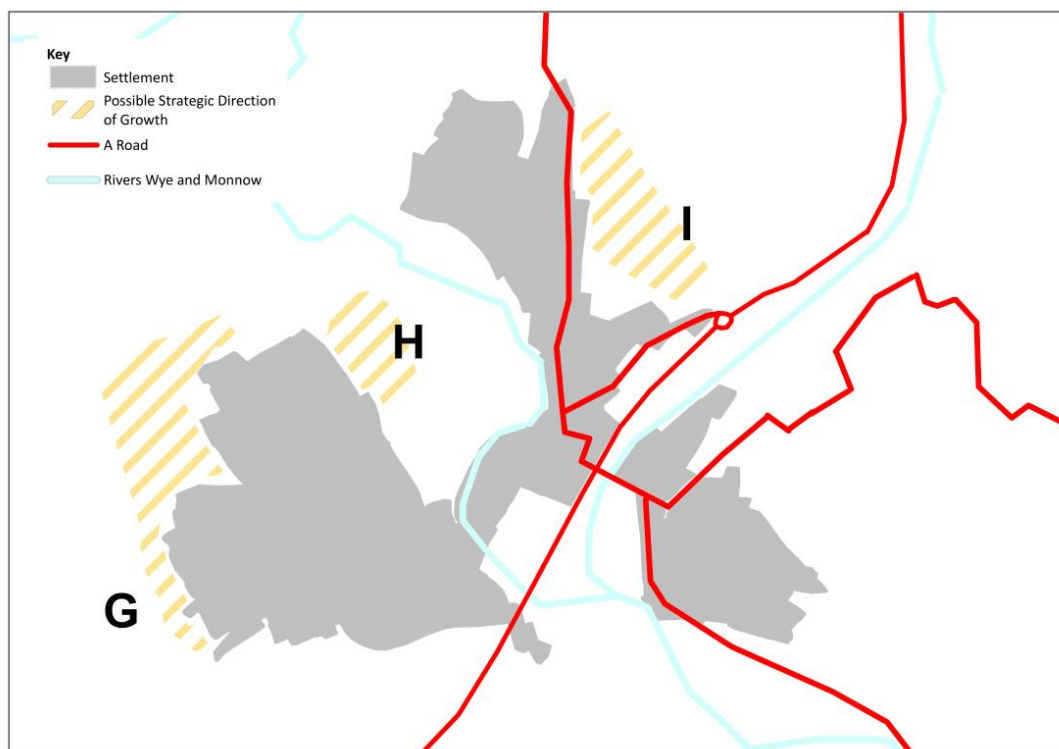


Monmouth

2.36 Three possible strategic growth areas/ options for Monmouth have been identified at this stage and are set out below and illustrated in Figure 2.5:

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

Figure 2.5 Monmouth strategic growth options

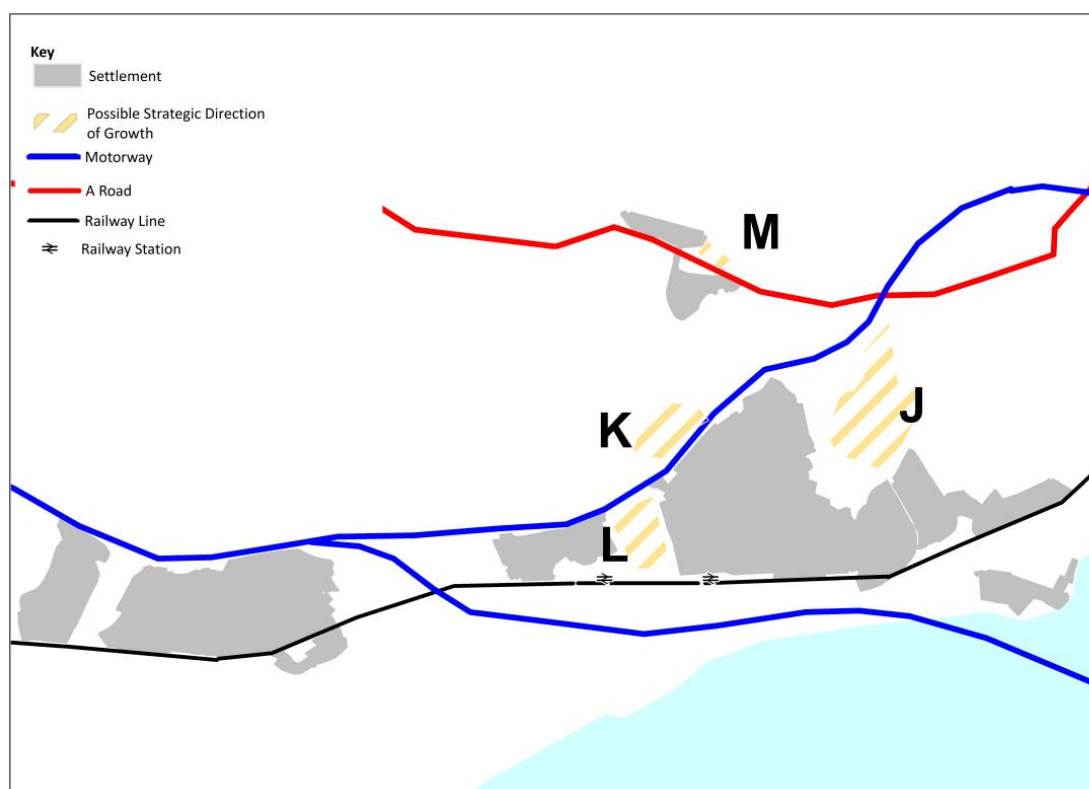


Severnside

2.37 Four possible strategic growth areas/ options for Severnside have been identified at this stage and are set out below and illustrated in Figure 2.6:

- 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 2.6 Severnside strategic growth areas



Appraising the reasonable alternatives

- 2.38 The strategic options identified above were subject to a comparative appraisal under each ISA theme and summary findings are presented below.
- 2.39 The assessment examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see Table 1.1) as a methodological framework. 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.

Level of growth

- 2.40 The three growth level options were subject to a comparative appraisal under each ISA theme and the summary findings are presented below.

Summary findings and conclusions for level of growth options

ISA theme	Rank/ significant effect	Categorisation and rank		
		Option 1	Option 2	Option 3
Economy and Employment	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Population and Communities	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Health and Wellbeing	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Equalities, Diversity and Social Inclusion	Rank	1	2	3
	Significant effect?	Yes - positive	Yes - positive	No
Transport and Movement	Rank	1	2	3
	Significant effect?	No	No	No
Natural Resources (air, land, minerals and water)	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Biodiversity and Geodiversity	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	3	2	1
	Significant effect?	Uncertain	Uncertain	Uncertain
Climate Change (including flood risk)	Rank	1	2	3
	Significant effect?	No	No	No

- 2.41 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 in these areas, and the potential mitigation measures available. The lowest growth option (Option 3) is ultimately ranked most favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development proposed through Option 1, followed by Option 2, have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.
- 2.42 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 (in the absence of known development locations). However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. The significance of the effects is likely to increase as the level of growth increases. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.
- 2.43 Similarly, for the transport ISA theme, Options 1 and 2 proposing a higher level of growth are more likely to result in impacts on the local road 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 pandemic is considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth Option 1, followed by Option 2, are ranked more favourably than Option 3 overall.
- 2.44 Option 3 is noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. However, there is a level of uncertainty, with effects unlikely to be significant in most cases. Particular concern relates predominantly to limited growth restricting opportunities to address a likely resultant demographic imbalance, which in turn would not support sustainable economic growth. Under this option, limited opportunities for the younger population to live and work in the County would negatively impact communities, exacerbating inequality and 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, under Option 3 there would be a limited opportunity to secure additional market or affordable housing, limiting the range and choice of homes (housing mix) which could drive up house prices and exacerbate affordability issues.

2.45 High growth Option 1 is identified as best performing 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. Option 2 performs slightly less positively than Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this Option, providing a more balanced demographic and more sustainable communities than predicted under Option 3.

Spatial strategy

The two spatial strategy options were subject to a comparative appraisal under each ISA theme. The summary findings are presented below.

ISA Themes	Rank/ Significant effects	Categorisation and rank	
		Option 1 - Distribute Growth Proportionately across the County's most Sustainable Settlements	Option 2 - Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot including Severnside, as well as some growth in our most sustainable rural settlements, excluding those settlements in the Upper Wye catchment area
Economy and Employment	Rank	1	2
	Significant effect?	Yes - Positive	Uncertain
Population and Communities	Rank	1	2
	Significant effect?	Yes - Positive	Uncertain
Health and Wellbeing	Rank	1	2
	Significant effect?	Yes - Positive	Uncertain
Equalities, Diversity and Social Inclusion	Rank	1	2
	Significant effect?	Yes - Positive	Uncertain
Transport and Movement	Rank	1	2
	Significant effect?	Uncertain	Uncertain
Natural Resources	Rank	=	=
	Significant effect?	Yes - Negative	Yes - Negative
Biodiversity and Geodiversity	Rank	2	1
	Significant effect?	Yes - Negative	Yes - Negative
Historic Environment	Rank	=	=
	Significant effect?	Uncertain	Uncertain
Landscape	Rank	2	1
	Significant effect?	Uncertain	Uncertain
Climate Change	Rank	2	1
	Significant effect?	Uncertain	Uncertain

- 2.46 The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment ISA theme, given that both options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects through 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.
- 2.47 Similarly, in relation to the biodiversity theme, it is considered that both options have the potential to adversely impact upon the County's biodiversity resource by directing development to areas that are sensitive in terms of internationally/ nationally designated biodiversity sites. However, effects have the potential to be greater under Option 1 given there would be new dwelling growth at the Primary Settlement of Monmouth, which has the potential to significant impact upon water quality in the River Wye SAC as a result of phosphorus loading. Option 2 excludes growth from the Upper Wye Catchment area, protecting the integrity of the SAC.
- 2.48 In terms of the landscape and climate change themes, Option 2 directs development to areas of lower flood risk and that are less sensitive in landscape designations and is therefore considered to perform better compared to Option 1. Option 1 directs growth to Monmouth, which has been identified as one of the most vulnerable settlements to flooding (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing). Option 1 also directs the highest level of growth in close proximity to the AONB and National Park, and therefore has a higher likelihood of negative effect arising than Option 2. However, given that the precise location of growth is not known, and further evidence base work is being carried out around landscape sensitivity, both options are found to have an uncertain effects in relation to the landscape and climate change themes.
- 2.49 In terms of natural resources, Option 2 performs most positively than Option 1 as no new allocations will be located within the Upper Wye River Catchment. However Option 1 performs most positively in terms of focusing growth within/ surrounding higher tier settlements, supporting active travel uptake and ensuring that air quality is not reduced throughout the County. It is therefore not possible to meaningfully differentiate between the options at this stage.
- 2.50 While both options perform well, Option 1 performs more positively than Option 2 against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. Option 1 is found to have the potential for significant long term positive effects, focusing growth at all of the County's 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 pandemic. Option 2 also performs positively in this respect; however, the significance of effects is uncertain, reflecting the absence of growth at key settlement Monmouth, and other

settlements in the Upper Wye catchment area. This has the potential to exacerbate existing demographic issues and levels of out-commuting, specifically in the Upper Wye catchment area.

Strategic growth areas

Each of the potential strategic growth options were subject to a comparative appraisal under each ISA theme in 2021. Summary findings are reproduced 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.

2.51 quantum and type of development.

Abergavenny

Table 6.3 Summary appraisal findings for Abergavenny strategic growth areas

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

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

2.53 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 ISA theme as this Option best supports deprived communities to the west of the town.
- 2.54 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.
- 2.55 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.
- 2.56 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 Brecon Beacons National Park, 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.
- 2.57 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.
- 2.58 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 areas at higher risk of flooding, 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

2.59 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.

2.60 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.

2.61 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.

- 2.62 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, impacts upon which have the potential for long term negative effects.
- 2.63 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.
- 2.64 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.
- 2.65 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

- 2.66 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.
- 2.67 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.
- 2.68 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.

- 2.69 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.
- 2.70 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).
- 2.71 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').
- 2.72 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.
- 2.73 For all Options, effects against Climate Change are uncertain at this stage.

Severnside

Table 6.6: Summary appraisal findings for Severnside growth areas

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

2.74 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.

- 2.75 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.
- 2.76 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.
- 2.77 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.
- 2.78 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.
- 2.79 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.

- 2.80 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.

3. Developing the preferred strategy

- 3.1 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

- 3.2 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 (September 2022) that is published alongside the Preferred Strategy. These outline reasons are repeated below.

Preferred growth and spatial option

- 3.3 The options appraisal concludes that Growth Option 2 and Spatial Option 2 combined are the most appropriate options for the new Preferred Strategy. The other growth and spatial strategy options have been discounted for various reasons, as set out in the options appraisal in Appendix 1.
- 3.4 While Growth Option 2 would reduce the level of growth proposed compared to the 2021 Preferred Strategy it is considered the best option to respond to the challenge outlined in paragraph 1.2.1, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing at pace and scale, responding to the climate and nature emergency by delivering zero carbon ready new homes for our communities, and ensuring our communities are socially and economically sustainable. Similarly, Spatial Option 2 responds to the phosphate water quality issues in the upper River Wye catchment by amending the spatial strategy to avoid new growth in the upper River Wye catchment, including the primary settlement of Monmouth. While this means that the strategy would be unable to deliver the Council's objectives in those settlements in the phosphate affected catchment, this option would address our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergency, and as such is considered the most appropriate spatial strategy option.
- 3.5 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions⁹. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing our demography by ensuring that young people can choose to live in the County while responding to the climate and nature emergency, and the

⁹ Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.

issues identified in relation to phosphates. The ISA analysis identifies that Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this option. This growth option performs well 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 range of new housing, employment opportunities and community infrastructure to meet the needs of the County providing a more balanced demographic and sustainable communities. While Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities it performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape. In addition, Welsh Government raised significant concerns in relation to this Growth Option, and, without an identified strategic solution to the water quality environmental constraint in the upper River Wye Catchment the Council cannot progress with new site allocations for future growth in this area within the Plan period. Growth Option 1 has therefore been discounted. Further to this, Growth Option 3 performs negatively to RLDP objectives relating to Economic Growth/Employment, Demography, Housing, Place-making, Communities, Rural Communities, Infrastructure and Accessibility. It is also noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. Option 3 would not deliver on our core objectives of delivery of affordable housing and rebalancing our demography and has subsequently been rejected. For further details on Growth Options 1 and 3 refer to the Growth and Spatial Strategy Options Appraisal as set out in Appendix 1.

- 3.6 It is recognised that the Preferred Spatial Option is unable to deliver the Council's objectives, including the delivery of new affordable homes, in those settlements in the upper River Wye catchment. In the absence of identified strategic solutions to the treatment of phosphates in the upper River Wye catchment area during the Plan period, this shortcoming is unavoidable and it is not possible to allocate sites for new growth (homes and employment) in the affected river catchment. In contrast, strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area which enables sustainable growth within the most sustainable settlements within the River Usk catchment area over the Plan period. The southern part of the County remains unaffected by this issue. Accordingly, Spatial Option 2 performs less positively overall than Option 1 against ISA themes, particularly, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The significance of effects is uncertain, reflecting the absence of growth at key settlement Monmouth, and other settlements in the upper River Wye catchment area. This has the potential to exacerbate existing demographic issues and levels of out-commuting, specifically in the upper River Wye catchment area.
- 3.7 The Preferred Growth and Spatial Option would best achieve sustainable balanced deliverable outcomes by:
- Delivering a level of growth (homes and jobs) that addresses our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes,

rebalancing our demography and responding to the climate and nature emergencies, whilst having regard to WG officer concerns regarding alignment with Future Wales: the National Plan 2040.

- Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites which would help to tackle Monmouthshire's housing need, homelessness and social inequality. This approach would also enable the Council to consider alternative mechanisms for delivering affordable homes.
- Providing a wider choice of smaller homes to enable younger people to live and work in Monmouthshire which would make our ageing communities more socially and economically sustainable.
- Requiring new homes to be zero carbon ready, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements¹⁰. This would limit the impacts of climate change and ensure good placemaking principles of attractive, accessible places to live and work that have access to sustainable transport links and reduce the need for journeys by the car.
- Promoting sustainable economic growth by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council's Economic Growth and Ambition Statement, Investment Prospectus and climate emergency declaration, maximising opportunities from Cardiff Capital Region City Deal, targeting growth in key economic sectors and providing appropriate employment land in the right locations.

3.8 Overall, it is considered that the Preferred Strategy, based on the above preferred growth and spatial options, strikes a compromise between achieving our local evidence-based objectives that underpinned the Preferred Strategy consulted upon in July 2021 and the Welsh Government's response which objected to the level of growth proposed. It also takes account of the phosphate constraint in the upper River Wye catchment. In response, the new Strategy proposes a lower level of growth and an amended spatial strategy that responds to these challenges.

Preferred Strategic Site Allocations

Detailed reasons for progressing strategic site allocations are presented in Appendix 5 of the Preferred Strategy. Outline reasons are repeated below, with further detail available at Appendix 5.

The Preferred Strategic Site Allocations have been selected from a total of 13 Strategic Growth Options located across Abergavenny, Chepstow, Monmouth and Severnside that were previously consulted on in the 2021 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received on the 2021 Preferred Strategy.

¹⁰ Excluding those settlements in the upper River Wye catchment area due to the lack of an identified strategic solution for the treatment of phosphates at the Monmouth WwTW within the Plan period.

As part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'. Although it was made clear at that time that this was not part of the formal consultation, the results provide a helpful indication of public opinion. A total of 3,179 preferences were cast in the process. Table 7.1 below provides further detail. The three Preferred Strategic Site Allocations identified in the new Preferred Strategy are highlighted.

Table 7.1 Preferences cast on Strategic Site Options at time of 2021 Preferred Strategy consultation

Strategic growth area		Up votes	Down votes
Abergavenny A	Land north of Abergavenny	54	184
Abergavenny B	Land to the east of the A465	191	23
Abergavenny C	Land between the B4246	107	47
Chepstow D	Land north of the Bayfield Estate	51	132
Chepstow E	Land between the Bayfield Estate and A48	43	143
Chepstow F*	Land between the A48 and M48	60	143
Monmouth G	Land west of Monmouth	270	175
Monmouth H	Land central Monmouth	255	189
Monmouth I	Land north east Monmouth	318	248
Severnside J	Land north east of Caldicot	74	72
Severnside K	Land north west of Caldicot	48	85
Severnside L	Land west of Caldicot/ east of Rogiet	57	100
Severnside M	Land east of Caerwent	59	51

3.9 The reasons for selection of sites are set out below:

Abergavenny East

3.10 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use development, containing a mix of residential uses alongside employment/commercial uses, facilities and services.

3.11 The proximity of the area to Abergavenny Railway Station (currently an approximately 10 minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an

approximate 16 minute walking distance from the town centre (0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

- 3.12 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update . The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.
- 3.13 Taking into account the delay with the RLDP, the time needed to open up the site (including the provision of significant infrastructure namely a cycle footway bridge over the A465 and railway) and a realistic completion rate, the size of the candidate site means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

Bayfield, Chepstow

- 3.14 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the existing built up area west of the A466, south of the Usk road (B4235). The site adjoins the AONB and is in close proximity to Chepstow Racecourse. PPW11 gives National Parks and AONBs equal status in terms of landscape and scenic beauty and requires that both be afforded the highest status of protection from inappropriate developments. Development in this location would need to be carefully designed to ensure that any effects on the setting of the AONB are acceptable. The land is categorised as being of medium landscape sensitivity to residential development .
- 3.15 The site is approximately a mile or an approximate 15 minute walking distance from the town centre, half a mile (approximately 9 minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 21 minutes' walk) from Chepstow railway station. As outlined above, careful consideration will be required regarding the cumulative impact of development on the A466, A48 and Highbeech roundabout.
- 3.16 The land is predictive grade 3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. The alternative Strategic Development Site option is on higher quality BMV land. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Another consideration will include its location in the limestone minerals safeguarding area.

Caldicot East

- 3.17 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the north east, towards the settlement of Crick and adjacent to the adopted LDP Crick Road, Portskewett site. The site is north of the Caldicot Castle Country Park, a Conservation Area and an area currently designated as an Area of Amenity Importance under the Adopted LDP.
- 3.18 A small part of the candidate site adjacent to the former railway line is located in floodplain: built development would not be permitted within this part of the site. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being on Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.
- 3.19 In terms of agricultural land, the site contains a small area of grade 1 agricultural land, most of which is within a floodplain so would not be built on. The remaining area is classified predominantly as grade 2 agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.
- 3.20 In terms of distance from Caldicot town centre, it is approximately 1.2 miles (from a central point of the growth area) and approximately 22 minutes walking distance. It is approximately a 33 minute walk from Caldicot railway station. The former railway line has recently been purchased by MCC and is being turned into an active travel route, offering a significant benefit in terms of modal shift and leisure provision. Landscape sensitivity to residential development is high/medium. Part of this site is within the limestone minerals safeguarding area.
- 3.21 Taking into account the delay with the RLDP, the time needed to open up the sites and a realistic completion rate, the size of the candidate sites means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

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

4. Appraisal findings at this stage

- 4.1 Part 2 of the ISA Report and this NTS answers the question - What are appraisal findings at this stage? - by presenting an appraisal of the Preferred Strategy Document. Summary findings of the appraisal are presented below.
- 4.2 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. The delivery of Strategic Development Sites perform particularly well in this respect, contributing significantly to growth whilst enabling the delivery of supporting infrastructure (employment, retail, leisure, education, transport, community, etc.) in sustainable locations, as a result of economies of scale.
- 4.3 Where possible, the Preferred Strategy takes advantage of opportunities being presented through the Cardiff Capital Region City Deal and South East Wales Metro. It is also considered that preferred strategic site allocations could support a level of self-containment, reducing the need to travel. However it is noted that supporting infrastructure in this respect is currently undetermined.
- 4.4 By having regard to the phosphate constraint in the Upper River Wye catchment, the Spatial Strategy does not directed any new development to primary settlement Monmouth, nor other settlements in the catchment area. This is likely to exacerbate accessibility and demography issues in the north east of the County, and could contribute to rural isolation in the certain areas. It is however recognised that a solution to the phosphates issue may be found within the Plan period. If this were to happen, development could progress in Monmouth before the end of the Plan period, thereby enabling the provision of much needed homes and employment for those communities.
- 4.5 More broadly, the Preferred Strategy 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. However as set out above, positive effects in this respect do not extend to those settlements within the Upper Wye Catchment.
- 4.6 While conclusions have been drawn in relation to the environmental ISA themes, it is recognised that there remains a level of uncertainty in light of

unknown development sites. In relation to climate change, it is considered that flood risk is not an issue for the preferred strategic site allocations, and that higher level planning policy will ensure development is directed away from the highest risk areas. Preferred strategic sites are further identified as having the potential to seek strategic scale opportunities for delivering innovative renewable energy generation.

- 4.7 The appraisal highlights the potential for preferred strategic site Caldicot East to lead to negative effects in relation to the Historic Environment ISA theme, given its location within the Caldicot Conservation Area, which includes Caldicot Castle Grade I listed building and a Scheduled Monument. While it is noted that's suitable site design/ layout can mitigate effects to some degree, specific details in this respect are absent at this stage. More broadly, it is recognised that 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. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 4.8 In terms of the landscape, notably Abergavenny and Chepstow are constrained in terms of proximity to nationally designated landscapes; the Wye Valley AONB and Brecon Beacons National Park. It is considered that strategic development on greenfield sites Abergavenny East and Bayfield, Chepstow have the potential to impact upon the setting and character of these important landscapes.
- 4.9 However, Preferred Strategy policies seek to ensure that development retains and enhances historic assets and key landscape areas, and the overall historic and landscape character and rural setting, to reduce the extent and significance of the inevitable effects of the required growth. Notably, Strategic Policy S3 ensures that new development incorporates the principles of sustainable place-making and good design. Uncertain negative effects are therefore concluded in relation to the Historic Environment and Landscape ISA themes.
- 4.10 In relation to Natural Resources, all three preferred strategic site allocations are located on high quality agricultural land with Abergavenny East located on an area grade 2/3a agricultural land and Bayfield on land including grade 3a. Caldicot East includes a small area of grade 1, most of which is within floodplain so would not be built on. The remaining site is predominantly grade 2. In light of this, and given the widespread nature of high quality ALC more broadly throughout the County, is considered that substantial loss of the County's soil resource is inevitable. Furthermore, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. While there remains a level of uncertainty in light of unknown development sites, significant negative effects are concluded.
- 4.11 In terms of biodiversity, as set out in the HRA, due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. only three broad preferred strategic site allocations are allocated without definite boundaries and only some policy wording is available) and the lack of key evidence (e.g. no air quality assessment), effects are uncertain at this stage in relation to the biodiversity ISA theme. It is considered that a fully conclusive HRA AA will be carried out at the Deposit stage.

- 4.12 Overall, in relation to the level of uncertainty concluded against the ISA themes, it is recognised that candidate sites will be considered through the ISA process in due course and the findings will inform the development of the Deposit Plan.
- 4.13 Table 10.1 overleaf 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

Commentary	Residual significant effect predicted at this stage?
Economy and employment	
<p>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, including Strategic Development Sites, directed towards the higher tier settlements of Abergavenny, Caldicot (including Severnside), and Chepstow, where there is greater need and better access to sustainable transport modes and wider infrastructure. Notably, Caldicot East is a mixed-use site proposed to deliver 1,460 homes (923 in the plan period) alongside employment, retail, and leisure, which will encourage inward investment and support local economic growth.</p> <p>It is however recognised that due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth WWTW within the Plan period, no new site allocations are proposed within the upper River Wye catchment area north of Bigsweir Bridge, including the primary settlement of Monmouth. It is considered that limiting employment opportunities in the settlements in the Upper Wye catchment area will exacerbate out-commuting and may exacerbate any existing demographic issues in Monmouth and other settlements in the Upper Wye catchment, reducing the working age population in the north east of the County.</p> <p>If a solution to the phosphates issue were found within the Plan period, development could progress in Monmouth before the end of the Plan period, thereby enabling the provision of much needed homes and employment for those communities.</p> <p>The Preferred Strategy takes advantage of the proposed South East Wales Metro rollout to 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</p>	<p>Yes - Positive</p>

Commentary

Residual
significant effect
predicted at this
stage?

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.

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. Irrespective of the phosphate constraint, the distribution of new development broadly aligns with the Settlement Hierarchy. 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 delivery of Strategic Development Sites perform particularly well in this respect, contributing significantly to growth whilst enabling the delivery of supporting infrastructure (employment, retail, leisure, education, community use, etc.) as a result of economies of scale.

Yes - Positive

However by having regard to the phosphate constraint in the Upper River Wye catchment, development is not directed to Monmouth, nor other settlements in the catchment area, and therefore accessibility and demography issues are likely to be exacerbated in the north east of the County. It is however recognised that a solution to the phosphates issue may be found within the Plan period. If this were to happen, development could progress in Monmouth before the end of the Plan period, thereby enabling the provision of much needed homes and employment for those communities.

Whilst the majority of growth is delivered at Abergavenny, Chepstow and Caldicot (including Severnside), the Preferred Strategy also ensures that smaller rural and remote settlements receive some new growth and the associated benefits. This includes 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. It is therefore 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. To further deliver on key objectives, the strategy also

Commentary

**Residual
significant effect
predicted at this
stage?**

incorporates a commitment to 50% affordable housing on all new site allocations. This will help to address the demographic and affordability challenges facing the County, having a long-term positive effect.

Health and wellbeing

The Preferred Strategy proposes distributing growth according to the settlement hierarchy. The majority of development is therefore directed towards primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area, 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. Notably, growth at strategic site allocation Caldicot East includes provision of 'employment, retail and leisure', with further details to be provided within the Infrastructure Plan which is being developed to support the Deposit RLDP. Creating and sustaining communities and facilitating accessible and healthy environments is anticipated to lead to long term positive effects on overall health and wellbeing.

However, by having regard to the phosphate constraint in the Upper River Wye catchment, development is not directed to primary settlement Monmouth, nor other settlements in the catchment area, which could lead to the deterioration in health and wellbeing of residents, and could contribute to rural isolation in certain areas, notably within smaller rural settlements in the Upper Wye catchment area. It is however recognised that growth could be directed to Monmouth and other settlements in the Upper River Wye catchment later in the Plan Period if a solution to the phosphate issue is found.

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 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

Commentary	Residual significant effect predicted at this stage?
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Equalities, diversity and social inclusion

The Preferred Strategy’s proposed 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 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. Positive effects in this respect are reflected through the strategic site allocations, delivering significant new homes, supported by infrastructure and employment, to address local needs. Abergavenny East in particular will deliver a well contained community in itself, supporting neighbourhood satisfaction to the east of the town where deprivation levels are currently high.

Uncertain

Consideration is also given to the phosphate constraint in the Upper River Wye catchment. Development is not directed to Monmouth, nor other settlements in the catchment area at this stage, and therefore accessibility, inclusion, and deprivation issues are likely to be exacerbated in the north east of the County. It is however recognised that growth could be directed to Monmouth and other settlements in the Upper River Wye catchment if a solution to the phosphate issue is found.

The commitment to 50% affordable homes on all new site allocations will 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

Yes - Positive

Commentary

**Residual
significant effect
predicted at this
stage?**

in order to link with services and facilities. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards higher tier settlements (Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area) where there is better access to sustainable transport modes and wider infrastructure. Preferred strategic site allocation Caldicot East performs well in this respect, directing growth to the southern extent of Monmouthshire, 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. Additionally given the scale of growth proposed it is considered likely that supporting infrastructure will include transport improvements, likely improving the active/ sustainable travel network and supporting levels of self-containment.

The distribution of growth also enables the Preferred Strategy to take advantage of the proposed South East Wales Metro rollout to 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.

It is noted that an absence of growth in the north east of the County will likely exacerbate out-commuting and car reliance in this location, particularly in Monmouth which does not have a train station. This is likely to place increased pressure on the road network within and surrounding these settlements. It is however recognised that growth could be directed to Monmouth and other settlements in the Upper River Wye catchment if a solution to the phosphate issue is found.

Notwithstanding the above, it is considered that at a strategic scale the Preferred Strategy performs positively through taking advantage of opportunities arising from the Cardiff Capital Region City Deal and South East Wales Metro proposals. At a settlement specific scale it provides for opportunities to enhance and extend the Active Travel Network and integrate new development into it; with the potential for significant effects.

Natural resources

Commentary	Residual significant effect predicted at this stage?
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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 ULEV 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.

Yes - negative

The Preferred Strategy seeks to protect BMV agricultural land and minimise its loss as far as possible through the Preferred Strategy; undertaking a sequential approach to the allocation of candidate sites. As only three 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. However, given the widespread nature of high quality ALC throughout the County, and location of the three preferred strategic site allocations on Grade 1 and 2 BMV agricultural land, it is considered that substantial loss of the County’s soil resource is inevitable. Furthermore, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. While there remains a level of uncertainty in light of unknown development sites, significant negative effects are concluded.

Biodiversity

In terms of potential impacts on internationally designated sites, a HRA AA has been carried out for the preferred strategy, including the three preferred strategic site allocations. However, the HRA AA concludes that “due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. only three broad preferred strategic site allocations are allocated without definite boundaries 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 definitive Appropriate Assessment at this stage. For example, the Deposit Plan HRA will require an Air Quality Impact Assessment and the specific location of the growth allocated in the Plan. This will provide

Uncertain

Commentary

**Residual
significant effect
predicted at this
stage?**

conclusive evidence on how the changed traffic volume / flow might affect European sites or whether specific site allocations might lead to the loss of functionally linked land. However, given that some detailed policy wording is already available, this 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.”

The ISA supports the conclusions/ recommendations of the HRA AA, and it is considered that these will be adopted through the Deposit Plan.

Monmouthshire’s main settlements are further constrained by other sensitive receptors, as identified through the HRA (2022), 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. AECOM’s work (2022) indicates that a package of mitigation measures, alongside further evidence and additional policy provisions will be required to support development coming forward under the Deposit Plan.

Overall, as set out in the HRA, due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. only three broad preferred strategic site allocations are allocated without definite boundaries and only some policy wording is available) and the lack of key evidence (e.g. no air quality assessment), effects are uncertain at this stage in relation to the biodiversity ISA theme.

Historic environment

Policy S7 (Preferred Strategic Site Allocations) identifies three large, mixed-use urban extensions proposed at the edge of Abergavenny, Chepstow and Caldicot (including Severnside area). Strategic growth proposed at Caldicot East is most constrained of the strategic site allocations, with the potential to adversely impact upon the Caldicot Conservation Area, including Caldicot Castle Grade I listed building and a Scheduled Monument. While it is noted that’s suitable site design/ layout can mitigate effects to some degree, specific details in this

Uncertain

Commentary	Residual significant effect predicted at this stage?
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respect are absent at this stage. As only the three preferred strategic development site allocations have been 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.

More broadly, it is recognised that 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, uncertain negative effects are identified at this stage. This reflects the absence of site-specific mitigation and wider policy framework at this stage. Furthermore, the nature and significance of effects will be dependent on the precise location and scale of all growth proposed, which will be provided through the Deposit RDLP.

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.

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 and Chepstow) are constrained in terms of proximity to nationally designated landscapes; the Wye Valley AONB and Brecon Beacons National Park. Particularly, it is considered that strategic development on greenfield sites Abergavenny East and Bayfield, Chepstow have the potential to impact upon the setting and character of these important landscapes. Notably, Abergavenny East is characterised as being of ‘high to medium landscape sensitivity’ in relation to residential development.

Uncertain

Commentary	Residual significant effect predicted at this stage?
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However, 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.

Overall, it is considered that there is the potential for the Preferred Strategy to lead to long term negative effects on the landscape. However, it is not possible to conclude effects 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, alongside wider policy provisions yet to be developed.

Climate change	
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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. Furthermore, where strategic site allocations have been identified, it is recognised that flood risk is not a significant issue, with all strategic sites broadly directed away from high flood risk areas.

The allocation of strategic development sites, notably Caldicot East and to a lesser extent Abergavenny East, could theoretically maximise the potential to seek strategic scale opportunities for delivering innovative renewable energy generation. 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 viability and site-specific cost considerations.

Uncertain

Part 3: What happens next?

5. Next steps and monitoring

- 5.1 Part 3 of the Initial SA Report and this Non-Technical Summary explains the next steps in the plan-making/ SA process.

Next Steps

- 5.2 The Initial SA Report and this Non-Technical Summary will accompany the Preferred Strategy for public consultation from 5th December 2022 to 30th January 2023. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and ISA process.
- 5.3 The representations received along with further evidence base work, including further ISA work, will inform the development of the Deposit RLDP which is scheduled to be published for consultation in Spring 2024. An updated ISA Report will accompany the Deposit RLDP for consultation.

Monitoring

- 5.4 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. No measures have been identified at this stage, as the Deposit RLDP is yet to be prepared.

