

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

Initial ISA Report

Monmouthshire County Council

November 2022

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# Introduction

# 1. Introduction

## Background

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

## ISA Explained

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

## Sustainability Appraisal (SA)

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

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<sup>1</sup> Directive 2001/42/EC

- 1.6 The LDP Manual Edition 3 (2020) states that SA, incorporating SEA, plays an important part in demonstrating that the LDP is sound by ensuring that it reflects the legislative requirements and achieves sustainable development.

## Equalities Impact Assessment (EqIA)

- 1.7 As a public-sector organisation, Monmouthshire Council has a duty under the Equality Act 2010<sup>2</sup> and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the RLDP avoid unlawful discrimination (direct and indirect), instead, advancing equality of opportunity and fostering good relations between those with protected characteristics<sup>3</sup> and all others.
- 1.8 In March 2021 the Socio-economic Duty commenced, which compliments the Equalities Act and PSED by further contributing towards Wales' long term well-being goals, in particular "A more equal Wales" and "A Wales of cohesive communities". Further strengthening social partnership arrangements and advancing fair work ambitions.<sup>4</sup>
- 1.9 An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

## Health Impact Assessment (HIA)

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

## Welsh Language Impact Assessment (WLIA)

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

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

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

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



objectives, policies and proposals individually and in combination, impact on the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

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

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

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

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

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

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

## This Initial ISA Report

1.16 This Initial ISA Report<sup>5</sup> is published alongside the Preferred Strategy. Any representations received will be taken into account and a revised ISA Report will be published subsequently alongside the Deposit Plan.

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

## 2. What is the Preferred Strategy seeking to achieve?

2.1 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of the Council's purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life. The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP will build upon the current LDP which covers the period 2011-2021.

### Issues, challenges, and opportunities

2.2 The key issues, challenges and opportunities/ drivers facing the County (economic, environmental, social, and cultural) are set out in the RLDP Issues, Vision and Objectives Paper (updated December 2022). The Issues have been grouped to align with the seven Well-being Goals as set out in the Well-being of Future Generations (Wales) Act 2015 to ensure that they are framed within this context. A summary of the key issues and challenges as set out by the Council are presented below:

- We have the highest average house prices in Wales. This means a large proportion of people cannot afford to buy a home so either leave the County, or have to live with their parents or in shared housing for longer. We have 2,200 households identified as being in need of affordable housing<sup>6</sup>. The RLDP will explore opportunities to increase the number of affordable homes and ensure a range and choice of homes are incorporated within new developments.
- Our population is getting older. By 2033 we will have more old people living in the County but fewer young people. An older population changes the kind of services our communities will need, but also reduces the number of people using and financially supporting businesses and services. We will have a smaller economically active population making Monmouthshire a less attractive place for businesses to locate. This impacts on our future economic prospects.
- The Council has declared a climate emergency and has committed to strive to limit the increase in global temperatures to 1.5°C and strengthened emphasis on nature recovery. The RLDP will provide the land use policy framework to address the climate and nature emergency together, seeking outcomes that recognise the role resilient ecosystems can play in tackling carbon emissions and mitigating the impact of climate change. The RLDP will establish policy to support and enable renewable energy generation and establish requirements for net zero carbon ready developments and other sustainable development principles such as active travel, green

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<sup>6</sup> MCC Affordable Housing Prospectus 2022

infrastructure, and local food production. These will sit alongside and integrate with policies for protection of sites designated for biodiversity, habitats and species and deliver on Net Biodiversity Benefit.

- We have an urgent need to tackle water quality and phosphate pollution in our rivers Natural Resources Wales (NRW) has adopted tighter targets for river water quality and have put in place a requirement to achieve phosphate neutrality or betterment in the River Usk and River Wye. In recognition of the water quality issues in the County, a Motion for Rivers and Ocean was declared by Council in March 2022 with an [action plan](#) agreed by Council in September 2022 to outline steps the Council will take to protect our rivers and ocean.
- There is a need to consider whether existing employment land is suitably located and fit for purpose for appropriate growth sectors, along with the potential increase in agile and home working and the impact this may have on employment land demand/requirements. We also need to consider future demand in line with Council aspirations and the opportunities that a shift in working behaviour could create with businesses given greater flexibility over where to locate.
- There are opportunities associated with growth from both the Cardiff Capital Region and Bristol region.
- Unemployment levels are low; however, Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled. Monmouthshire also has a net-outflow of commuters. To address these issues there is a need to provide support for inward investment and local employment growth/opportunities.
- Vacancy rates in some of the County's town and local centres have increased due to changing shopping habits including internet shopping and economic factors such as high business rates and the cost of living crisis.
- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. The recent pandemic has emphasised the value and importance of having locally accessible services and facilities.
- We want to protect the landscapes and heritage that make Monmouthshire a unique and attractive place to live. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and recreation.
- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres.

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

## **Future Wales: The National Plan 2040 (February 2021)**

- 2.4 Future Wales sets out the national development framework and direction for development in Wales to 2040, it contains a number of policies that are considered to be of particular relevance to Monmouthshire providing the national policy context to address key issues facing Monmouthshire.
- 2.5 Policy 3 – Supporting Urban Growth and Regeneration - Public Sector Leadership - sets out that Welsh Government will play an active role in the delivery of growth and urban regeneration, working with local authorities to unlock the potential of public land and support local authorities to take an increased development role. Of note Policies 4 – Supporting Rural Communities and Policy 5 – Supporting the Rural Economy, provide the policy framework to consider how age balanced communities can be achieved, where depopulation should be reversed and allowing for sustainable, appropriate and proportionate economic growth. Policy 7 – Delivering Affordable Homes, also addresses the key issue of affordable housing prices in the County and provides the framework to address this through affordable housing led developments. These policies are considered to provide significant opportunities to address a number of the key issues facing the County.

## **Building Better Places: The Planning System Delivering Resilient and Brighter Futures. Placemaking and the Covid-19 recovery (July 2020)**

- 2.6 The Covid-19 pandemic has resulted in many challenges, but it has also resulted in some significant changes in how we operate our daily lives and use the neighbourhood spaces around us. Welsh Government's Building Better Places Covid-19 recovery policy document recognises this, and the opportunity it has created to continue with some of the shifts in behaviour and the increased importance on placemaking that have been highlighted as a result of Covid-19. In this respect, the RLDP is recognised as a key mechanism in delivering the planning policy priorities identified in the Building Better Places document to assist in the Covid-19 recovery and maintaining and enabling the sustainable improvements that have arisen from the situation. Examples include greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Similarly, the importance of digital connectivity and necessity to incorporate sufficient infrastructure in developments from the outset has been highlighted, particularly in rural areas.

## **Climate and Nature Emergency and Motion for the Rivers and Ocean**

- 2.7 In May 2019, the Council declared a Climate Emergency and published an updated Climate and Decarbonisation Strategy and Action Plan in November 2021, with strengthened emphasis on nature recovery in recognition of the nature emergency. This sets out key actions the Council will take to reduce its own carbon emissions to net zero in line with Welsh Government's target of 2030, but also make a commitment to work with partners and organisations to develop and implement best practice in limiting global warming to less than 1.5°C. As recognised by PPW11 and Building Better Places, the RLDP and its

policy framework and allocations provide a significant opportunity to address the causes and effects of climate change. It is recognised that efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of land and resources and flood resilience.

- 2.8 In recognition of urgent need to address water quality in the County the Climate Emergency Action Plan November 2021 update, included the addition of an action on addressing water quality, establishing the requirement to prepare an action plan specifically on water quality. In March 2022 the Motion for the Rivers and Ocean was agreed by Council with the associated Action Plan agreed in September 2022. This sets out measures and to tackle river quality and the partnerships in place to provide a co-ordinated approach to the issue. Of particular relevance to the RLDP is the ongoing work with NRW and Welsh Water and continued involvement with the Wye Nutrient Management Board and the Usk Catchment Partnership to identify and implement options for delivering improvements in water quality.

## **Cardiff Capital Region City Deal**

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

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

## **Monmouthshire 2040: Our Economic Growth and Ambition Statement and Inward Investment Prospectus 2020: Growing your Business in Monmouthshire**

2.10 The Council's Economic Growth and Ambition Statement and Prospectus set out the aspirations to raise the profile of Monmouthshire as a dynamic place to do business, a credible place to invest and an incredible place to live, visit and stay. It recognises that Monmouthshire's economy needs to grow to help build sustainable and resilient communities and to achieve the draft Community and Corporate Plan<sup>7</sup> goal of being a thriving and ambitious place, full of hope and enterprise..

2.11 The Economic Growth and Ambition Statement and accompanying Prospectus and emerging Economic Development Strategy will work alongside the RLDP and will assist in:

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

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<sup>7</sup> The draft Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities. It was endorsed by [Cabinet on 19<sup>th</sup> October 2022](#) and a developed version will be reported to Council in January 2023.



## Vision

- 2.12 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

- 2.13 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.
- 2.14 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 <sup>8</sup> | Main PPW11 theme                   | PSB Well-being plan objective   |
|---|---|--|------------------------------------|------------------------------------|---|
| <b>A Prosperous Wales (Well-being Goal 1)</b> |   |  |                                    |                                    |   |
| <b>Objective 1</b>                            | Economic Growth/<br>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.          |
| <b>Objective 2</b>                            | 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.          |
| <b>A Resilient Wales (Well-being Goal 2)</b>  |   |  |                                    |                                    |   |
| <b>Objective 3</b>                            | Green Infras-<br>tructure,<br>Biodiversity<br>and<br>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. |
| <b>Objective 4</b>                            | 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. |

<sup>8</sup> See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.



| RLDP Objective Number                         | Headline               | RLDP Objective  | RLDP issues addressed <sup>8</sup> | Main PPW11 theme                   | PSB Well-being plan objective   |
|---|------------------------|---|------------------------------------|------------------------------------|---|
| <b>Objective 5</b>                            | 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. |
| <b>Objective 6</b>                            | Land                   | To promote the efficient use of land, including the need to: <ul style="list-style-type: none"> <li>• maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire.</li> <li>• 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.</li> <li>• support the adaptation and re-use of existing sustainably located buildings.</li> </ul> | 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. |
| <b>Objective 7</b>                            | 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. |
| <b>A Healthier Wales (Well-being Goal 3)</b>  |                        |   |                                    |                                    |   |
| <b>Objective 8</b>                            | 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.   |
| <b>A More Equal Wales (Well-being Goal 4)</b> |                        |   |                                    |                                    |   |
| <b>Objective 9</b>                            | 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 <sup>8</sup>                    | Main PPW11 theme                   | PSB Well-being plan objective  |
|--|-------------------|---|---|------------------------------------|--|
| <b>A Wales of Cohesive Communities (Well-being Goal 5)</b> |                   |   |   |                                    |  |
| <b>Objective 10</b>  | 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.  |
| <b>Objective 11</b>  | 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.  |
| <b>Objective 12</b>  | 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. |
| <b>Objective 13</b>  | 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. |
| <b>Objective 14</b>  | 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. |
| <b>Objective 15</b>  | 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 <sup>8</sup> | Main PPW11 theme               | PSB Well-being plan objective   |
|---|--------------------------------------|---|------------------------------------|--------------------------------|---|
|   |                                      |   |                                    |                                | thriving and well-connected county.   |
| <b>A Wales of Vibrant Culture &amp; Thriving Welsh Language (Well-being Goal 6)</b> |                                      |   |                                    |                                |   |
| <b>Objective 16</b>   | 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. |
| <b>A Globally Responsible Wales (Well-being Goal 7)</b>                             |                                      |   |                                    |                                |   |
| <b>Objective 17</b>   | 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

## 3. What is the scope of the ISA

### Introduction

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

### Consultation on the scope

- 3.2 The Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the SA scope], the responsible authority shall consult the consultation bodies*”. In Wales, the consultation bodies are the natural Resources Wales and Cadw.<sup>9</sup> A Scoping Report was sent to the statutory consultees for comment from 26th October to 30th November 2018. The responses received were taken into account and amendments made to the baseline information and draft ISA Objectives where necessary. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2018.
- 3.3 Further information on the scope of the ISA - i.e., a more detailed review of sustainability issues/ objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ – is available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.

### SA Objectives

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

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<sup>9</sup> In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

**Table 3.1 ISA framework**

| ISA theme  | ISA objective   |
|--|---|
| <b>Economy and Employment</b>                            | <p>Deliver sustainable economic growth by strengthening the local economy and capitalising on the opportunities associated with the Cardiff Capital Region City Deal, promote tourism and enhance the vitality and viability of town centres.</p> <p>Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.</p>  |
| <b>Population and Communities</b>                        | <p>Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.</p> <p>Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.</p>  |
| <b>Health and well-being</b>                             | To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.  |
| <b>Equalities, diversity and social inclusion</b>        | To reduce poverty and inequality; tackle social exclusion and promote community cohesion.   |
| <b>Transport and Movement</b>                            | To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.  |
| <b>Natural Resources (Air, Land, Minerals and Water)</b> | <p>To reduce all forms of air pollution in the interests of improving local air quality.</p> <p>To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.</p> <p>To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use and recycling.</p> <p>To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.</p> |
| <b>Biodiversity and Geodiversity</b>                     | To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.  |
| <b>Historic Environment</b>                              | 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.  |
| <b>Landscape</b>   | To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.  |
| <b>Climate Change</b>                                    | To promote and encourage energy generation from renewable sources and energy efficiency.  |
| <b>Flood Risk</b>  | Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.   |

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

## 4. Introduction (to Part 1)

- 4.1 The review of the Local Development Plan has been underway since 2018, with a wide range of evidence produced to inform the development of the RLDP. Table 4.1 sets out the key RLDP and SA Documents published along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.<sup>10</sup>

**Table 4.1 RLDP and ISA stages**

| RLDP Documents & Consultation   | ISA Documents & Consultation   |
|---|--|
|   | ISA Scoping Report<br>Sent to statutory consultees for consultation<br>from 26 <sup>th</sup> October to 30 <sup>th</sup> November 2018.  |
| Issues, Vision and Objectives Paper (January 2019 as amended June 2021)   |  |
| Growth and Spatial Options Consultation Paper<br>Public consultation from July to August 2019   |  |
| Preferred Strategy<br>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<br>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)<br>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<br>Public consultation from January to February 2021   | ISA of Strategic Options Report<br>Public consultation January – February 2021 on the revisited RLDP Growth and Spatial Options  |
| Preferred Strategy<br>Public consultation from July to August 2021  | Initial ISA Report and NTS<br>Public consultation from July to August 2021   |
|   | ISA of the revised growth and spatial options<br>October 2022  |

- 4.2 This part of the Initial ISA Report 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

<sup>10</sup> <https://www.monmouthshire.gov.uk/planning-policy/local-development-plan-revision/>

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

- 4.3 This part of the report presents information regarding the consideration of reasonable alternatives. This information is important given regulatory requirements.<sup>11</sup>

## Structure of this part of the report

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

- Chapter 5 - explains the context and work undertaken to develop reasonable alternatives at this stage;
- Chapter 6 - presents an appraisal of the reasonable alternatives; and
- Chapter 7 - explains reasons for selecting the preferred strategy.

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<sup>11</sup> 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.



## 5. Establishing the reasonable alternatives

### Introduction

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

### Level of growth

#### Initial ISA of growth options (March 2020)

- 5.2 Monmouthshire, Torfaen, and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the Replacement Local Development Plan (RLDP). A total of 20 different demographic-led, housing-led, and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 mid and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.
- 5.3 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.
- 5.4 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out.

#### Revised growth options (December 2020)

- 5.5 The Council 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.
- 5.6 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

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.

- 5.7 The 2020 publication of corrected Welsh Government 2018-based population and household projections comprise important new evidence that requires consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.
- 5.8 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.<sup>12</sup>
- 5.9 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.
- 5.10 The six growth options identified in the Growth and Spatial Options Paper (December 2020)<sup>13</sup> 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.<sup>14</sup>

## Revised growth options (October 2022)

- 5.11 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.
- 5.12 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.
- 5.13 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

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

<sup>13</sup> 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/>

<sup>14</sup> 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).

- 5.14 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.
- 5.15 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.
- 5.16 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 5.1** overleaf.

**Table 5.1 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 |
|---|------------------|-----------------------------|---------------------|---------------------------------|----------------------------|--------------------|---------------------|---------------------|----------------|----------------|
| <b>Existing Preferred Strategy growth</b><br><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          |
| <b>Demographic led strategy for the LPA area</b><br><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          |
| <b>WG prescribed growth</b><br><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)

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

### Revised spatial options (December 2020)

5.18 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.

5.19 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.<sup>15,16</sup>

### Revised spatial options (October 2022)

5.20 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.

5.21 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

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<sup>15</sup> 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/>

<sup>16</sup> 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.

- 5.22 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.
- 5.23 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.
- 5.24 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.
- 5.25 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.
- 5.26 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).
- 5.27 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 5.2** overleaf.

**Table 5.2 2022 spatial strategy options**

| Spatial Option   | Description   |
|--|---|
| <b>Distribute growth proportionately across the County's most sustainable settlements</b>  | Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, 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.   |
| <b>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</b> | 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. |

## Strategic growth areas

- 5.28 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.
- 5.29 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.
- 5.30 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.
- 5.31 This assessment is reproduced in Appendix B.

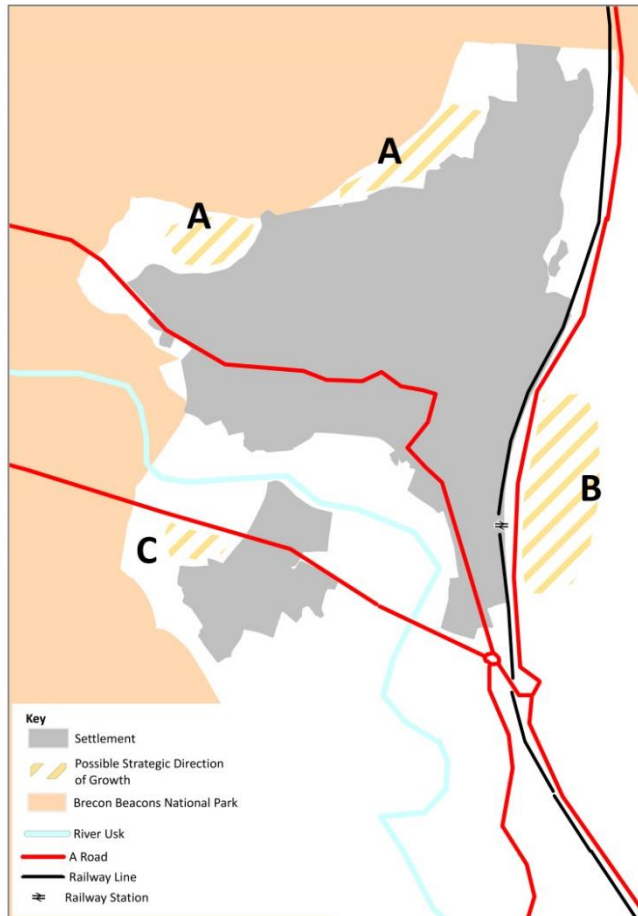


## Abergavenny and Llanfoist

5.32 Three possible strategic growth areas/ options for Abergavenny and Llanfoist were identified and are set out below and illustrated in **Figure 5.3**:

- 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 5.3 Abergavenny Strategic Growth Areas**

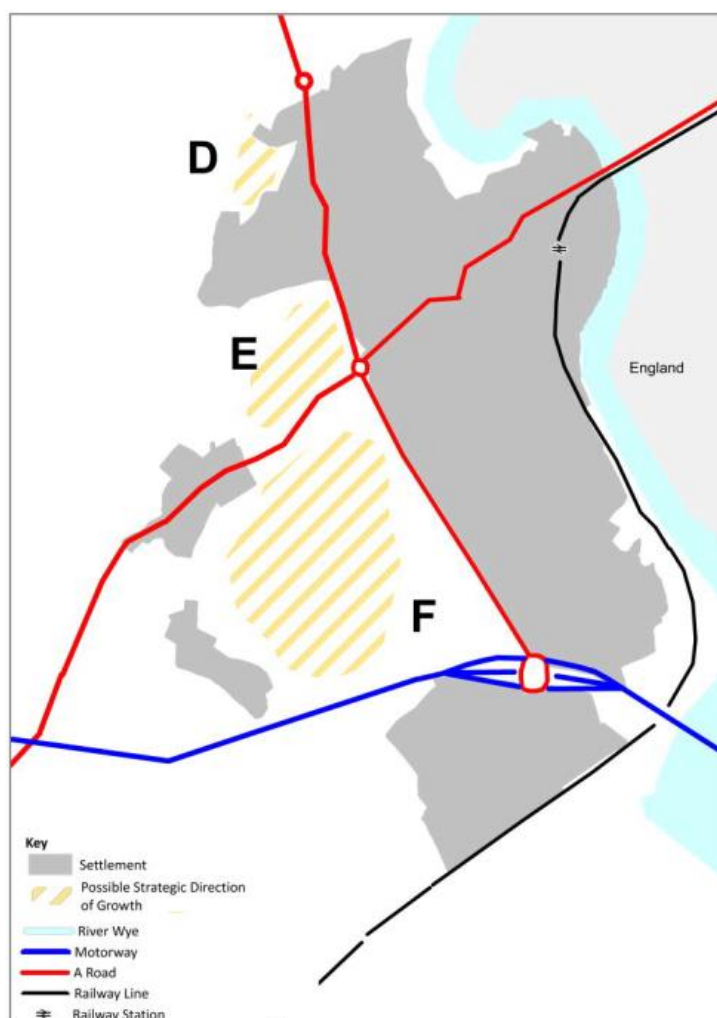


## Chepstow

5.33 Three possible strategic growth areas/ options for Chepstow have been identified at this stage and are set out below and illustrated in **Figure 5.4**:

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

**Figure 5.4 Chepstow Strategic Growth Areas**

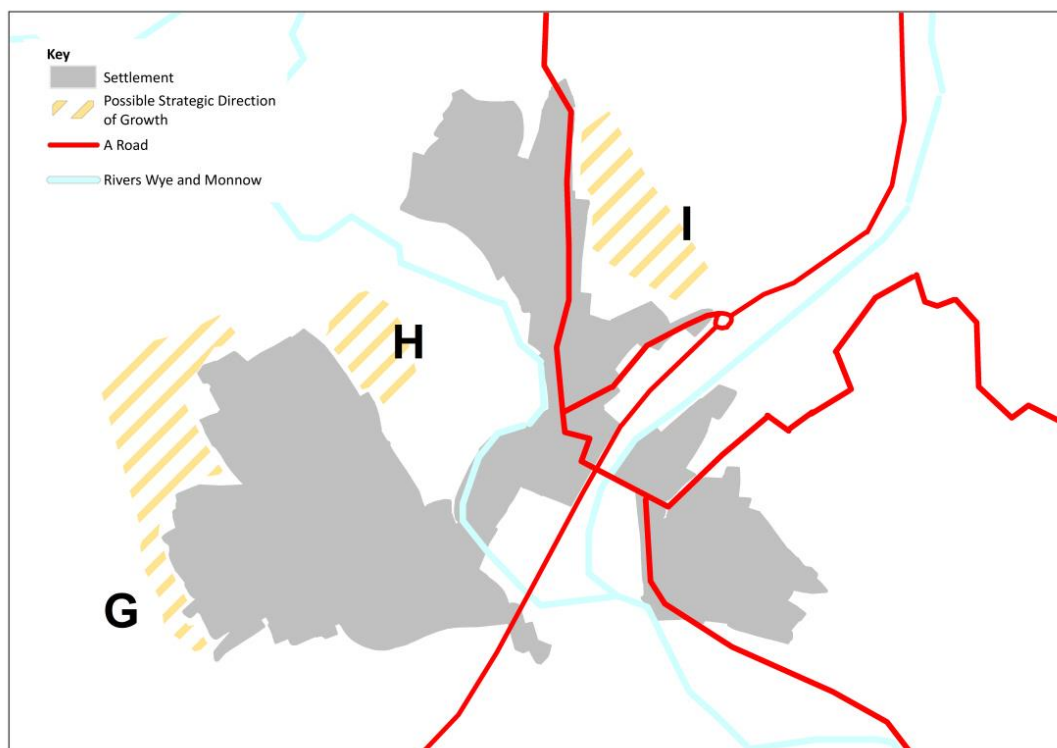


## Monmouth

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

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

**Figure 5.5 Monmouth strategic growth options**

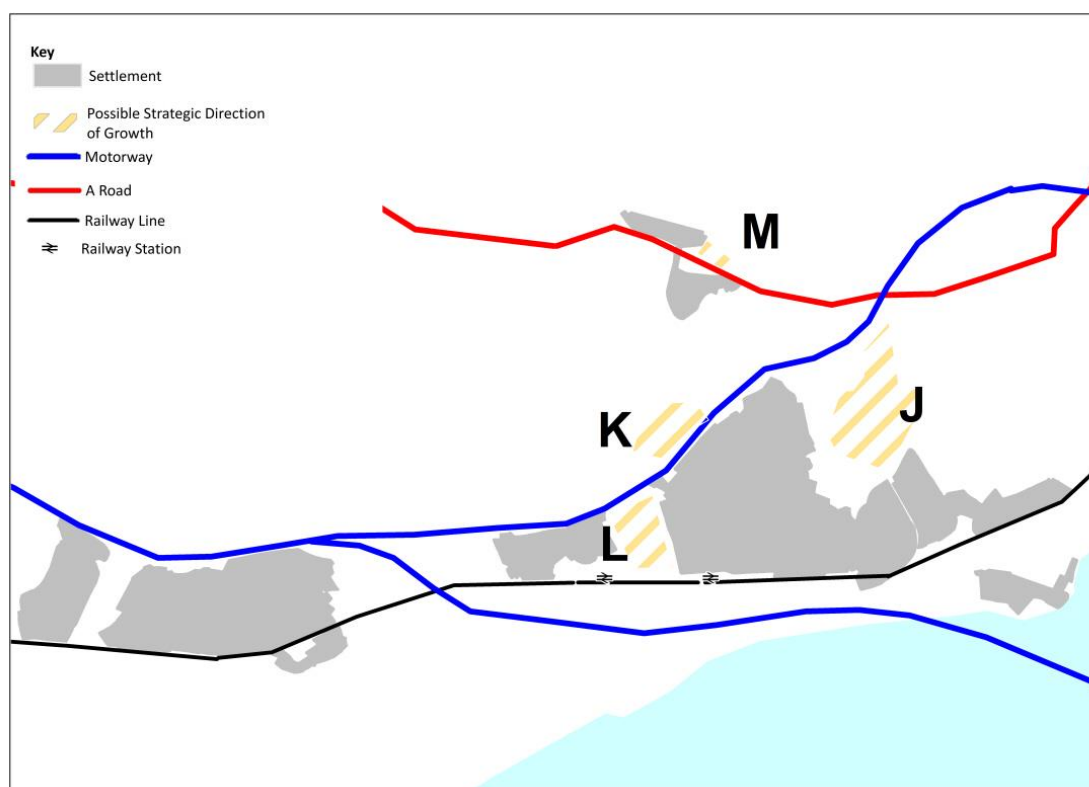


## Severnside

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

- 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 5.6 Severnside strategic growth areas**



## 6. Appraising the reasonable alternatives

### Introduction

6.1 This chapter presents the summary findings of the appraisal of reasonable alternatives set out in Chapter 4 above. Sets of options have been considered for the following:

- Level of growth
- Location of growth; and
- Strategic growth areas

### Method

6.2 The strategic options identified in **Chapter 5** were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in **Appendix II**.

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

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

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

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

## Summary appraisal findings for strategic options

### Level of growth

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

## Summary findings and conclusions for level of growth options

| ISA theme  | Rank/<br>significant effect | Categorisation and rank |                |           |
|--|-----------------------------|-------------------------|----------------|-----------|
|  |                             | Option 1                | Option 2       | Option 3  |
| Economy and<br>Employment                            | Rank                        | 1                       | 2              | 3         |
|  | Significant effect?         | Yes - positive          | Yes - positive | No        |
| Population and<br>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<br>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,<br>land, minerals and water) | Rank                        | 3                       | 2              | 1         |
|  | Significant effect?         | Uncertain               | Uncertain      | Uncertain |
| Biodiversity and<br>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<br>(including flood risk)             | Rank                        | 1                       | 2              | 3         |
|  | Significant effect?         | No                      | No             | No        |

- 6.8 For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors 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.
- 6.9 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment (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.
- 6.10 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.
- 6.11 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.



6.12 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 identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in Appendix B and summary findings provided 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  |

- 6.13 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.
- 6.14 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.
- 6.15 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.
- 6.16 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.
- 6.17 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

6.18 Each of the potential strategic growth options identified in **Chapter 5** were subject to a comparative appraisal under each ISA theme in 2021. The detailed findings are reproduced in Appendix B and summary findings provided below. It should be noted that in order to allow for a fair and comparative appraisal it was assumed that each strategic growth option could deliver the same quantum and type of development.

### Abergavenny

**Table 6.3 Summary appraisal findings for 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      |

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

6.20 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.

- 6.21 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.
- 6.22 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Usk SAC. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level, and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.
- 6.23 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.
- 6.24 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Usk SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 6.25 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             |

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



- 6.29 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.
- 6.30 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.
- 6.31 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.
- 6.32 For all Options, effects against Climate Change are uncertain at this stage.

## Monmouth

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

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

- 6.33 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.
- 6.34 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.
- 6.35 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

Option G is best performing in this respect as it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

- 6.36 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Notably, significant negative effects are predicted for all options due to nutrient neutrality implications on the River Wye SAC. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.
- 6.37 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).
- 6.38 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance').
- 6.39 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 6.40 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/<br>Significant<br>effects | Categorisation and rank |                   |                   |                   |
|---|---------------------------------|-------------------------|-------------------|-------------------|-------------------|
|   |                                 | Option J                | Option K          | Option L          | Option M          |
| <b>Economy and<br/>Employment</b>                         | Rank                            | 2                       | 2                 | 1                 | 3                 |
|   | Significant<br>effect?          | No                      | No                | No                | No                |
| <b>Population and<br/>Communities</b>                     | Rank                            | 1                       | 2                 | 1                 | 3                 |
|   | Significant<br>effect?          | Yes - Positive          | Yes - Positive    | Yes - Positive    | Yes -<br>Positive |
| <b>Health and<br/>wellbeing</b>                           | Rank                            | 2                       | 2                 | 1                 | 3                 |
|   | Significant<br>effect?          | No                      | No                | No                | No                |
| <b>Equalities,<br/>diversity and<br/>social inclusion</b> | Rank                            | 2                       | 3                 | 1                 | 4                 |
|   | Significant<br>effect?          | No                      | No                | No                | No                |
| <b>Transport and<br/>movement</b>                         | Rank                            | 2                       | 2                 | 1                 | 3                 |
|   | Significant<br>effect?          | No                      | No                | No                | No                |
| <b>Natural<br/>Resources</b>                              | Rank                            | 2                       | 2                 | 1                 | 2                 |
|   | Significant<br>effect?          | Yes -<br>Negative       | Yes -<br>Negative | Yes -<br>Negative | Yes -<br>Negative |
| <b>Biodiversity and<br/>geodiversity</b>                  | Rank                            | 3                       | 2                 | 3                 | 1                 |
|   | Significant<br>effect?          | Uncertain               | Uncertain         | Uncertain         | Uncertain         |
| <b>Historic<br/>Environment</b>                           | Rank                            | 3                       | 2                 | 1                 | 2                 |
|   | Significant<br>effect?          | Uncertain               | Uncertain         | No                | Uncertain         |
| <b>Landscape</b>  | Rank                            | 3                       | 3                 | 2                 | 1                 |
|   | Significant<br>effect?          | Yes -<br>Negative       | Yes -<br>Negative | Uncertain         | Uncertain         |
| <b>Climate Change</b>                                     | Rank                            | 1                       | 1                 | 3                 | 2                 |
|   | Significant<br>effect?          | Uncertain               | Uncertain         | Uncertain         | Uncertain         |

6.41 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network. Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with

the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres, services and facilities, and relatively limited potential to capitalise upon the strategic road network.

- 6.42 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.
- 6.43 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.
- 6.44 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.
- 6.45 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having 'medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated 'Green Wedge'. Option M is best performing in this respect, although there remains the potential for residual minor negative effects.
- 6.46 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive

effects to be delivered, i.e., through biodiversity net-gain, and the enhancement of designated assets.

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

## 7. Developing the preferred strategy

### Introduction

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

### The Council's outline reasons for choosing the preferred strategy

- 7.2 It should be noted that the Council's reasons for progressing or rejecting strategic options are presented in the Growth and Spatial Options Background Paper (September 2022) that is published alongside the Preferred Strategy. These outline reasons are repeated below.

### Preferred growth and spatial option

- 7.3 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.
- 7.4 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.
- 7.5 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions<sup>17</sup>. 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

<sup>17</sup> 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.

in the County while responding to the climate and nature emergency, and the 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.

7.6 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.

7.7 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 settlements<sup>18</sup>. 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.

7.8 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.

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<sup>18</sup> 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         |

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

### **Abergavenny East**

7.10 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.

7.11 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.

- 7.12 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.
- 7.13 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**

- 7.14 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 .
- 7.15 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.
- 7.16 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**

- 7.17 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.
- 7.18 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.
- 7.19 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.
- 7.20 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.
- 7.21 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?**

## 8. Introduction (to Part 2)

- 8.1 The aim of this chapter is to present an appraisal of the RLDP, as currently presented in the Preferred Strategy.
- 8.2 In order to implement the RLDP's Strategy, three strategic sites have been identified for the Primary Settlements of Abergavenny, Chepstow and Caldicot (see Chapter 5 above). Following consultation on the Preferred Strategy the Council will undertake a detailed assessment of the sites to ensure delivery of the Plan's Strategy. To further inform this assessment, ISA has been carried out for the three preferred strategic sites. This is to assess, in detail, the extent to which the preferred strategic proposals will help to achieve the wider environmental, economic, social, and cultural objectives of the RLDP.
- 8.3 The detailed appraisal of strategic sites can be found at Appendix C, with key messages reflected in the appraisal of the Preferred Strategy below.

### Methodology

- 8.4 The appraisal of the Preferred Strategy identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see Table 3.1) as a methodological framework. In total, there are ten ISA themes as follows:
- Economy and employment.
  - Population and communities.
  - Health and wellbeing.
  - Equalities, diversity, and social inclusion.
  - Transport and movement.
  - Natural resources (air, land, minerals and water).
  - Biodiversity and geodiversity.
  - Historic environment.
  - Landscape; and
  - Climate change.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.

8.6 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.<sup>19</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

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<sup>19</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 9. Appraisal of the preferred strategy

### Introduction

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

### Overview of the Preferred Strategy

- 9.2 Strategic Policy S1 (Strategic Sustainable and Resilient Growth) and Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) set the spatial strategy for housing and employment growth in Monmouthshire during the plan period.
- 9.3 In order to implement the RLDP's Strategy, preferred strategic site allocations are identified within Policy S7 for the Primary Settlements of Abergavenny, Chepstow and Caldicot. Each of the preferred strategic site allocations has been subject to ISA, as detailed in Appendix C, and the findings of this work has informed this appraisal below.
- 9.4 Policy S7 relates only to preferred strategic site allocations, additional sites are required to fulfil the housing requirement set out in the Strategy and will be identified in the Deposit Plan. The final selection of sites for the Deposit Plan will be dependent on further detailed assessment work.
- 9.5 Policy S1 states that the RLDP will make provision for 5,940 homes (to meet a housing requirement of 5,400 homes, including a 10% buffer) and 6,240 jobs over the Plan period 2018-2033. As set out in Policy S2, the focus of this development will be to the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, as well as some growth in the most sustainable 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 Waste Water Treatment Works (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.
- 9.6 Policy S2 sets out the indicative proportion of residential growth to be accommodated by each of the settlement tiers (a full breakdown can be found in the Housing Background Paper). The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal<sup>20</sup>, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Table 10.1 overleaf sets out a summary of the overarching indicative spatial distribution of housing provision for the RLDP.

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<sup>20</sup> The Sustainable Settlement Appraisal can be viewed on the Council's website via the following link:



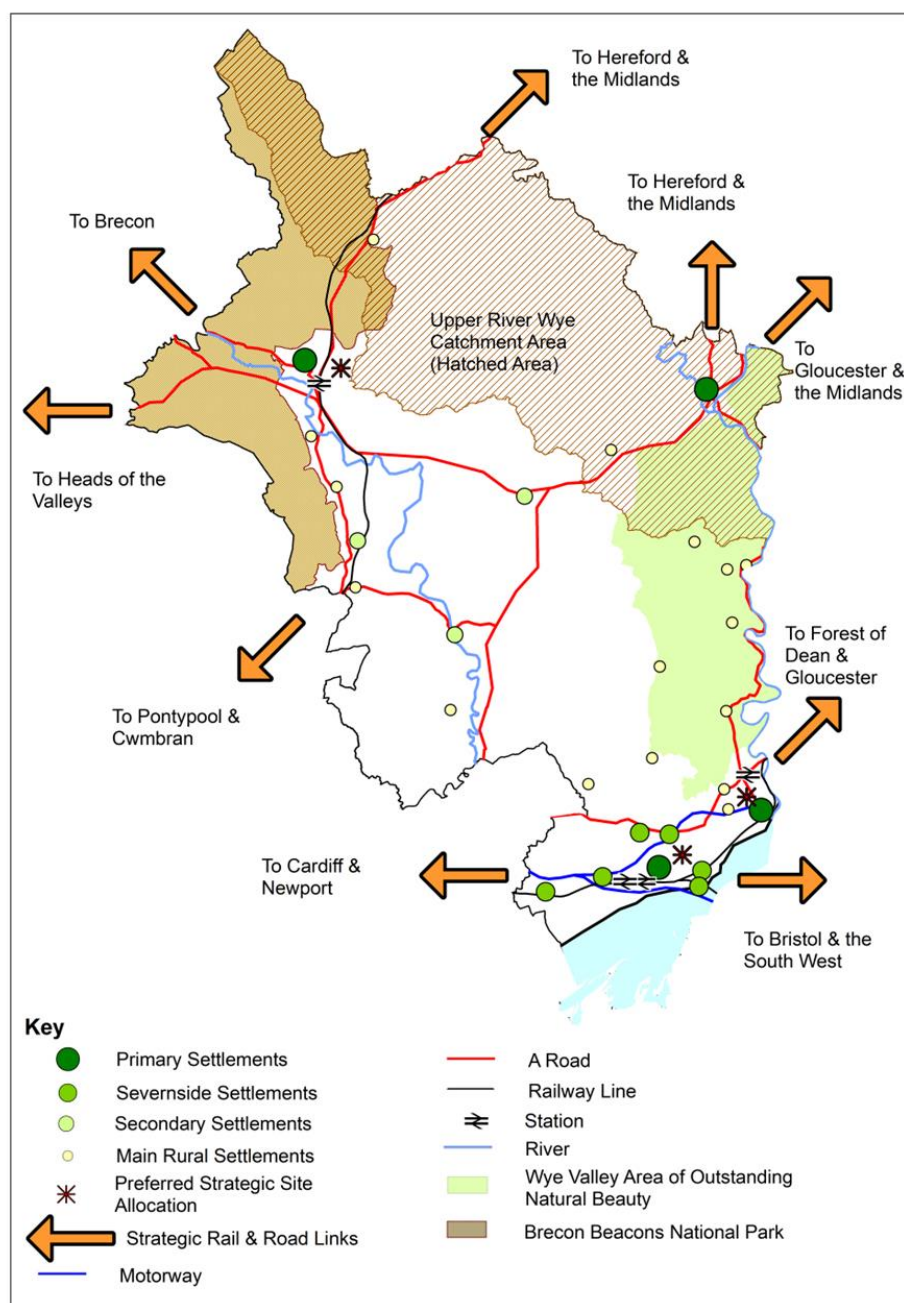
**Table 9.1 Summary of indicative spatial distribution of housing provision**

| Settlement                    | Total Commitments     |  | Sustainable and Resilient Communities Strategy |  | Total Housing Provision 2018-2033* |
|-------------------------------|-----------------------|--|--|--|------------------------------------|
|                               | Completions 2018-2021 | Existing Commitments; LDP Rollover Allocations | Total Allowances (Small Sites; Windfalls)      | RLDP New Housing Allocations (Dwellings) |                                    |
| Abergavenny (incl. Llanfoist) | 426                   | 132  | 245  | 600                                      | 1,403                              |
| Chepstow                      | 192                   | 267  | 165  | 145                                      | 769                                |
| Monmouth (incl. Wyesham)      | 264                   | 11   | 0  | 0  | 275                                |
| Caldicot (incl. Severnside)   | 466                   | 725  | 220  | 1,200                                    | 2611                               |
| Secondary Settlements         | 100                   | 45   | 80   | 155                                      | 380                                |
| Rural Settlements             | 131                   | 83   | 190  | 100                                      | 504                                |
| <b>Total</b>                  | <b>1,579</b>          | <b>1,263</b>                                   | <b>900</b>                                     | <b>2,200</b>                             | <b>5,942</b>                       |

- 9.7 The proportion of employment growth to be accommodated in the settlement tiers will be set out at the next stage in plan-making (Deposit RLDP); however, Policy S2 notes that employment growth will be consistent with the spatial strategy and commensurate to the level of housing growth. It can therefore be assumed that the majority of new employment land will be focussed at Primary Settlements.

9.8 The preferred strategy key diagram is provided below in Figure 9.1.

**Figure 9.1 Preferred Strategy key diagram**



## Economy and employment

### Appraisal of the preferred strategy

- 9.9 Policy S1 states that the RLDP will make provision for 5,940 homes (to meet a housing requirement of 5,400 homes) and 6,240 jobs over the Plan period 2018-2033. The proposed distribution of these homes is set out in Policy S2 and discussed earlier in this Chapter. The proposed distribution of employment growth will be set out at the next stage in plan-making (Deposit RLDP); however, Policy S2 notes that employment growth will be consistent with the spatial strategy, it can therefore be assumed that most new employment land will be focussed in the Primary Settlements of Abergavenny, Chepstow and Caldicot.
- 9.10 The spatial strategy performs positively in relation to the ISA objective to maximise the economic contribution of the area to the Cardiff City, Bristol, and wider South West Region, particularly in respect of directing housing growth to locations from which key regional employment hubs can be accessed. Abergavenny and Chepstow each have existing rail connections to both Newport and Cardiff, with services to Cardiff taking around 40-45 minutes from Abergavenny and around 40 minutes from Chepstow. Within the Severnside area, Caldicot has been classified as a higher tier settlement, with functional transport links to the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Caldicot Train Station connects the town to the employment areas of Newport, Cardiff, and Bristol.
- 9.11 Directing growth to these locations responds positively to the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro; a multi-modal transport network with services fulfilled by a combination of heavy rail, light rail and bus rapid transit. Higher growth in this part of the County will capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County located between the 'Great Western Cities'. Furthermore, directing growth close to the M4/ M48 will provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County.
- 9.12 It is considered likely that sustainable travel upgrades will be seen across the Primary Settlements; including an increase in the capacity of travel modes, increased frequency of services to Newport and Cardiff, and reduced journey times. This will enable workers to access key employment centres and jobs markets more quickly and more frequently, boosting the local and regional economy.
- 9.13 Distributing housing and employment growth between Abergavenny, Chepstow, and Caldicot (including Severnside) will help ensure growth is dispersed across the plan area and not simply concentrated towards the M4 corridor in the south. For example, despite being accessible to Cardiff, Abergavenny is sufficiently far north that it serves as the regional centre for a number of smaller settlements at the north of the plan area. By delivering substantial growth at Abergavenny,

including the strategic site Abergavenny East (Policy S7), the spatial strategy will help sustain the rural economy of the smaller settlements which Abergavenny services. Of note, the strategic Site Abergavenny East will deliver a mixed use development including residential, employment, retail, leisure, education and community use, which will also increase self-containment in the area.

- 9.14 By also distributing a substantial proportion of growth to the Severnside settlements the spatial strategy is likely to deliver further positive effects in relation to the economy and employment. The Severnside settlements (Caldicot, Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) are strategically located for access to the M4/ M48 corridors and to rail services between Cardiff and Bristol.
- 9.15 The preferred strategic site allocation Caldicot East will deliver 925 homes to the Severnside Area within the plan period, and will be supported by employment land. While the level of employment to be delivered is not yet identified, it is considered that strategic mixed-use development at Caldicot will make a considerable economic contribution to the Cardiff City Region. Locating housing and employment growth in close proximity to regional economic opportunities, particularly at Cardiff and Newport, has the potential to lead to significant long term positive effects.
- 9.16 Severnside is already well served by public transport via Caldicot and Severn Tunnel Junction stations and, as with other Tier 1 settlements, public transport connectivity is likely to be enhanced later in the plan period as the rollout of the SE Wales Metro progresses. Given the scale of growth proposed at Caldicot, it is considered that improvements to the sustainable/ active travel network would likely be delivered alongside housing and employment. Details regarding supporting infrastructure for the strategic site allocations is however absent at this stage. It is considered that further information will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.
- 9.17 Additionally, the Severnside settlement cluster already represents a key employment hub in its own right and delivering housing growth will help ensure the continued vitality of key employment sites such as Castle Gate Business Park at Caldicot and the AB InBev brewery at Magor. However, strategic housing growth at the south of the County is likely to also prove an attractive location for workers who commute to employment hubs outside the Cardiff City Region, particularly those who commute to Bristol which is a short drive or train journey away.
- 9.18 In terms of strategic site allocation Bayfield, Chepstow, it is recognised that the site is proposed for residential use alone, and therefore is unlikely to encourage inward investment and support local economic growth directly. However, by delivering growth and therefore an increase in the local workforce, development of the site will contribute towards the local/ wider economy, with potential for long-term positive effects. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 9.19 While options for strategic development within Primary Settlement Monmouth were explored, in light of the phosphates water quality issue discussed above, the spatial strategy does not direct growth to any settlements within the Upper Wye Catchment Area. It is considered that limiting employment opportunities in

these locations will exacerbate out-commuting, particularly to Gloucester and the Midlands, and may exacerbate any existing demographic issues. This is a particular concern for Monmouth and could reduce the working age population in the north east of the County. It is however noted that MCC are committed to finding phosphate solutions for the upper River Wye catchment as the Plan progresses. The RLDP will keep existing LDP allocations in Monmouth within the settlement boundary as 'aspirational sites' which could be developed to support economic growth in these communities in the longer term.

- 9.20 It is noted that Policy S7 relates only to preferred strategic site allocations, additional sites are required to fulfil the housing requirement set out in the Strategy and will be identified in the Deposit Plan.
- 9.21 Policy S12 (Employment Sites Provision) sets out the quantum of employment land to be delivered throughout the Plan period, in accordance with the Spatial Strategy and the recommendations of the Employment Land Review (ELR) (2022). In line with Policy S12, provision will be made for a minimum of 38 ha of land on a suitable range and choice of sites for industrial and business development (classes B1, B2 and B8). This minimum requirement reflects a forecast scenario based on past take-up rates and includes a five-year buffer to allow for choice and uncertainty in forecasting.
- 9.22 Policy S12 also seeks to protect existing employment land from conversion to "*alternative forms of development*". When considering the existing employment land supply, it is recognised that large existing employment allocation at Quay Point, Magor, accounts for a significant mass of land of the available supply of employment land at one site (13.76ha). The Preferred Strategy highlights the need for further supply to meet the shortfall of supply and enable further flexibility in the market in terms of types of land and locations. Further analysis in relation to the suitability and deliverability of existing Adopted LDP employment allocations will inform the Deposit RLDP.
- 9.23 The RLDP establishes support for a range of sites to meet employment needs to 2033, including local business hubs with printing or meeting room facilities for agile workers to utilise on demand, and small and medium sized enterprises (SMEs) needs which are a key sector in the County. It is considered that protecting existing employment sites whilst also delivering new employment land to meet needs will help maintain the vibrancy of Monmouthshire's economy as well as the Cardiff Capital Region's economy as a whole.
- 9.24 Consideration is also given through the Preferred Strategy to the shift in working routine seen throughout the Covid-19 pandemic. It aims to build on the shift in working practices and the benefits that occurred during Covid-19, as recognised in Welsh Government's Building Better Places document (2020). The document acknowledged that even when all restrictions were lifted, the impact of working from home was likely to have longer term impacts on where people work. The reliance on staying connected has become of particular importance in this respect, and it is considered that reliable and good quality communication systems will be essential in the County's economic and social recovery. Strategic Policy S5 (Infrastructure Provision) therefore states that "*Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided in phase with proposed development.*" Infrastructure in this respect includes "*broadband infrastructure*" to enable effective homeworking.

- 9.25 The other strategic policies likely to have a direct effect in relation to economy and employment are Strategic Policy S13 (Rural Enterprise) and Strategic Policy S14 (Visitor Economy). Future Wales (2021) has expressed a commitment to supporting vibrant rural areas and improving the rural economy.<sup>21</sup> The National Plan Policy 4 – Supporting Rural Communities, and Policy 5 – Supporting the Rural Economy, establish the national policy approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth. Policy S13 therefore seeks to sustain and enhance the economy of the County's rural settlements to ensure their continued viability, which is likely to have a long term positive effect on this theme.
- 9.26 The role of the rural economy in the Covid-19 recovery has also been acknowledged in Welsh Government's Building Better Places policy document whereby tourism and visitor sectors within rural areas of Wales are noted as key areas to facilitate the Covid-19 economic recovery. This is reflected through Policy S14 which recognises the significance of tourism to Monmouthshire's economy, with the supporting text of the policy stating that "*in rural areas tourism related development is an essential element in providing for a healthy diverse local economy*". By establishing support in principle for development which provides or enhances sustainable tourism Policy S14 will help support and grow the tourism sector which has the additional benefit of distributing employment opportunities throughout small settlements and rural areas of the County. Collectively, this suite of policies is considered to perform positively in relation to the ISA objectives of contributing to the local economy, strengthening and diversifying the economy, and ensuring a distribution of employment opportunities throughout the plan area.
- 9.27 PPW11 equally values the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration, and improvement in both urban and rural areas. As cross cutting topics a number of additional policies have potential for effects in relation to the economy and employment. Policy S10 (Town, Local and Neighbourhood Centres) establishes a three-tier retail hierarchy, with the broad retail offer of the four 'County towns' of Abergavenny, Caldicot, Chepstow and Monmouth recognised as being of significance not just to the towns themselves but also their wider rural hinterlands. The local centres of Magor, Raglan and Usk are located at the second tier and are recognised as serving a more local convenience function, whilst the third tier applies to local centres within larger settlements.
- 9.28 With the exception of Monmouth, focussing growth at the highest tier settlements the Preferred Strategy will help to support the vitality of existing centres. Conversely, restricting employment and housing growth in Monmouth will likely further the trend of increasing vacancy rates, which could adversely impact upon the local economy in the north east of the County Borough. It is noted that the hierarchy will be given further consideration as part of the Retail Study which will inform the Deposit Plan.
- 9.29 Welsh Government's commitment to better places, placemaking, quality outcomes, and good design is evidenced throughout the Building Better Places

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<sup>21</sup> Welsh Government (2020) Future Wales: the national plan 2040 [online] available at: <https://gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040>



(2020) paper, which identifies town centres as a policy area that should be the focus of consideration and action, in order to act as a catalyst for a recovery. The Preferred Strategy policy intention is therefore to protect town and local centre vitality and sustain the County's main settlements as "*vibrant and attractive centres*" to ensure that they "*remain attractive places to live and visit*". This is considered to perform positively in relation to the ISA objective to enhance the viability and vitality of town centres.

- 9.30 In terms of supporting the rural economy and tourist economy, Policy S17 (Green Infrastructure, Landscape and Nature Conservation) could have potential for indirect positive effects by protecting natural and built heritage attractions and thereby encouraging tourism development and tourist spend. For example, S17 seeks the protection of landscape and townscape character to protect and enhance "*landscape setting and quality of place*". Additionally, S17(ii) highlights the importance of resilient ecosystems.
- 9.31 Whilst highlighted as a key issue for the RLDP, the policies are largely silent on skills and training, though Policy S5 does recognise the importance of securing education facilities through the development process where required. Skills and training are important considerations in terms of aligning the RLDP with current and emerging economic opportunities at both a local and regional scale, i.e., the City Deal and the Skills for the Future Project. As discussed above, the RLDP sets out support for inward investment and local employment growth/opportunities; however, the Preferred Strategy could be further strengthened by establishing a policy position on delivering high quality skills and training.
- 9.32 At this stage, the quantum of new employment land and number of jobs to be delivered during the plan period is known, along with the location of preferred strategic site allocations. On this basis, **significant positive effects** are broadly concluded with a level of **uncertainty**. This is given that the focus of employment and housing growth at sustainable locations will likely encourage inward investment and support local economic growth. Positive effects also reflect the strong links to surrounding economic centres, accessible by sustainable transport as well as the strategic road network.
- 9.33 It is noted that there remains uncertainty in relation to the supporting infrastructure (including level of employment) to be delivered alongside strategic site allocations. Additionally, uncertainty relates to the distribution of growth outside of the three strategic sites. This detail is anticipated to be provided at the Deposit Stage.

## Summary appraisal of the Preferred Strategy

- 9.34 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 site allocations, 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. Detailed appraisal of the preferred strategic site allocations can be found in Appendix C.

- 9.35 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. Whilst the extent of employment land to be delivered alongside housing is uncertain at this stage, positive effects are nonetheless anticipated in the long term.
- 9.36 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. While this would likely lead to negative effects in the north east of the County Borough, it is 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.
- 9.37 The Preferred Strategy looks to capitalise on Monmouthshire's strategic location within the Cardiff City Region, links to the SW/ Bristol Region, and its access to the M4, M48 and mainline rail corridors to take advantage of local and regional economic opportunities. Alongside supporting the development of new employment in job growth sectors (new technologies and advanced manufacturing, IT and cyber security, tourism, and low carbon sustainable technologies) it will be vitally important to support and enhance education and skills related infrastructure in these areas to ensure that people have the right skills for these roles.
- 9.38 Overall, while it is recognised that the Preferred Strategy is unable to fully deliver the Council's objectives, the strategy nonetheless maximises delivery of core issues and objectives within the environmental and national policy constraints. **Significant long term positive effects** in relation to the economy and employment theme are therefore predicted.

## Appraisal of cumulative effects

- 9.39 Monmouthshire's location within the ten-authority Cardiff City Region gives it a broad regional context, and its location at the eastern edge of the region means it is also within the influence of economic hubs in England, particularly the Bristol City Region and local economic hubs in Gloucestershire and Herefordshire. In this context there are potential cumulative effects on the regional economy from development in the plan area and vice versa.
- 9.40 The Cardiff Capital Region City Deal identifies regional economic challenges and opportunities for the ten authorities which comprise the Cardiff Capital Region. Addressing economic challenges and maximising opportunities are right at the heart of the rationale behind the City Deal and there is likely to be significant potential for positive cumulative effects in relation to economy and employment in this context.



- 9.41 Development proposals in Newport are likely to be of particular significance in terms of cumulative effects from growth in Monmouthshire. Identified as a National Growth Area (Future Wales, 2021), Newport is a significant employment hub and population centre adjacent to Monmouthshire's southern boundary. The Newport LDP was adopted in January 2015 and proposes the delivery of 11,623 dwellings and 172ha of new employment land by 2026. An Eastern Expansion Area is proposed, a strategic mixed-use development, which will deliver 5,400 new homes and 39.5 ha of employment. This additional employment land could provide additional regional employment opportunities for workers from Monmouthshire and could potentially further bolster the business case for the eastward expansion of the South East Wales Metro. There could be particular cross boundary significance in relation to housing growth at the Severnside settlements, including strategic site allocation Caldicot East, as this could directly support the vitality of employment hubs along the M4 corridor. This will help maximise regional economic opportunities and is considered likely to have significant long term positive effects in relation to Monmouthshire and the Cardiff Capital Region more broadly.
- 9.42 The Newport LDP also safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road as the Duffryn Link Road between Maesglas and Coedkernew and the North South Link - Llanwern. Proposed development could increase traffic along the M4, A4042 and A449. However, in time the SE Wales Metro will be likely to relieve some of this additional traffic burden, particularly in relation to radial commuting between Monmouth/ Abergavenny/ Chepstow and employment hubs at Newport and Cardiff.
- 9.43 The visitor economy is significant in Monmouthshire and the Brecon Beacons National Park is a key component of this in terms of visitor accommodation and associated services. The Brecon Beacons National Park Authority is its own LPA and therefore is able to propose development within Monmouthshire but outside the Monmouthshire LDP plan area. However, the adopted Brecon Beacons National Park Local Plan (2013) proposes no significant growth during the plan period or in close proximity to the Monmouthshire administrative boundary. A revision of the LDP is currently being carried out and a Preferred Strategy Document was published for consultation in July 2019.
- 9.44 However, following new evidence regarding the environmental impacts of phosphate in watercourses, and subsequent tighter targets adopted by NRW for the water quality of watercourses, the BBNP authority has halted preparation of its RLDP.<sup>22</sup> The authority are investigating with NRW the permitting arrangements for Talgarth Wastewater Treatment Works and will recommence once obligations under the Habitats Regulations are met. As such, the scale and location of any future growth for the area is currently unknown.
- 9.45 While the exact level and location of growth is unknown at this stage, it is considered that focus will remain in the key settlements of Brecon, Crickhowell, Hay-on-Wye and Talgarth. Development therefore is not likely to result in any significant interactions with development being proposed through the

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<sup>22</sup> Brecon Beacons National Park Authority (2022) Planning: Phosphates [online] available at: <https://www.beacons-npa.gov.uk/planning/water-quality-phosphate-in-riverine-special-areas-of-conservation-and-implications-for-planning-and-development/>

Monmouthshire RLDP. Therefore, no significant effects are anticipated in relation to economy and employment.

- 9.46 There is also potential for cumulative effects in relation to development proposed west of the plan area in Torfaen and Blaenau Gwent, particularly given Abergavenny's strategic location on the A456 Heads of the Valleys Road, which links the Brecon Beacons and Monmouthshire with key settlements and employment sites in the north of the Cardiff Capital Region. In this context the replacement Blaenau Gwent LDP proposes two expansions of the Rassau Industrial Estate in the Ebbw Vale Enterprise Zone and an entirely new employment allocation at Rhyd-y-Blew, also in the Ebbw Vale Enterprise Zone. It is considered that cumulative positive effects are likely in relation to economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.
- 9.1 The two English LPAs of Herefordshire Council and Forest of Dean District Council are adjacent to the plan area's eastern boundary, with much of the boundary of both comprising the Wye Valley Area of Outstanding Natural Beauty (AONB). There are key settlements in both authorities which have strong functional links with Monmouthshire as both Ross-on-Wye in Herefordshire and Coleford in Gloucestershire are located a short distance from Monmouth along the A40 and A4136 respectively. Additionally Tusthill, Sedbury and Lydney have strong links to Chepstow in the south of the County. A commuter flow of residents exists from the south of the FoD along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. Additional development between Lydney and Chepstow therefore has the potential to exacerbate existing traffic issues in Chepstow. It is however recognised that the FoD Local Plan will likely offer measures which could mitigate the increase in congestion around Chepstow.
- 9.2 It is 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 reduce any potential increase in cross-boundary traffic on key roads, i.e., into and out of Monmouth. Similarly, any positive effects by virtue of supporting the wider regional economy will also be reduced at this location. Nonetheless, increased pressure on Chepstow's road network could be seen, with additional traffic likely at peak times. However, as set out above, it is considered that the SE Wales Metro may offset effects to some extent.

## Appraisal of the Preferred Strategy

- 9.3 A key consideration under the population and communities ISA theme is the provision of the right number of homes in the right places, including delivering a sufficient mix of housing types and tenures to meet different identified needs within the community.
- 9.4 In accordance with Strategic Policy S1 (Preferred Growth Strategy) the RLDP will deliver approximately 5,400 - 5,940 homes over the Plan period 2018-2033. The level of housing need is based on a demographic-led scenario with added

policy assumptions<sup>23</sup>, providing a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040 and the phosphate constraint in the Upper River Wye catchment.

- 9.5 This level of growth is in general conformity with Future Wales' overall strategy. Although Monmouthshire is not within the national growth area identified in Future Wales 2040: the National Plan, supporting evidence shows that the proposed level of growth is essential to deliver the County Borough's local evidence-based issues and objectives and ensure the RLDP is sound. It is supported by Future Wales policies 4, 5 and 7 in particular which support rural communities, the rural economy and the delivery of affordable homes.
- 9.6 Policy S1 identifies a total housing target of 5,940 dwellings over the plan period based on a 10% flexibility allowance which will be subject to further consideration and refinement at Deposit Plan stage. On this basis, Policy S1 is considered to have a significant long term positive effect as it proposes the delivery of enough new homes to meet identified needs, including affordable housing need, and includes some flexibility should any sites not come forward.
- 9.7 In terms of the location of new housing and employment, the Preferred Strategy identifies three strategic growth areas in the main towns of Abergavenny, Chepstow, and Caldicot (including Severnside), which have been considered through the ISA process. These sites have provided sufficient evidence of viability and deliverability that will be built on as the plan progresses. Two of the sites namely, Abergavenny East and Caldicot East, are anticipated to provide housing both within and beyond the RLDP plan period, delivering long term positive effects in relation to this ISA topic. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 9.8 Of note is Caldicot East, the largest of the strategic site allocations, which seeks to deliver 1460 homes (925 during the plan period) within a relatively deprived part of the community. In line with Policy S7, the strategic site will include a range of supporting infrastructure (employment, retail, and leisure) which will likely lead to positive effects in terms of supporting self-sustaining communities. Positive effects in this respect are also anticipated through the delivery of strategic site Abergavenny East, which is also proposed for mixed use, including education and community use. However, it is noted that this site is smaller in scale (635 homes, 500 to be delivered within the plan period).
- 9.9 More broadly, it is considered that the Spatial Strategy represents a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need, i.e., the larger settlements which offer the broadest range of services, facilities, and transport options. Under this distribution, Abergavenny is allocated 24% of growth over the plan period, Chepstow 13%, Monmouth 5%, and Caldicot (including Severnside area) 44%. This translates to around 1,403 dwellings at Abergavenny, 769 at Chepstow, 275<sup>24</sup> at Monmouth, and 2,611

<sup>23</sup> 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.

<sup>24</sup> Completions 2018-2021 and existing commitments

across the Severnside area. The three secondary settlements are apportioned 6% (380 dwellings). The remaining dwellings would be distributed between the main and minor rural settlements. The strengths of this approach are that smaller settlements all receive some allocated housing growth, helping to meet local housing need where it arises and ensuring the benefits of growth, such as the provision of new community infrastructure, are not simply directed to the highest tier settlements. This will likely ensure the delivery much needed affordable homes in the right places and address rural inequality and rural isolation in the lower tier areas.

- 9.10 The distribution set out has regard to the latest position on the phosphates water quality issue, and associated requirements to demonstrate neutrality or betterment when proposing development. In the absence of a solution for the upper River Wye catchment, development is restricted in the primary settlement of Monmouth and the wider Upper Wye catchment area. This will likely lead to increased accessibility and demography issues in the north east of the County Borough, particularly in the key centre of Monmouth. It is however noted that if a strategic phosphate solution is found for the upper River Wye catchment during the RLDP plan period, there is the potential for development to progress in Monmouth, thereby enabling the provision of much needed homes for those communities.
- 9.11 Affordable housing is one of the key challenges facing the County Borough's communities. The Preferred Strategy specifically seeks to address housing affordability, committing to the delivery of 1,580 - 1,850 affordable homes, of which approx. 830 – 1,100 will be delivered through new housing allocations (Policy S6). The Spatial Strategy seeks to maximise affordable housing delivery on new housing allocations and commits (through Policy S6) to deliver 50% affordable homes on all new housing sites. It is noted that the RLDP will contain detailed policies setting out thresholds at which development will be required to provide affordable housing. Additionally, an Affordable Housing Viability Study will be undertaken to inform the appropriate thresholds set out in the Deposit RLDP.
- 9.12 While thresholds for delivery remain uncertain, it is considered that the commitment to 50% affordable housing will lead to long-term positive effects, helping tackle Monmouthshire's housing need, homelessness, and social inequality. The supporting text of Policy S6 highlights the significance of affordable housing for the RLDP, forming an integral part of the overarching Strategy. Provision will contribute positively towards addressing issues associated with the County's high house prices (relative to the Welsh average and relative to earnings), such as difficulties attracting and retaining younger age groups and anticipated increased demand for housing in Monmouthshire related to the removal of the Severn Bridge Tolls.
- 9.13 On balance it is considered that the preferred strategy performs broadly positively in relation to the population and communities ISA theme given it will deliver above the level of objectively assessed housing need. In line with the Settlement Hierarchy, growth will be focused to the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area, together with a sustainable amount of growth to the most sustainable lower tier settlements. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal, which groups settlements into

tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.

- 9.14 Other strategic policies likely to have a direct effect in relation to population and communities are Policy S3 (Sustainable Placemaking & High Quality Design), Policy S5 (Infrastructure Provision), and Policy S11 (Community and Recreation Facilities). Policy S3 establishes a range of criteria by which development will be expected to contribute to *“high quality, attractive and sustainable places that support the health and well-being of the community”*. This includes safe and inclusive design, co-locating different land uses to maximise public transport accessibility, incorporating Green Infrastructure and leveraging the natural, historic, and built character of a site to contribute to quality placemaking.
- 9.15 Policy S5 (Infrastructure Provision) emphasises the importance of infrastructure in ensuring the sustainability of new development. The policy presents a comprehensive approach to seeking suitable new infrastructure through the development process, effectively establishing a hierarchy of mechanisms for infrastructure delivery. It sets an expectation that new or improved infrastructure *“must be provided as part of the proposed development”*. Furthermore, *“where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought.”* An expansive list of potential planning obligations is also presented which will be sought where infrastructure improvements are *“necessary to physically deliver a development and ensure that it is acceptable in planning terms”*.
- 9.16 Necessary infrastructure in this respect includes *“broadband infrastructure”* to enable effective homeworking and communication, reflecting the shift in working routine seen throughout the Covid-19 pandemic. The Spatial Strategy aims to build on the change in working practices and lifestyles seen, capitalising upon the benefits that occurred during Covid-19, and as recognised in Welsh Government’s Building Better Places response. The Building Better Places document acknowledges that even when all restrictions are lifted, the impacts on people working from home are likely to have longer term impacts on planning for sustainable communities. This is reflected through Policy S5 supporting policy text, which highlights that having reliable and good quality communication systems in place is essential in helping the economic and social recovery.
- 9.17 Policy S11 (Community and Recreation Facilities) performs positively in terms of planning for sustainable communities, focussing on ensuring provision or enhancement of accessible community and recreation facilities, defined in the supporting text as *“facilities used by the local communities for leisure, social, health, education and cultural purposes”*. The Policy also establishes a presumption against the unjustified loss of such facilities.
- 9.18 It is important that RLDP plans for the needs of the gypsy and travellers as well as the settled community. Policy S8 (Gypsy and Travellers) seeks to address this through a high-level commitment that *“land will be made available to accommodate future unmet gypsy and traveller accommodation needs”* where such need is supported by recent evidence. Specific criteria based policies to assess the development of Gypsy and Traveller Accommodation will be considered within the Deposit RLDP.

- 9.19 Overall, the suite of policies is considered to perform positively in relation to the population and communities ISA theme. This is on the basis that policies provide detailed and robust support for the provision of sustainable development by seeking that adequate community infrastructure accompanies new development either directly or via off site contributions. The policies collectively protect existing facilities and look to deliver high quality placemaking through the development process, including a requirement that new development seeks to ensure that services and facilities are accessible by public transport where possible.

## Summary appraisal of the preferred strategy

- 9.20 The Preferred Strategy proposes the delivery make provision for 5,940 dwellings to meet a housing requirement of 5,400 dwellings (with a 10% buffer), and 6,240 new jobs. The Preferred Strategy is based on a demographic-led scenario with added policy assumptions to address the County's key demographic and affordability issues, whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040 and the phosphate constraint in the Upper River Wye catchment.
- 9.21 Irrespective of the phosphate constraint, the distribution of new development broadly aligns with the Settlement Hierarchy. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal, which groups settlements into tiers based on their role and function. Focussing growth at locations which are best served by existing services, facilities, and community infrastructure; will help ensure that most 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.
- 9.22 The delivery of the preferred strategic site allocations 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.
- 9.23 As set out in Policy S2, whilst the majority of growth is delivered at the most sustainable settlements (with the exception of Monmouth), the smaller rural and remote settlements still 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.
- 9.24 While the exact distribution of development will be identified in the Deposit RDLP, it is considered that the direction of growth proposed will likely lead to long term positive effects, meeting local needs and supporting sustainable communities.
- 9.25 Overall, the Preferred Strategy is predicted to have a **significant long term positive effect** in relation to the population and communities ISA theme. It supports the Council's core objective of building sustainable and resilient communities across Monmouthshire, and tackling the County's pressing affordable housing challenge, in the long term. The Preferred Strategy will have associated benefits for the Council's social objectives, including building the housing needs of different groups within the community, providing a wide range



of choice of housing types and tenures in both urban and rural areas. 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.

- 9.26 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.

## **Appraisal of cumulative effects**

- 9.27 Development proposed within the Preferred Strategy has the potential for cumulative effects with growth proposed by other authorities within and beyond the Cardiff Capital Region, particularly in relation to the supply of a sufficient quantity of the new homes in sustainable locations.
- 9.28 The adopted and emerging development plans of all the surrounding local authorities propose meeting or exceeding their housing need. This means that the Preferred Strategy's proposed housing delivery is contributing to a regional position of housing and infrastructure needs being met where it arises, which is a significant positive cumulative effect in relation to the population and communities ISA theme.
- 9.29 In this context there are likely to be positive effects in relation to accessibility to services and facilities throughout south Wales from the in-combination effects of proposed enhancements to cross-boundary public transport through the Cardiff City Deal. The County will also benefit in this respect from its links to England; Herefordshire to the north-east, South Gloucestershire and the Forest of Dean District to the east (on the other side of the River Wye), with links to South Gloucestershire via the Severn Bridge. Any cross-boundary sustainable transport improvements will make it easier to access existing services and facilities available at higher tier settlements, including those further afield at Newport, Cardiff, and Bristol, even in locations where the level of growth proposed may not support widespread provision of new local facilities.

## **Health and wellbeing**

### **Appraisal of the preferred strategy**

- 9.30 A key aspect of achieving positive health and wellbeing outcomes through new development is the extent to which residents are able to make healthy travel choices for accessing key services, facilities, and employment. In practice this means locating development within reasonable walking or cycling distance of such facilities and linking it with suitable walking and cycling infrastructure to connect new development with existing services. In the absence of a strategy underpinned by a suite of specific site options it is challenging to draw detailed conclusions in this respect.
- 9.31 Policy S7 does however identify three preferred strategic development sites in the County's main settlements of Abergavenny, Chepstow and Caldicot (including Severnside). While a level of uncertainty remains in terms of specific additional sites required to fulfil the housing requirement set out in the Strategy, it is considered that these will be identified in the Deposit Plan. The final

selection of sites for the Deposit Plan will be dependent on further detailed assessment work.

- 9.32 The Preferred Growth Strategy (Policy S1 and S2, supplemented by S7) provides a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, 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 and responding to the climate and nature emergency; whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040 and the phosphate constraint in the Upper River Wye catchment.
- 9.33 By virtue of directing the majority of growth to settlements in the two highest tiers of the settlement hierarchy the preferred strategy is likely to focus growth at locations which offer the potential for sustainable access to local services and facilities. For example, much of the growth directed to Abergavenny (including strategic site allocation Abergavenny East) will likely be delivered within around 1.5 miles of the town centre, which is considered to be a reasonable cycling distance. Correspondingly, by directing a proportionately small amount of growth to Tier 3 and 4 the preferred strategy avoids significant growth at smaller settlements which are likely to have a higher rate of car dependency. This is consistent with the RLDP objective of enabling healthier lifestyles.
- 9.34 In relation to the largest of the strategic site allocations, Caldicot East, while the site has good proximity to local services, positive effects will also be delivered through the proposed 'retail and leisure' uses alongside housing and employment. This reflects the strategic nature of the site (1460 homes, of which 925 are delivered within the plan period), and will support sustainable, healthy communities.
- 9.35 The Preferred Strategy also performs well by directing growth to locations with good potential for accessing services via healthy transport options. While the actual degree of walking and cycling connectivity will partly be determined by detailed matters of design and layout, it is considered that in spatial terms, broadly positive effects can be concluded.
- 9.36 The exception to this relates to Monmouth and other settlements in the Upper River Wye Catchment Area. The absence of new homes, employment, and infrastructure provision in these areas will likely exacerbate existing deficiencies seen in relation to community and recreational facilities, and more widely, sustainable communities. This could lead to a deterioration in health and wellbeing of residents, and could contribute to rural isolation in certain areas, notably within smaller rural settlements.
- 9.37 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.
- 9.38 Consideration is also given under this ISA theme to the impact of the Covid-19 pandemic. Building Better Places Wales acknowledges the behavioural shift of increased cycling and walking activity, and new working from home patterns



which have reduced overall need to travel. The RLDP policy framework seeks to maximise opportunities and further secure in the long-term this positive transport modal shift, kick started by the Covid-19 pandemic, from the car to active travel car-free journeys. Strategic Policy 9 (Sustainable Transport) performs particularly positively in this respect.

- 9.39 Policy S9 (Sustainable Transport) stands out as being of particular significance in relation to health and wellbeing as it includes an explicit requirement for development proposals to “*reduce the need to travel*” and “*increase provision for walking and cycling*”. The policy identifies that the existing Active Travel Network in Monmouthshire will need enhancing and expanding to ensure that walking and cycling are effectively promoted. The Active Travel Network is established by the Active Travel (Wales) Act 2013 and requires authorities to seek continuous improvement in cycling and pedestrian infrastructure. This means the policy is underpinned by a strong legislative platform which could act as an effective hook for ensuring developers design-in walking and cycling connectivity to the existing network when delivering new developments. Delivery and enhancement of Green Infrastructure through the development process as per Policy S17 is likely to be an important element of boosting walking and cycling.
- 9.40 Other strategic policies likely to have a direct effect in relation to health and wellbeing are Policy S3 (Sustainable Placemaking & High Quality Design), Policy S11 (Community and Recreation Facilities), and S17 (Green Infrastructure, Landscape and Nature Conservation).
- 9.41 Policy S11 (Community and Recreation Facilities) offers support in principle for development proposals which provide or enhance community facilities, the definition of which includes GP surgeries and health centres. Similarly, the policy establishes a presumption against the unjustified loss of such facilities. It is considered that the policy is relatively passive, i.e., simply supports such facilities coming forward rather than actively seeks their provision. However, in the context of Monmouthshire, where the need for growth is not acute, this is considered a proportionate approach.
- 9.42 Policy S3 (Sustainable Placemaking & High Quality Design) could help support health and wellbeing by promoting the “*co-location of uses in order to maximise opportunities for active travel*”. This is understood to mean delivering a mixed range of services and facilities across the different use classes at the same accessible location so that residents only need to walk or cycle to one place to access retail, employment, leisure and so on.
- 9.43 The importance of sustainable placemaking has been identified in the Building Better Places document. Policy priorities include placing greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Policy S3 is therefore anticipated to lead to positive effects in terms of creating and sustaining high quality, connected communities. Other policies likely to perform positively in this respect include Policy S10 (Town, Local and Neighbourhood Centres Hierarchy), Policy S11 (Community and Recreation Facilities), and Policy S18 (Green Infrastructure, Landscape and Nature Conservation).

- 9.44 It is also recognised that Monmouthshire is a largely rural plan area and in practice there will likely continue to be a degree of car dependency for many residents to reach some higher tier services and employment where these are not available locally. However conversely, the Preferred Strategy acknowledges the behavioural shift of increased working from home patterns, which has been brought about by the unprecedented impact of the Covid-19 pandemic. Collectively, it is considered that the preferred strategy will have a minor positive effect in relation to health and wellbeing.

## Summary appraisal of the Preferred Strategy

- 9.45 Focus new development associated with the Preferred Strategy on the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area, together with a sustainable amount of growth to the most sustainable lower tier settlements, will lead to positive effects against this ISA theme. The Strategy will enable the provision of market and affordable housing in both urban and rural areas and, importantly, provide the opportunity to address the unbalanced demography, improve labour force retention by retaining/ attracting younger adult population age groups, and assists in addressing the County's housing affordability challenge.
- 9.46 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.
- 9.47 Positive effects are also anticipated through the delivery of strategic development within the higher tier settlements, where there is greater need and better access to sustainable transport modes and wider infrastructure. This will likely present opportunities to link new development with the existing walking, cycling and Green Infrastructure networks at each of the settlements, whilst also offering potential to secure enhancements to these networks through the development process. 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, recognising that placemaking is considered to be a core value in the Covid-19 recovery in Wales.
- 9.48 It is also recognised that Monmouthshire is a largely rural plan area and in this context many of the smaller settlements which are allocated a small proportion of growth are unlikely to support walking and cycling access to services. Despite this it is important that such settlements receive the benefits of modest growth to sustain their vitality and although the Tier 3, 4 and 5 settlements are unlikely to support healthy travel options or access to healthcare facilities, collectively they are allocated only 14% of the residential growth. In light of this it is considered appropriate that some growth is directed to the rural settlements.

- 9.49 Where possible the Preferred Strategy supports growth at locations from which goods, services, and local employment could potentially be reached via healthy travel options, subject to detailed matters of site design and layout. It also directs the majority of housing growth to settlements with the widest range of healthcare facilities, committing to the delivery of new provision alongside strategic sites, and requiring that facilities are enhanced as necessary through the development process. This will ensure a continued high-quality service of the County Borough's resources. It is therefore considered that the Preferred Strategy will have a **long-term positive effect** on health and wellbeing. However, it is not possible to conclude if effects will be significant at this stage, given the precise location and scale of a proportion of the spatial strategy is not currently known. This will influence the significance of residual effects.

## Appraisal of cumulative effects

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

## Equalities, diversity, and social inclusion

### Appraisal of the Preferred Strategy

- 9.52 The focus of the equalities, diversity, and social inclusion ISA theme is reducing poverty and inequality, tackling social exclusion, and promoting community cohesion. Many aspects of equalities, diversity and social inclusion do not have a spatial dimension and are unlikely to be directly affected by the spatial distribution of growth through the Preferred Strategy. For example, promoting community cohesion is likely to be most directly influenced through detailed policies which have the granularity to deliver focused responses at specific locations.
- 9.53 However, it is considered that focusing new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow, and Caldicot

including the Severnside area, together with a sustainable amount of growth to the most sustainable lower tier settlements, will help to support and sustain a hierarchy of vibrant centres across the County. The delivery of strategic site allocations in particular will support the growth of and regeneration of existing communities, and improving access to housing, jobs and services.

- 9.54 Channelling an appropriate level of growth to the County's most sustainable rural settlements is also considered to lead to positive effects, enabling local people to remain in their communities rather than have to seek opportunities for housing and employment elsewhere.
- 9.55 However, it is difficult to conclude that growth in rural settlements and rural areas will address existing deprivation in terms of access to jobs, healthcare and opportunities as the distribution set out in Policy S2 (8% across Tiers 3 and 4) means growth will be unlikely of a scale which unlocks significant investment or enhancement in these areas. On balance, it is considered that the scale and distribution of growth is likely to have a minor positive effect in relation to equalities, diversity, and social inclusion.
- 9.56 It is 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 without housing, employment and infrastructure delivery, these locations may experience increased levels of inequality, isolation, and deprivation, particularly in the more rural settlements. While this would likely lead to lead to negative effects in the north east of the County Borough, it is 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.
- 9.57 Affordable housing provision is a key issue for the County and forms an integral part of the overarching Strategy with 50% provision being sought on all new site allocations (Policy S6). This provision, as well as potential policy intervention to ensure the market sector housing provides a suitable range and mix of house sizes, will assist in attracting and retaining a younger, economically active population and balancing the ageing population.
- 9.58 Other strategic policies most likely to have indirect effects on equalities, diversity and social inclusion are Policies S3 (Sustainable Placemaking & High Quality Design), S5 (Infrastructure Provision) and S6 (Affordable Housing).
- 9.59 There is clearly an economic and educational dimension to tackling poverty and exclusion as it is critical that people are given the opportunity to acquire skills and education which empowers them to enter the workplace and find stable, high-quality employment. In this sense Policy S5 (Infrastructure Provision) could potentially play a role through the requirement to provide "*new or improved infrastructure and facilities to remedy deficiencies*" given that this includes education facilities. However, where deficiencies in provision currently exist it is not clear whether the policy would be effective in addressing the existing shortfall as well as providing additional capacity for new development, or whether this simply means existing provision would be deficient once additional growth is added. Effects are uncertain in this respect.

- 9.60 Placemaking can play a role in tackling social exclusion through well designed, barrier-free environments which can be entered and used safely and with dignity by all members of the community. Policy S3 (Sustainable Placemaking & High Quality Design) seeks sustainable places which support community wellbeing, including through the implementation of “*safe and inclusive design that offers ease of access for all*” and could have potential for minor positive effects.
- 9.61 Access to a range of types and tenures of genuinely affordable housing is an important element of tackling poverty and social exclusion. Policy S6 (Affordable Housing) will therefore be a key lever by which affordable housing is delivered in Monmouthshire. The supporting text of the policy recognises that certain groups within the community are often particularly in need of affordable housing, such as elderly people and younger age groups who may otherwise not be able to afford to continue living locally. In the context of Monmouthshire where average house prices are significantly above the average for Wales it will be of great importance that a sufficient range and choice of affordable housing is delivered which enables people to remain living in their community if they wish to do so. In principle, long term positive effects are considered likely.

## Summary appraisal of the Preferred Strategy

- 9.62 The focus of growth on the primary settlements, together with a sustainable amount of growth to the most sustainable lower tier settlements, 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 (reflecting the Sustainable Settlement Appraisal<sup>25</sup>) will be an important aspect of tackling inequalities and deprivation within Monmouthshire in terms of ensuring access to employment, education, and services at or near where the need for them arises. The Preferred Strategy also includes policy requirements which could help to deliver new or enhanced infrastructure, including education and training, across the plan area to help address deficiencies in provision. Additional policy requirements could help to create and sustain accessible, inclusive places through the development process which promote social inclusion and remove barriers to access.
- 9.63 However, at this stage of plan making details on some key aspects of tackling inequality remain uncertain. It is difficult to measure the potential effects of the Preferred Strategy on protected characteristics<sup>26</sup> who are particularly affected by poverty, inequality, and social exclusion as the degree of effect could vary between these groups. Nevertheless, directing housing development at the settlements with the highest levels of housing need is considered to be positive.
- 9.64 Positive effects in this respect are reflected through the strategic site allocations, delivering significant new affordable 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.
- 9.65 Additionally, consideration is given to the phosphate constraint in the Upper River Wye catchment. Development is not directed to Monmouth, nor other

<sup>25</sup>

<sup>26</sup> The following are protected characteristics under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

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.

- 9.66 Overall, while it is likely that the Preferred Strategy will lead to **long term positive effects** on equalities, diversity, and social inclusion, it is not possible to conclude whether effects will be significant at this stage. This is given the precise location and scale of a proportion of the spatial strategy is not currently known. This will influence the significance of residual effects.

## Appraisal of cumulative effects

- 9.67 Addressing the equalities, diversity and social inclusion objectives is not considered to be a primarily spatial matter. In this sense there are unlikely to be significant cumulative effects from development proposed in the Preferred Strategy and development in surrounding authorities.
- 9.68 However, there is a degree of cross-cutting between the equalities theme and other ISA themes, particularly in relation to the role of affordable housing and educational opportunities in tackling entrenched poverty and deprivation. In this sense the fact that Monmouthshire and its regional partners are all proposing meeting or exceeding their housing need could be perceived as a positive, as it could offer opportunities to meet complex housing needs within particularly deprived communities, particularly in post-industrial settlements which have struggled over time to develop their economic vitality.
- 9.69 Additionally, it is recognised that the proposed enhancements to regional public transport through the Cardiff Capital Region City Deal and SE Wales Metro rollout will have potential to ease access to employment and training opportunities as well as services more broadly. Increased accessibility could have potential to reduce social exclusion and reduce some dimensions of deprivation.
- 9.70 It is considered that cumulative effects in relation to equalities, diversity and social exclusion are likely to be a minor positive effect overall. Although elements of tackling entrenched deprivation and inequality are likely to be influenced by targeted action addressing specific needs at a local level, the collective action of authorities at a regional scale is likely to deliver similar benefit, or potentially even greater benefit, from all the investment being stimulated through the Cardiff City Deal and other regional LDPs.

## Transport and movement

### Appraisal of the Preferred Strategy

- 9.71 The transport and movement ISA objectives include improving access to jobs and services, reducing private vehicle use through promoting active travel and encouraging modal shift, and improving access to high speed digital infrastructure. The Spatial Strategy seeks to maximise the opportunities presented by the Covid-19 pandemic, and subsequent behavioural shift seen in people's commuting patterns, such as increased working from home.



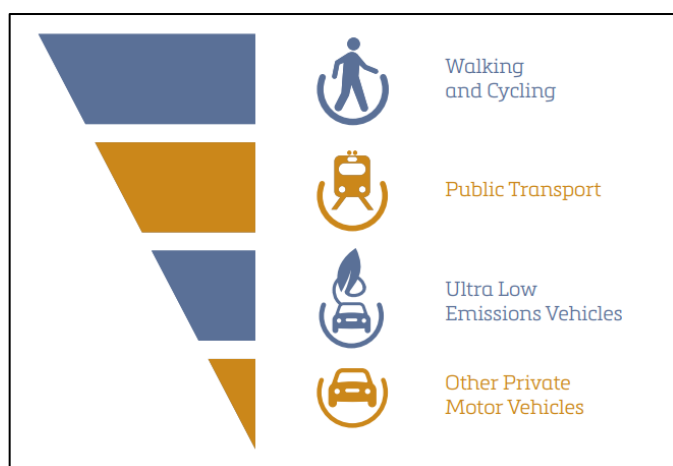
- 9.72 The distribution of growth proposed by the Preferred Strategy (as set out earlier in this Chapter) performs reasonably positively in relation to the first of these objectives as it capitalises on existing transport links at the higher tier settlements to direct growth to locations served by transport hubs. By focusing new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow, and Caldicot including the Severnside area, the strategy ensures that new residential development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Bristol and Newport. Similarly, new employment growth in these Tier 1 settlements will be accessible by train.
- 9.73 However, development is not directed to Tier 1 settlement Monmouth, nor other settlements in the wider Upper Rye catchment area in light of unresolvable water quality issues. 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.
- 9.74 Underpinning the spatial strategy are three preferred strategic site allocations, proposed through Policy S7 in Abergavenny, Chepstow and Caldicot (including Severnside). All sites perform well in terms of improving access to jobs and services, including sustainable transport. For example, strategic sites at Abergavenny and Chepstow benefit from train stations served by frequent services. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 9.75 Similarly, strategic growth focussed at Caldicot (including the Severnside area) is positive in transport terms given that the area is served by two train stations. Both stations are within close proximity of each other at Rogiet and Caldicot, and it is also considered that given the level of growth proposed (1460 dwellings, 925 in the plan period), supporting infrastructure for the site would be extensive. As discussed in Appendix C, while the exact supporting infrastructure to be provided is currently uncertain, it is considered that this is likely to relate to the transport network to some extent (including sustainable transport offer). Specific details are to be provided within the Infrastructure Plan which will be developed to support the Deposit RLDP.
- 9.76 Any infrastructure delivery would also support the far west of the Severnside area (including Magor) which is currently limited in terms of practical walking or cycling options for accessing either train station. It is further noted that the new South Wales Metro plan designates Magor as a location for a rail station (Magor Walkway Station). While uncertainty remains in terms of the infrastructure likely to be delivered as part of strategic site allocation Caldicot East, it is considered that directing growth here as opposed to locations with very limited public transport is clearly positive.
- 9.77 While strategic growth at Abergavenny, Chepstow, and Caldicot, is anticipated to lead to positive effects, it is recognised that additional sites are required to fulfil the housing requirement set out in the Strategy. It is therefore challenging to draw detailed conclusions in terms of improving access to specific jobs and services opportunities outside of the strategic growth locations.

- 9.78 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the Preferred Strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the Preferred Strategy is unlikely to have a positive effect in relation to the majority of inter-settlement travel.
- 9.79 The priority for the 'reduction in the need to travel' and a shift away from the private car for travel is reflected in the Welsh Government's Future Wales: The National Plan 2040 and 'Llwybr Newydd – The Wales Transport Strategy 2021'. The RLDP seeks to establish the foundations to encourage longer term changes to the historic high level of car usage in Monmouthshire. The spatial strategy therefore focuses development in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, that provide opportunities for a reduction in travel and provide opportunities for sustainable transport (see Sustainable Settlement Appraisal (2021)).
- 9.80 However, Monmouthshire is predominantly a rural County and as set out in Future Wales Policy 5, there are clearly significant disparities between urban areas with regard to the feasibility of delivering effective and public transport systems and active travel routes. To address this, LLwybr Newydd: the Wales Transport Strategy has committed to a 'Rural Pathway' which sets out how regional Corporate Joint Committees (CJCs) and Welsh Government policy makers will work together on strategies to tailor solutions to extend the geographical reach of public transport links into rural areas. This is reflected through Policy S9, which supports development in rural areas where it "*enables solutions to rural transport problems.*" It is considered that the Deposit Plan will safeguard sites necessary to deliver the key transport measures and schemes identified in National, Regional and Local Transport Plans.
- 9.81 The behavioural shift in people's commuting patterns throughout the Covid-19 pandemic is also recognised through the Preferred Strategy. It aims to build on the increased cycling and walking activity and working from home patterns, as highlighted through the Welsh Government's Building Better Places document. The Strategy seeks to maximise opportunities and further secure in the long - term this positive transport modal shift, kickstarted by the Covid-19 pandemic, from the car to active travel car-free journeys. Distributing growth based on the settlement hierarchy (Policy S2) is anticipated to lead to long term positive effects in this respect, enabling the delivery of sustainable and resilient communities.
- 9.82 Other strategic policies most likely to have an effect in relation to the transport and movement ISA theme are S3 (Sustainable Placemaking & High Quality Design), S5 (Infrastructure Provision), S10 (Town, Local and Neighbourhood Centres) and S12 (Employment Sites Provision).
- 9.83 Of these, as briefly introduced above, Policy S9 (Sustainable Transport) is likely to have the most direct positive effects in relation to transport and movement.



The policy establishes a presumption in favour of development which accords with the PPW11's Sustainable Transport Hierarchy (see Figure 10.2 below). Where sites are available to support this approach, this will help embed sustainability and accessibility into new development by integrating walking and cycling and public transport access into the location, design, and layout of new schemes. This principle is supported by other strands of the policy. Bullet point 3 says that development proposals should promote active travel through "*safeguarding, enhancing and expanding on the Active Travel Network*", whilst bullet points 5 and 6 state that development should help improve road safety and minimise the adverse effects of parking, both of which could play a role in incentivising and enabling more widespread take up of walking and cycling.

**Figure 10.2 Sustainable Transport hierarchy for Planning<sup>27</sup>**



## Summary appraisal of the Preferred Strategy

- 9.84 The Preferred Strategy gives great weight to the Active Travel Network and the importance of directing growth to locations which can either integrate with the existing network or enhance and extend the existing network in order to link with services and facilities. Growth is being focused to the primary settlements of Abergavenny (including Llanfoist), Chepstow, and Caldicot including the Severnside area, where there is better access to sustainable transport modes and wider infrastructure. The distribution of growth also enables the Preferred Strategy to take advantage of the proposed South East Wales Metro rollout to Chepstow, Abergavenny and Severnside, though full integration into the Metro network may not be implemented until later in the plan period.
- 9.85 While the Metro rollout also includes Monmouth, it is recognised that growth is restricted in this location, along with the wider Upper River Wye Catchment area. 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.
- 9.86 The Preferred Strategy looks to capitalise on Monmouthshire's strategic location within the Cardiff Capital Region, its strategic location between the Great

<sup>27</sup> Welsh Government (2021), 'Planning Policy Wales: Edition 11' [online], available at: [https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

Western Cities and SW/Bristol region, and its access to the M4, M48 and mainline rail corridors which is an important element in ensuring the plan area's continued integration into the Cardiff Capital Region and beyond.

- 9.87 Consideration is also given through the Preferred Strategy to Welsh Government's Building Better Places paper, and the role active travel and digital connectivity plays in the County's recovery from Covid-19, and opportunities presented to support effective sustainable travel habits.
- 9.88 Overall, the Preferred Strategy is predicted to have a **significant long term positive effect** on the transport and movement theme. At a strategic scale it takes advantage of opportunities arising from the Cardiff Capital Region City Deal and South East Wales Metro proposals, whilst at a settlement specific scale it provides for opportunities to enhance and extend the Active Travel Network and integrate new development into it. This is particularly the case in relation to the preferred strategic site allocations and their supporting infrastructure likely to be delivered given the economy of scale.

## Appraisal of cumulative effects

- 9.89 There is potential for both negative and positive cumulative effects in relation to transport and movement, particularly in relation to cross boundary roads and railways which stand to be impacted by development both within Monmouthshire and regionally.
- 9.90 Existing travel patterns in Monmouthshire reflect its rurality, particularly a trend for relatively long travel to work distances, high levels of car ownership and reliance on the private car. The primary points of road congestion in the region are on the M4, with the recent South East Wales Transport Commission Final Recommendations Plan (2020) highlighting that *"there is an acute congestion problem on the M4 in South East Wales, particularly on the approach to the Brynglas tunnels. The single biggest cause – by some margin – is the sheer traffic volume at peak times, especially associated with commuting"*.<sup>28</sup> The 2019 decision not to progress an M4 relief road<sup>29</sup> circumventing the Newport tunnel bottleneck could have effects in-combination with growth at Monmouthshire, Newport and in the West of England resulting in additional congestion over time. This in turn could increase the duration of car and HGV journeys between south Monmouthshire, Newport, and Cardiff. It is however recognised that the Final Recommendation Plan (2020) sets out a number of recommendations to address the M4 congestion, which may reduce adverse effects in the long term.<sup>30</sup>
- 9.91 The adopted Newport LDP (2015) safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road and the North South Link. Whilst these proposals will likely contribute to easing localised congestion issues, there could also be potential for increased traffic along the M4, A4042 and A449 as a result of growth within Newport.

<sup>28</sup> South East Wales Transport Commission (2020) Final recommendations [online] available at:

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

<sup>29</sup> Welsh Government (2019) 'M4 corridor around Newport: decision letter' [online], available at: <https://gov.wales/m4-corridor-around-newport-decision-letter>

<sup>30</sup> South East Wales Transport Commission (2020) Final recommendations [online] available at:

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

- 9.92 Additionally, growth in the Heads of the Valleys, while likely to boost the regional economy, could lead to increased pressure on the road network, particularly the A465. However, it is noted that the A465 has recently undergone significant enhancement, including dualling of the carriageway in places, and capacity has therefore been boosted.
- 9.93 Links to Herefordshire Council and Forest of Dean District Council could also lead to increased congestion in Monmouthshire's key settlements in the south/east. Notably there is an existing commuter flow of residents from the south of the Forest of Dean along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48, both of which are trunk roads for these relevant stretches through Monmouthshire. Additional development between Lydney and Chepstow could exacerbate existing traffic issues in Chepstow. It is however recognised that the Forest of Dean Local Plan will likely offer measures which will mitigate the increase in congestion around Chepstow.
- 9.94 Cumulative effects in relation to public transport are projected to be largely positive, as future growth of the Cardiff City Region is underpinning the business case for the SE Metro rollout. This includes enhanced heavy rail connectivity between Cardiff and Abergavenny and Chepstow. In the context of early uncertainties around the extent of the SE Wales Metro rollout, growth proposed in the neighbouring authorities within the Cardiff City Region contribute to this positive cumulative effect through the introduction of additional users of the network to create a robust business case for expansion.

## Natural resources (air, land, minerals, and water)

### Appraisal of the Preferred Strategy

- 9.95 In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.<sup>31</sup> The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Chepstow and Usk for NO<sub>2</sub>.<sup>32</sup> Policy S1 (Preferred Growth Strategy) sets out the Preferred Strategy approach to focus new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area, together with a sustainable amount of growth to the most sustainable lower tier settlements. This is in-combination with the outcome of the Sustainable Settlement Appraisal (2021). The Appraisal established a sustainable settlement hierarchy that reflects those communities best placed to accommodate sustainable growth based on accessibility to sustainable transport, the availability of local services and the level of employment opportunities.
- 9.96 Focusing growth towards the most sustainable communities is likely to lead to positive effects in terms of supporting levels of self-containment in the higher tier settlements, reducing the need to travel where possible, and subsequently reducing levels of NO<sub>2</sub>. However, as a Tier 1 settlement, Policy 2 (Spatial

<sup>31</sup> World Health Organisation (2019) Ambient air pollution: Health impacts <https://www.who.int/airpollution/ambient/health-impacts/en/>

<sup>32</sup> Air Quality in Wales (2019) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

Distribution of Development - Settlement Hierarchy) states that around 769 dwellings will be directed to Chepstow during the plan period, which has the potential to exacerbate NO<sub>2</sub> levels within the AQMA through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. This includes strategic site allocation Bayfield, Chepstow, which is located in the north west of Chepstow close to the A466, and approximately 1.8km (21-minute walk) from Chepstow Train Station on foot.

- 9.97 Conversely, it is noted that Policy SP2 identifies Usk as a secondary settlement (along with Raglan and Penperlleni), with only 380 dwellings distributed between these settlements. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2016), and subsequently through the South East Wales Transport Commission Final Recommendations Plan: November 2020. This will inform the Deposit RLDP.<sup>33, 34</sup>
- 9.98 It is noted that the Preferred Strategy, through Policy S2, directs around 2,611 dwellings to the Severnside Area. This includes 1,460 homes at strategic site Caldicot East (of which 925 will be delivered within the Plan period). Delivering strategic growth to the South of the County has the potential to lead to positive effects through capitalising upon the strategic links to the Great Western Cities, Cardiff Capital Region, and SW/ Bristol region. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which may provide opportunity for building more sustainable communities and improved air quality in the South of the County. Furthermore, it is recognised that the strategic site allocation will deliver supporting infrastructure alongside housing, which is likely to include active and sustainable travel improvements, supporting self-containment and reduced reliance on the private vehicle. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 9.99 More broadly, it is considered that the programme outlined in the LTP (2016) will support sustainable communities across the County; including through the delivery of walking and cycling infrastructure, bus network improvements, station and highways improvements, Cardiff Capital Region Metro schemes, 20mph limits and road safety schemes. This coincides with higher level policy frameworks, and in accordance with Welsh Government guidance it does not contain specific rail service and trunk road proposals.
- 9.100 It is recognised that the LTP is being updated and will inform the Deposit Plan, as reflected through the Preferred Strategy policy framework. Strategic Policy S9 (Sustainable Transport) states that “*The Deposit Plan will safeguard sites necessary to deliver the key transport measures and schemes identified in National, Regional and Local Transport Plans.*”
- 9.101 Policy S9 also sets out a list of specific facilitation tasks for development to promote sustainable, safe forms of travel including “*ensuring developments incorporate and/or enable the use of Ultra Low Emission Vehicles (ULEVs) by providing the necessary underlying infrastructure*”. This will contribute positively

<sup>33</sup> Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

<sup>34</sup> South East Wales Transport Commission (2020) South East Wales Transport Commission: Final Recommendations Plan [online] available at: <https://gov.wales/south-east-wales-transport-commission-final-recommendations>

towards reducing atmospheric levels of NO<sub>2</sub> and improving air quality within the County.

- 9.102 The uptake of sustainable travel to improve air quality is further supported through Policy S5 (Infrastructure Provision) and Policy S3 (Sustainable Placemaking & High Quality Design); which requires development proposals to *“Incorporate an appropriate mix of uses to minimise the need to travel and to maximise opportunities for active travel and public transport use”*.
- 9.103 Monmouthshire is a predominantly rural County, and it is therefore acknowledged that the brownfield land resource is particularly limited. In line with Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), the majority of growth is being directed to the Tier 1 Settlements, with the intention of utilising brownfield land where possible. This will contribute positively towards meeting the ISA objective to *“...maximise opportunities for development on previously developed land”*.
- 9.104 In terms of specific loss of greenfield land, the spatial strategy performs negatively as a result of strategic site allocations at Abergavenny, Chepstow, and Caldicot. However, as highlighted earlier within this Chapter, outside of the Strategic Sites, smaller sites/ allocations are not identified at this stage, and it is therefore difficult to predict or draw definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to the loss of greenfield land.
- 9.105 Nonetheless, it is considered that the delivery of strategic development on greenfield sites in the primary settlements and Severnside, coupled with the broader lack of brownfield supply across the County, will likely lead to residual significant negative effects against this ISA theme. While the focus on re-use/ redevelopment of brownfield sites in the Tier 1 Settlements will support the delivery of positive effects in this respect, there is anticipated to be a net loss of greenfield land overall. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.
- 9.106 In terms of agricultural land quality throughout Monmouthshire, it is recognised that there is a high percentage of best and most versatile agricultural land (i.e., Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e., Grade 3b, 4 and 5). The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988). This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:
- Primary Settlements: these are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high-quality Grade 2 land and non-agricultural land are present around Chepstow. Severnside is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor/ Undy, and north of Sudbrook.



- **Secondary Settlements:** these areas include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east/ and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- **Main and Minor Rural Settlements:** these areas are particularly constrained, being located outside of the main settlements where there is a significant amount of BMV agricultural land. This reflects the rural nature of the County. It is noted that the Preferred Strategy does not yet establish where growth may be located in the County's rural areas.

- 9.107 In terms of the Preferred Strategy, it is considered that directing a significant proportion of growth to the Tier 1 settlements (Strategic Policy S2) will protect best and most versatile agricultural land where possible. This is in accordance with PPW 11, which states that *"agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future."*<sup>35</sup> However, as set out in the RLDP, the widespread distribution of BMV agricultural land (surrounding all settlements to some extent) means that development anywhere in the County will likely lead to residual adverse effects.
- 9.108 As discussed above, and within Appendix C, the delivery of strategic sites within Abergavenny, Chepstow and Caldicot will likely result in the loss of BMV agricultural land. Based on the Predictive ALC model for Wales (2017), 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 Bayfields 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.
- 9.109 However, as all other site allocations are not 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 specific loss of BMV agricultural land. It is however noted that the RLDP states that *"a key consideration in assessing the Candidate Sites will be the high percentage of BMV agricultural land within Monmouthshire."* An agricultural land classification Background Paper will be produced at the Deposit RLDP stage, adopting a sequential approach to assessing loss of BMV agricultural land as set out by PPW. Every effort will be made to, where possible, protect the higher grades of BMV land; and to avoid/ or minimise the loss of BMV land. This will contribute positively towards meeting the ISA objective to *"promote the efficient use of land"*. As set out in the beginning of this Chapter, consideration will be given to the Candidate Sites in due course.
- 9.110 While there is no specific policy which relates to the use of previously developed land and protection of best and most versatile agricultural land, it is considered that this will be reflected through site specific policies and is adequately addressed though PPW (2021).
- 9.111 In terms of the County's mineral resource, the latest South Wales Regional Aggregates Working Party (SWRAWP) Annual Report (2018) establishes that at the end of 2018 Monmouthshire had a greater than 50 year's supply of crushed rock reserves, which are situated at the inactive limestone quarry at Ifton Quarry,

<sup>35</sup> Welsh Government (2018) Planning Policy Wales Edition 10 para. 3.45  
<https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

Rogiet.<sup>36</sup> In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within the RLDP. A revised Regional Technical Statement (RTS) - 2nd Review was published in 2020. The 2nd Review (RTS2) makes recommendations for the apportionments necessary to ensure an adequate supply of crushed rock, including the nationally recommended minimum provision of 7 and 10 years, are available for the entire duration of the RLDP. The total apportionments required for Monmouthshire are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as of 31st December 2016). Reflecting the significant unworked permitted reserves of Limestone at the inactive quarry at Ifton. When compared against the apportioned requirement as set out in the RTS2, Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP when determined on a Local Planning Authority basis.

- 9.112 Whilst it is considered that there would be no negative impact on Monmouthshire's mineral resource through the Preferred Strategy as mineral landbank obligations can be met, the Preferred Strategy does have the potential to impact upon the Limestone Mineral Safeguarding Area (MSA) present in parts of the south of the County.<sup>37</sup> Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) directs around 2,611 dwellings towards the Severnside area in the south of the County, including through the delivery of strategic site allocation Caldicot East. The Council will therefore need to be mindful of the potential effect that development could have on the MSA. While at this stage no specific details are provided in terms of supporting infrastructure provision and policy requirements for the strategic site, it is considered that in accordance with national and regional policy requirements, a sustainable approach to minerals planning will be adopted.
- 9.113 This is anticipated to be the case for all development sites when allocated at the Deposit stage. In this context, Policy S17 (Minerals) states that the Council will *"safeguard known / potential sand and gravel and limestone resources for future possible use"* in addition to *"maintaining a minimum 10 year land bank of crushed rock and 7 years land-based sand and gravel reserves throughout the plan period in line with national guidance"*.
- 9.114 Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The total demand for water for this WRZ is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. The

<sup>36</sup> South Wales Regional Aggregates Working Party (2019) Annual Report 2018 <http://www.swrawp-wales.org.uk/Html/SWRAWP%20Annual%20Report%202017%20FINAL.pdf>

<sup>37</sup> North Wales and South Wales Regional Aggregates Working Parties (2014) Regional Technical Statement - 1st Review <https://www.merthyr.gov.uk/media/4451/sd44-south-wales-regional-aggregates-working-party-regional-technical-statement-1st-review-august-2014.pdf>

SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.

- 9.115 Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every five years to take account of predicted growth and ensure that there are schemes in place to meet future demands.
- 9.116 In terms water quality, following new evidence about the environmental impacts of phosphates in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for river water quality and has assessed the nine riverine Special Areas of Conservation (SAC) in Wales. Within Monmouthshire, it was identified that 88% of the River Usk's water bodies failed to meet the required target and within the River Wye 67% failed to meet the required target. As a result of this failure NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. The spatial strategy has regard to this latest position on the phosphates water quality issue and associated requirements to demonstrate neutrality or betterment when proposing development. The strategy has been developed following ongoing discussions with NRW and Dŵr Cymru Welsh Water on future strategic solutions for phosphate mitigation within the river catchment areas.
- 9.117 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. The spatial strategy therefore performs positively by directing growth away from the River Wye catchment area; an appropriate step to ensuring that the environmental capacity and water quality of the river does not deteriorate any further.
- 9.118 In accordance with PPW (2021) development coming forward through the Preferred Strategy will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. PPW (2021) states that *"New development should be located and implemented with sustainable provision of water services in mind, using design approaches and techniques which improve water efficiency and minimise adverse impacts on water resources, including the ecology of rivers, wetlands and groundwater and thereby contributing towards ecological resilience"* This is reinforced through Preferred Strategy Policy S4 (Climate Change) which requires all development proposals to *"Incorporate water efficiency measures and minimise adverse impacts on water resources and quality"*. This will contribute positively towards meeting the ISA objective to *"promote the efficient use of natural resources including providing increased opportunities for water efficiency."*



## Summary appraisal of the Preferred Strategy

- 9.119 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.
- 9.120 Where possible, the RLDP will prioritise the re-use/ redevelopment of brownfield land, although it is recognised that such opportunities are limited in Monmouthshire. The Preferred Strategy seeks to protect BMV land and minimise its loss as far as possible through the Preferred Strategy; undertaking a sequential approach to the allocation of candidate sites. However, given the widespread nature of high quality ALC throughout the County, and direction of a significant proportion of growth to three large scale greenfield sites, it is considered that substantial loss of the County's soil resource is inevitable.
- 9.121 However, while there is a need to conserve natural resources, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. It is likely that the Preferred Strategy will have a long term negative effect on natural resources through the loss of greenfield and agricultural land; however, it is not possible to conclude it will be significant at this stage. The precise location of development is not currently known and will influence the significance of residual effects.
- 9.122 In terms of mineral resources, it is considered that neutral effects are anticipated given there are no existing capacity issues, and the higher level policy frameworks in place respectively.
- 9.123 In relation to water resources, the spatial strategy has regard to the latest position on the phosphates water quality issue and associated requirements to demonstrate neutrality or betterment when proposing development. No new site allocations are considered in settlements within the upper River Wye catchment area, which will ensure that the environmental capacity of the rivers does not deteriorate any further. This is anticipated to lead to significant long term positive effects.
- 9.124 While there is a need to conserve natural resources, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Furthermore, in light of the preferred strategic development sites, the Preferred Strategy is predicted to have a **significant long term negative effect** on natural resources through the loss of substantial greenfield and agricultural land. A level of **uncertainty** however remains exists given the unknown location of all other site allocations.

## Appraisal of cumulative effects

- 9.125 There is the potential for a cumulative loss of greenfield land and BMV agricultural land as a result of the distribution of housing to meet the need of the wider South Wales region, and neighbouring English authorities. Development proposed through the Preferred Strategy has the potential to interact with development proposed through neighbouring authority plans to result in cumulative significant loss of greenfield land and BMV agricultural land.
- 9.126 The County has regional obligations to be met in terms of Minerals planning, forming part of the former Gwent sub-region along with Torfaen, Newport, and Blaenau Gwent. However, when compared against the apportioned requirement as set out in the RTS2, (2020), Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP.
- 9.127 There is the potential for development proposed through the Preferred Strategy to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. HRA screening carried out for the Preferred Strategy (2022) investigates the potential for effects in this respect, highlighting that the Environment Agency's Review of Consents process sets wastewater discharge limits for WwTWs within Monmouthshire, while accounting for discharged effluent arising from development allocated within the Plans of adjacent authorities. The same also applies to the concept of nutrient neutrality, which emerges from the cumulative growth in all hydrologically linked authorities contributing phosphorus to the River Wye and River Usk. The HRA concludes that provided adequate phosphorus mitigation is identified and secured, there would be no adverse effects on the River Usk and the River Wye regarding water quality, in-combination with other Plans. This reflects the findings of HRAs of development plans of surrounding authorities (e.g. those of the Brecon Beacons National Park, Blaenau Gwent and Herefordshire).
- 9.128 More broadly, it is considered that water resources and wastewater treatment capacity are generally managed at a catchment level and there is close working between Natural Resources Wales, Welsh Water, and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the total demand for water in the County is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050, it is considered that the Preferred Strategy will not have a significant negative cumulative effect on this ISA theme.

## Biodiversity

### Appraisal of the preferred strategy

- 9.129 In terms of internationally designated sites, it is recognised that the plan area is particularly constrained. HRA screening (November 2022) of the Preferred Strategy policies found that the following European sites within 15km of Monmouthshire and impact pathways need to be considered in more detail through the Appropriate Assessment (AA) stage:

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

- 9.130 The HRA also explored potential impact pathways in relation to the three Preferred Strategic Site Allocations proposed in the RLDP. The HRA found that for all three Preferred Strategic Site Allocations, LSEs cannot be excluded, and they were subsequently screened in for AA.
- 9.131 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 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.”*
- 9.132 The ISA supports the HRA’s initial recommendations, which include the commissioning of further work to inform AA of recreational pressure in the Deposit Plan HRA, and the inclusion of additional policy text to ensure greater protection of the River Usk and Wye’s flow regimes. Furthermore, regarding the emerging issue of nutrient neutrality, it is recommended that the following policy wording (or similar) is inserted into an appropriate policy of the Deposit Plan to avoid adverse effects: *“Until the review of Wastewater Treatment Works (WwTWs) discharge permits has been completed, planning consent for new residential development will only be granted where development sites are identified as phosphorus neutral. Once revised discharge limits have been identified, new residential developments will need to ensure that new growth can be accommodated within these and that any required capacity upgrades are delivered within the agreed Asset Management Plan of the sewerage provider. Where allocated development exceeds the permitted headroom of a WwTW, the*

*development will be delivered in phases to ensure that the consented discharge is not exceeded.”*

- 9.133 The Preferred Strategy has regard to this latest position on the phosphates water quality issue, restricting development in the primary settlement of Monmouth and the wider Upper Wye catchment area. It is however noted that if a strategic phosphate solution is found for the upper River Wye catchment during the RLDP plan period, there is the potential for development to progress in Monmouth.
- 9.134 There is a range of nationally and locally designated biodiversity located around these settlements. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests.
- 9.135 The level of development proposed and directed to these areas under Policies S1 and S2 has the potential to result in impacts on the designated sites and wider biodiversity around these settlements. Policy S7 proposes that the strategic site allocations will contribute to the delivery of the housing and job growth set out in Policy S1. The three preferred strategic sites identified at this stage have been considered through the ISA process, with summary findings presented in Chapter 6 and detailed appraisals presented in Appendix C.
- 9.136 Of note, Abergavenny East, has the potential to lead to habitat loss and recreational disturbance of the nearby ancient woodland and habitats present within/ surrounding the site. There is also the potential for negative effects through the delivery of Caldicot East, given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 1.2km of the site, as well as the adjacent ancient woodland at Farthing Hill. It is also recognised that all three strategic sites are greenfield and therefore have the potential to hold biodiversity value. Notably, there are sparse mature trees present throughout Caldicot East which could be lost or damaged.
- 9.137 It is however considered that development proposals should seek to retain and enhance features where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national policy. Furthermore, the strategic nature of the sites present an opportunity to exceed the mandatory requirement of 10% net-gain, with the potential for significant long-term positive effects. It is recognised that further detailed assessment of the sites will inform specific design requirements, which will be presented within the Deposit RLDP.
- 9.138 There are a number of other policies that support or permit a type of development that could have impacts on designated or wider biodiversity interests but that do not specify a quantum or any sites/ locations. These include Policies S4 (Climate Change), S5 (Infrastructure Provision), S8 (Gypsy and Travellers), S11 (Community and Recreation Facilities), S12 (Employment Site Provision), S13(Rural Enterprise) and S14 (Visitor Economy).
- 9.139 There are also a number of policies that seek to protect or enhance the natural environment and will help to mitigate the impacts of proposed development on biodiversity. Policy S3 (Sustainable Placemaking & High Quality Design) states that development should “incorporate a Green Infrastructure led approach that

respects local distinctiveness and the character of the site and its surroundings". Policy S4 (Climate Change) requires development proposals to provide ultra-low emission vehicle charging infrastructure which will help to encourage their use and therefore indirectly have positive effects on biodiversity by helping to reduce emissions and improve air quality.

- 9.140 The Preferred Strategy states through Policy S5 (Infrastructure Provision) that planning obligations may be sought to secure improvements in infrastructure where necessary and that such obligations may include green infrastructure and ecological mitigation and enhancement. Policy S14 (Rural Enterprise) permits development outside settlement development boundaries to rural enterprise uses and the diversification of the rural economy, "where it is of a scale and type compatible with the surrounding area and will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value".
- 9.141 Strategic Policy S18 (Green Infrastructure, Landscape and Nature Conservation) requires development to, "Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscapes, biodiversity, public rights of ways and heritage assets", through six key functions. This includes "by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them". There is also a key function relating to greenspace provision that states that Green Infrastructure assets and opportunities are designed to deliver a multifunctional resource.

## Summary appraisal of the Preferred Strategy

- 9.142 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 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."*
- 9.143 The ISA supports the conclusions/ recommendations of the HRA AA, and it is considered that these will be adopted through the Deposit Plan.
- 9.144 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.

- 9.145 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.
- 9.146 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.

## Appraisal of cumulative effects

- 9.147 Development proposed through the Preferred Strategy has the potential to interact with and have cumulative effects on biodiversity with growth proposed in other areas outside the County. This includes development plans in surrounding LAs, such as Torfaen, Newport, Brecon Beacons National Park, and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance biodiversity.
- 9.148 As set out above it is noted that the BBNP authority has halted preparation of its RLDP.<sup>38</sup> The authority are investigating with NRW the permitting arrangements for Talgarth Wastewater Treatment Works and will recommence once obligations under the Habitats Regulations are met. As such, the scale and location of any future growth for the area is currently unknown.
- 9.149 Further HRA work will be carried out to address the likelihood for adverse effects on the integrity of any European designated sites as a result of development proposed through the RLDP acting in-combination with other plans and projects. The candidate site assessment process will consider the impacts of development at specific sites on biodiversity and this issue will also be considered further through the ISA process.
- 9.150 It will be important for Local Planning Authorities and stakeholders, such as NRW and Natural England, to work closely to identify potential cross-boundary issues and seek to protect and enhance ecological corridors that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver biodiversity net gain should be explored.

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<sup>38</sup> Brecon Beacons National Park Authority (2022) Planning: Phosphates [online] available at: <https://www.beacons-npa.gov.uk/planning/water-quality-phosphate-in-riverine-special-areas-of-conservation-and-implications-for-planning-and-development/>



## Historic environment

### Appraisal of the preferred strategy

- 9.151 As explained earlier in this Chapter, the majority of growth during the plan period is being directed towards the primary settlements of Abergavenny (including Llanfoist), Chepstow, and Caldicot including the Severnside area. There is a range of nationally designated heritage assets located within and around these settlements. Furthermore, the Blaenavon Industrial Landscape World Heritage Site is located to the south west of Abergavenny.
- 9.152 The level of development proposed and directed to these settlements under Policies S1 and S2 has the potential to result in impacts on the designated heritage assets and wider historic environment within and surrounding these settlements. Given the lack of brownfield sites it is likely that growth will broadly be delivered on greenfield sites.
- 9.153 Policy S7 (Preferred Strategic Site Allocations) identifies three large scale sites for development at Abergavenny, Chepstow, and Caldicot (including Severnside area). All three strategic sites have been considered through the ISA process, with summary findings presented in Chapter 6 and detailed appraisals presented in Appendix C. Of particular note in relation to the historic environment is strategic growth proposed at Caldicot East. The site is located within the Caldicot Conservation Area, containing Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. In this respect, development is likely to impact the intrinsic qualities, and setting of these heritage assets. While it is noted that suitable site design/ layout can mitigate effects to some degree, specific details in this respect are absent at this stage.
- 9.154 While less significant, also of note is strategic site allocation Bayfield, Chepstow, which is constrained by assets outside of the site boundary. Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west of the site, while the Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) is situated to the north east of the site, across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure. As above, there is the potential for development to lead to negative effects, although residual effects are uncertain in the absence of detailed mitigation.
- 9.155 More broadly, it is recognised that there are designated heritage assets within and in close proximity to the lower tier settlements where development is proposed. This along with development in the rural areas could have impacts on the historic environment; however, given the scale of growth this is unlikely to be significant. Proposed development at the smaller settlements and in the rural areas may also have impacts on the historic environment but this is uncertain at this stage as the precise location of growth is not known.
- 9.156 There are a number of other policies that support or permit a type of development that could have impacts on the historic environment but that do not specify a quantum or any sites/ locations. These include Policies S4 (Climate Change), S5 (Infrastructure Provision), S8 (Gypsy and Travellers), S11 (Community and Recreation Facilities), S12 (Employment Site Provision), S13 (Rural Enterprise), and S14 (Visitor Economy).

- 9.157 In terms of the future well-being of the Welsh language the Preferred Strategy is not likely to have any direct significant effects. This is dependent on a range of factors beyond the planning system, particularly education, demographic change, community activities, and a sound economic base to maintain thriving sustainable communities. The Preferred Strategy will deliver new homes and employment opportunities as well as associated infrastructure improvements. As most growth is directed to the principal settlement areas, effectively integrated new housing and employment development can support cultural vitality and inclusive communities. This is likely to have a long term indirect positive effect on the future of the Welsh language; however, this is unlikely to be significant.
- 9.158 The Preferred Strategy includes policies that will help to reduce the impact of proposed development on the historic environment. This includes Strategic Policy S3 (Sustainable Placemaking & High Quality Design) which requires development to *“contribute to creating high quality, attractive and sustainable places that support the health and well-being of the community”*. To achieve this development should, *“protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places”*.
- 9.159 Strategic Policy S18 (Green Infrastructure, Landscape and Nature Conservation) states that development proposals must, *“Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscape, biodiversity, public rights of ways and heritage assets”* through *“Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character”*.

## Summary appraisal of the Preferred Strategy

- 9.160 It is recognised that a significant proportion of the individual sites/ allocations are not identified at this stage. As such it is difficult to predict or draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment theme/ ISA objectives as a result of development proposed in the Preferred Strategy. However, conclusions can be made in relation to the broad direction of growth, and the three preferred strategic site allocations put forward (Policy S7).
- 9.161 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. Notably, preferred strategic site allocation Caldicot East has the potential to impact upon Caldicot Conservation Area and a Grade I Listed Building. However, a degree of uncertainty is noted at this stage, reflecting the potential for positive design, layout, and masterplanning to mitigate effects to some extent.
- 9.162 It is considered that the historic environment, including designated heritage assets, will need to be taken into account through the Council’s candidate site appraisal process and inform the allocation of sites in the Deposit Plan.
- 9.163 The Preferred Strategy includes policies that seek to protect and where possible enhance the landscape and historic environment. Taking the above into



account, there is **uncertainty**, but significant impacts are considered unlikely 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 RDLDP.

## Appraisal of cumulative effects

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

## Landscape

### Appraisal of the Preferred Strategy

- 9.168 Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County includes:
- Wye Valley AONB located to the east of Monmouthshire. The part of the Wye Valley AONB located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.

- Brecon Beacons National Park located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.

- 9.169 In line with Planning Policy Wales (2021) it is recognised that the Wye Valley AONB and Brecon Beacons National Park are “*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.*” In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the AONB aim to “*Ensure all development within the AONB and its setting conserves and enhances the AONB.*” Notably, Objective WV-D2 seeks to “*encourage and support high standards of design, materials, energy efficiency, drainage, landscaping, and Green Infrastructure in all developments*”.
- 9.170 In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development control functions in the correlating part of the County. The LDP “*represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park.*” Additionally, ‘Future Beacons’ The Management Plan for the Brecon Beacons 2022 – 2027 sets out under even cross-cutting themes, policies, and priorities for managing change in the National Park. Notably, ‘Place Planning’, helps to deliver high quality integrated sustainable development within the National Park.
- 9.171 While protection is provided at the higher level, it is nonetheless considered that development proposed through the Preferred Strategy has the potential to adversely impact upon special landscape features, character, and setting.
- 9.172 Strategic Policy S1 (Preferred Growth Strategy) states that the LDP will make provision for 5,940 homes over the plan period. However, as explained earlier in this Chapter, the residual housing requirement during the plan period is less than this once existing commitments have been taking into account.
- 9.173 The Preferred Strategy seeks to distribute growth across the County in a manner that reflects the findings of the Sustainable Settlement Appraisal. It will focus growth to the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot including the Severnside area, together with a sustainable amount of growth to the most sustainable lower tier settlements, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. As explained earlier in this Chapter, the Preferred Strategy (Strategic Policies 1-3) remains high level. Strategic development sites are identified in the main towns, but more widely specific sites/ allocations are identified at this stage.
- 9.174 Looking specifically at the strategic policies, in accordance with Policy S2 (Spatial Distribution of Development) around 1,403 homes, including strategic site allocation Abergavenny East (635 homes, of which 500 will be delivered within the plan period) will be directed to Abergavenny which is located adjacent to the National Park. 769 homes, including strategic site allocation Bayfield, Chepstow (145 homes), are directed to Chepstow which is located in close proximity to the AONB. As a result, focussing a significant proportion of development in the Primary Settlements through the Preferred Strategy, has the potential to increase pressure on landscape character, setting, and the intrinsic

qualities of the AONB and National Park. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.

- 9.175 It is recognised that primary settlement Monmouth is also located close to the AONB, however in light of the water quality issue, as set out above no new development is directed towards Monmouth or other settlements along the Upper Wye Catchment. This is anticipated to lead to positive effects against the Landscape ISA objective, limiting growth in this sensitive location.
- 9.176 Consideration is also given to the impact of the Preferred Strategy on the wider valued landscape; recognising that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 landscapes of outstanding or special historic interest in Wales. Notably there are four located within Monmouthshire. These mainly relate to the AONB along the east of the County, along the Severn Estuary to the south, and to the west coinciding with the Brecon Beacons National Park.
- 9.177 While the exact location of smaller sites is currently unknown, it is considered that directing a significant proportion of growth towards important designated landscapes will ultimately change the landscape setting of these assets to some degree, with both positive and negative effects anticipated. Negative effects are ultimately anticipated due to a loss of greenfield and agricultural land through strategic development sites at Abergavenny and Chepstow. The delivery of these sites is likely to affect local landscape character, with development at Chepstow also considered likely to affect views from the AONB given the rural nature and topography of the County. More broadly, effects are likely to be more significant in relation to Abergavenny East, given the scale of growth proposed and the categorisation of the site as being of ‘a high to medium landscape sensitivity’ in relation to residential development.<sup>39</sup> Bayfield, Chepstow is categorised as being of ‘medium landscape sensitivity’.
- 9.178 It is considered that potential negative effects and potential positive effects are dependent upon the delivery of high-quality design and efficient layout and orientation - these aspects remain uncertain until site proposals undergo further assessment, which will inform the Deposit stage, where proposals will be largely guided by policy.
- 9.179 To this effect, Policy S3 (Sustainable Placemaking & High Quality Design) requires that “*development shall contribute to creating high quality, attractive and sustainable places that support the well-being of the community.*” In order to achieve this, in line with Policy S4, all development should:
- “*Incorporate a Green Infrastructure led approach that respects local distinctiveness and the character of the site and its surroundings; and*
  - *Protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places.*”
- 9.180 PPW places the delivery of sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly at the heart of the Plan and notes it as the optimal outcome of development plans. Notably, PPW 11 defines Green Infrastructure as “*the network of natural and semi-natural*

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<sup>39</sup> Monmouthshire Landscape Capacity Update 2020

*features, green spaces, rivers and lakes that intersperse and connect places*".

The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW, recognising the multi-functional role it has in delivering the goals and objectives of the Future Generation and Wellbeing Act.

- 9.181 The Preferred Strategy supports a green infrastructure led approach to the design of new development that will enhance the character and identity of Monmouthshire's settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. It is however recognised that the achievement of this will depend largely upon identifying and understanding the local characteristics which are distinctive to an area. To ensure this is delivered, Policy S17 (Green Infrastructure, Landscape and Nature Conservation) requires that development proposals maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscapes, biodiversity, public rights of ways and assets through the following key functions:
- Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;
  - Greenspace Provision, Connectivity and Enjoyment by ensuring the creation of accessible multifunctional interconnected spaces that offer opportunities for recreation and wellbeing
- 9.182 This will contribute positively towards meeting the RLDP objective to *"protect, enhance and manage Monmouthshire's natural environment. This includes, the Wye Valley AONB, the County's other high quality and distinctive landscapes, along with the connectivity between them by creating new linkages for them to adapt while at the same time maximising benefits for the economy, tourism, health and well-being."* In this context, in accordance with Strategic Policy S5 (Infrastructure Provision) development may be required to include *"Recreation and Leisure Facilities including formal and informal open space"*, and/ or *"Green Infrastructure"* alongside development, to make development acceptable.
- 9.183 Overall, given Monmouthshire's rural nature and the landscape assets present, it is considered that the delivery of the Preferred Strategy is predicted to lead to long term negative effects as a result of the introduction of development in sensitive, previously undeveloped areas; despite the specific location of some development being currently unknown. It is however noted that Preferred Strategy policies seek to ensure that development, where possible, retains and enhances distinctive landscape features, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects of growth across the County. Residual minor negative effects are therefore predicted against the Landscape ISA theme.

## Summary appraisal of the preferred strategy

- 9.184 The Preferred Strategy proposes the delivery of new employment land and homes to meet identified need and provide flexibility throughout the plan period. Growth is being directed towards the higher tier settlements given the findings of the Sustainable Settlement Appraisal (2021), together with a sustainable amount of growth to the most sustainable lower tier settlements. 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.

- 9.185 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.
- 9.186 Overall it is considered that there is the potential for the Preferred Strategy to lead to long term **uncertain negative effects** on the landscape. This is given that it not possible to conclude effects will be significant at this stage. The precise location and scale of development at smaller sites is not currently known and will influence the significance of residual effects, alongside wider policy provisions yet to be developed.

## Appraisal of cumulative effects

- 9.187 Development proposed through the Preferred Strategy has the potential to interact with and have cumulative effects on landscape with growth proposed in other areas outside the County. This includes development plans in surrounding LAs, such as Torfaen, Newport, Brecon Beacons National Park, Forest of Dean and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance the landscape.
- 9.188 Development proposed through the Preferred Strategy has the potential to interact with development proposed through these other plans to have a cumulative effect on the landscape. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Wye Valley AONB and Brecon Beacons National Park, given their importance nationally.
- 9.189 When considering cumulative effects of development on the AONB, consideration should be given to the protections provided by the adopted Wye Valley AONB Management Plan (2021). In addition to national policy requirements, the AONB Management Plan sets out Strategic Development Objectives, which aim to *"Ensure all development within the AONB and its setting conserves and enhances the AONB"*.
- 9.190 In terms of the National Park, the Brecon Beacons National Park Local Plan was adopted in 2013 and no significant growth is proposed during the plan period or in close proximity to the Torfaen, Blaenau Gwent or Monmouthshire administrative boundary. A review of the LDP is currently being carried out and a Preferred Strategy Document was published for consultation in July 2019. However, following new evidence regarding the environmental impacts of phosphate in watercourses, and subsequent tighter targets adopted by NRW for the water quality of watercourses, the BBNP authority has halted preparation of



its RLDP.<sup>40</sup> The authority are investigating with NRW the permitting arrangements for Talgarth Wastewater Treatment Works and will recommence once obligations under the Habitats Regulations are met. As such, the scale and location of any future growth for the area is currently unknown.

- 9.191 When considering cumulative effects of development on the BBNP, consideration should be given to the protections provided by the BBNP Management Plan (2021). In addition to national policy requirements, the Management Plan sets out under numerous Themes, policies and priorities for managing change in the National Park. Notably, 'Place Planning', helps to deliver high quality integrated sustainable development within the National Park.
- 9.192 Ultimately the nature and significance of effects will be dependent on the precise location as well as design/ layout of development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural Resources Wales/ Natural England and the Wye Valley AONB Partnership, to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

## Climate change

### Appraisal of the preferred strategy

- 9.193 The Climate Change ISA objectives are to both mitigate and adapt to the effects of climate change through increasing energy efficiency and using low carbon and renewable energy sources where possible. Adapting to the effects of climate change includes the need to adapt to increased flood risk, whilst a key focus of mitigating climate change is the need to reduce CO2 emissions from the built environment.
- 9.194 The distribution of growth proposed by the Preferred Strategy has potential to perform either positively or negatively in relation to climate change adaptation as the strategy is not supported by a bottom-up understanding of specific sites. However, there is a broad understanding of the direction of growth, including three strategic sites directed to the main settlements of Abergavenny, Chepstow, and Caldicot (including Severnside). Nonetheless, this means that detailed conclusions are challenging as flood risk varies within settlements. For example, the Preferred Strategy directs a significant proportion of growth to Abergavenny but only strategic site allocation Abergavenny East has been specifically identified (for 635 homes). Abergavenny has substantial areas of Flood Zone C2, i.e., the area at greatest risk of fluvial flooding. Therefore, effects in relation to climate change adaptation will be heavily dependent on which other sites are proposed for allocation. However, it is recognised that strategic site allocation Abergavenny East is outside of the areas of C2 fluvial flood risk. Furthermore, higher tier policy is likely to ensure that areas of high flood risk are avoided through the development process. This is reiterated by MCC.
- 9.195 In terms of the other two strategic site allocations, Bayfield, Chepstow is not constrained by flood risk. There is however an isolated area in the north half of

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<sup>40</sup> Brecon Beacons National Park Authority (2022) Planning: Phosphates [online] available at: <https://www.beacons-npa.gov.uk/planning/water-quality-phosphate-in-riverine-special-areas-of-conservation-and-implications-for-planning-and-development/>

the Bayfield site at high risk of flooding from surface water. It is recognised that the site has potential to support adaptation to the potential effects of climate change by utilising sustainable drainage systems (SuDS) and providing improvements to the local green infrastructure network. Development is also likely to be directed away from these areas of high flood risk in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.

- 9.196 Caldicot East is constrained by fluvial flood risk along its western boundary. As above, it is considered that the design and layout of development alongside the use of suitable mitigation methods will minimise the potential residual effects, in line with higher level planning policy.
- 9.197 In terms of climate change mitigation, the Preferred Strategy has a mixed performance. Notably, there is the potential to reduce greenhouse gas emissions by focusing growth at the higher tier settlements with existing transport links. By directing of the majority of growth to Tier 1 settlements, including through the allocation of strategic sites, the strategy ensures that new development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Newport, Bristol and the Wider SW Region. Similarly, new employment growth in the Tier 1 settlements will be accessible by train.
- 9.198 In terms of the strategic site allocations, it is considered that larger sites will be supported by a level of transport infrastructure/ active travel improvements. This is likely to support self-containment, reducing the need to travel and in turn contributing positively towards climate change mitigation objectives. While there is uncertainty at this stage in terms of the specific infrastructure to be provided, positive effects of greatest significance are considered in relation to Caldicot East given the level of growth proposed, followed by Abergavenny East. Smaller site Bayfield, Chepstow is unlikely to lead to positive effects of significance.
- 9.199 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the Preferred Strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the Preferred Strategy is unlikely to have a positive effect in terms of climate change mitigation in relation to the majority of inter-settlement travel.
- 9.200 The trend of increased home and remote working in light of the Covid-19 pandemic is anticipated to continue over the longer term. In accordance with Welsh Government's ambition of 30% of people working from or near home, the Preferred Strategy supports new development where it meets infrastructure requirements, including broadband provision. This, amongst other requirements, will contribute positively towards reducing out-commuting and supporting the Council's climate change objectives by reducing the overall need to travel.
- 9.201 In 2018 the proportion of CO2 emissions in Monmouthshire from the built environment, i.e., from both domestic and industrial/commercial sources, was

50% which is notably low in relation to the Wales average of 74%. However, this is likely to simply reflect that the County has a higher-than-average proportion of emissions from transport sources, rather than reflecting low built environment emissions per se. While it is considered that the Preferred Strategy is delivering relatively low growth in absolute terms, strategic growth proposed at strategic site allocation Caldicot East is considered of scale to facilitate opportunities for delivering decentralised heat/power generation from renewable or low carbon sources. Further detailed assessment of the preferred strategic site allocations can be found in Appendix C.

- 9.202 More broadly it is considered unlikely that the distribution of growth through the Preferred Strategy will appreciably reduce emissions from the built environment.
- 9.203 Policy S4 (Climate Change) could lead to positive effects in relation to climate change adaptation and climate change mitigation. The policy has a strong emphasis on the need to embed low carbon concepts into development, saying that all development proposals will be required to “*reduce energy demand and promote energy efficiency*”, “*utilise sustainable construction techniques and local supplies through the adoption of circular economy techniques*” and “*providing ultra-low emission vehicle charging infrastructure to reduce emissions*”. The policy also requires all development to avoid “*areas at risk of flooding*” and to incorporate “*measures such as Sustainable Urban Drainage Systems and flood resilient design*”.
- 9.204 It is further recognised that the Council seek to include a Policy within the Deposit RLDP which require all new developments to be net zero carbon ready alongside the proposed changes to Building Regulations being implemented in 2025. The details of which will be determined in the Deposit RLDP. Collectively, in light of the above, minor positive effects are concluded in relation to the climate change ISA theme.

## Summary appraisal of the preferred strategy

- 9.205 Key Tier 1 settlements have an element of fluvial and surface water flood risk by virtue of their riverside locations. Abergavenny is located on the River Usk, while Chepstow is located on the River Wye. In this sense, focussing a significant proportion of growth at these settlements could lead to development in areas of risk; however, without specific sites it is challenging to draw detailed conclusions in this regard. Where strategic site allocations have been identified, it is recognised that flood risk is not a significant issue, with all strategic site allocations broadly directed away from high flood risk areas.
- 9.206 While the location of all other sites are unknown at this stage, it is important to draw attention to the fact that higher tier planning policy and guidance via PPW and Technical Advice Note 15 requires development to be directed away from the highest risk areas. In light of this and recognising that the strategic site allocations are not at risk of flooding, it is reasonable to conclude the Preferred Strategy will likely direct all growth towards low risk sites. This is particularly in the context of Policy S4 (Climate Change) which echoes higher-tier requirements to avoid areas of flood risk. **Neutral effects** are therefore anticipated in relation to climate change adaptation. In terms of mitigation, the Preferred Strategy broadly seeks to limit the effects of climate change by ensuring new homes are net zero carbon ready and well connected with existing settlements, providing



attractive and accessible places to live and work. Further details are to be determined in the Deposit RLDP.

- 9.207 Specifically, it is considered that the delivery of over 1,000 homes at strategic site allocation Caldicot East has the potential to utilise strategic scale opportunities for delivering innovative renewable energy generation. Additionally, while smaller in size, Abergavenny East is considered of scale to also deliver positive effects in this respect. While there is the potential for significant positive effects to be delivered in relation to climate change mitigation, effects remain **uncertain** at this stage without further detail in terms of viability and site-specific cost considerations. This is anticipated to be provided at the Deposit stage.

## Appraisal of cumulative effects

- 9.208 In terms of climate change adaptation there does not appear to be notable potential for negative cumulative effects from development in Monmouthshire in combination with development in neighbouring plan areas. Although significant areas of fluvial flood risk permeate the County, in alignment with the major watercourses which flow to the Severn estuary to the south, there is a presumption in the PPW against development in Flood Zone C2, the highest risk zone. This is augmented by the revised draft Technical Advice Note 15 (TAN15) which emphasises that *“In Zone 3 (Rivers and Sea), allocations for residential and other highly vulnerable development must not be made as the risks and consequences of flooding are not considered acceptable for these types of development.”* This will help ensure that development in Monmouthshire will be part of a regional and national picture of development which is directed away from areas at high risk. In this sense effects from the Preferred Strategy in combination with surrounding authorities are likely to neutral.
- 9.209 Additionally, the PPW presumption against such development is likely to ensure that development upstream from Monmouthshire in neighbouring authorities will be directed away from high-risk areas, thereby minimising interference in the natural flow of watercourses through the County. The Preferred Strategy is similarly unlikely to direct development to locations which could have impacts further downstream in neighbouring plan areas. For example, in the context of the PPW and TAN15 development at Usk will be unlikely to be of a scale or at sites which could impact the River Usk downstream as it flows through Newport.
- 9.210 In terms of climate change mitigation there is greater potential for cumulative effects. As noted in the discussions of air quality and of transport, positive effects are anticipated from proposed expansion of the SE Metro throughout the Cardiff Capital Region, including in Monmouthshire. This includes enhanced rail connectivity between Cardiff and Abergavenny and Chepstow, and bus rapid transit between Cardiff and Monmouth. This will likely contribute to a modal shift away from high emitting transport modes towards sustainable travel. However, regional growth along major road arteries, such as growth in Newport along the M4 corridor and growth in Blaenau Gwent along the A465 corridor, could introduce additional road users as well.
- 9.211 The Cardiff Capital Region City Deal states an ambition for the ten authorities in the Cardiff Capital Region to come together to deliver strategic solutions for the region, including in relation to renewable energy. The City Deal identifies that regional development will present opportunities to deliver *“renewable energy-led*

*regeneration and housing programmes*". In this context there is theoretical potential for positive in-combination effects, particularly as larger-scale development can give rise to opportunities to minimise per capita emissions from the built environment over-and-above a strategy involving dispersal of housing growth across smaller sites. It is recognised that development proposed through the adopted plans of the Brecon Beacons National Park, Forest of Dean, and Herefordshire could demonstrate particular locational/ site specific opportunities in respect of minimising per capita built environment and transport emissions.

- 9.212 There could also be potential to explore strategic low-carbon opportunities from development in the south of Monmouthshire in combination with the strategic Eastern Expansion Area in Newport.

## 10. Summary appraisal findings for the preferred strategy

### Introduction

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

### Summary appraisal findings

- 10.2 The ISA found that the Preferred Strategy has the potential for significant positive effects in relation to the economy and employment, population and communities and transport and movement ISA themes. It proposes a level of growth to meet the needs of communities during the plan period and distributes it according to the settlement hierarchy, the majority of growth being focussed at settlements where there is good access to sustainable transport modes and existing facilities/ services/ employment opportunities. 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.
- 10.3 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.
- 10.4 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.

- 10.5 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.
- 10.6 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.
- 10.7 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.
- 10.8 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.
- 10.9 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.
- 10.10 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.

- 10.11 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 HRAAA will be carried out at the Deposit stage.
- 10.12 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.
- 10.13 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<br>significant effect<br>predicted at this<br>stage? |
|---|---|
| <p style="text-align: center;"><b>Economy and employment</b></p> <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><b>Yes - Positive</b></p>                                  |

| Commentary | Residual<br>significant effect<br>predicted at this<br>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<br>significant effect<br>predicted at this<br>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<br>significant effect<br>predicted at this<br>stage? |
|------------|---|
|------------|---|

### 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.

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.

**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<br>significant effect<br>predicted at this<br>stage? |
|---|---|
| <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> |   |

## Natural resources

| Commentary | Residual<br>significant effect<br>predicted at this<br>stage? |
|------------|---|
|------------|---|

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<br>significant effect<br>predicted at this<br>stage? |
|---|---|
| <p>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.”</p> <p>The ISA supports the conclusions/ recommendations of the HRA AA, and it is considered that these will be adopted through the Deposit Plan.</p> <p>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.</p> <p>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.</p> <p>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.</p> |   |

### 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<br>significant effect<br>predicted at this<br>stage? |
|------------|---|
|------------|---|

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 RDLDP.

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<br>significant effect<br>predicted at this<br>stage? |
|------------|---|
|------------|---|

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.

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### 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?

## 11. Introduction (to Part 3)

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

## 12. Next steps

12.1 This Initial SA Report will accompany the Preferred Strategy for public consultation from 5<sup>th</sup> December 2022 to 30<sup>th</sup> January 2023. Any comments received will be reviewed and then considered as part of the iterative plan-making and ISA process.

12.2 The representations received along with further evidence base work, including further ISA work, will inform the development of the Deposit Plan which is scheduled to be published for consultation in 2024. An updated ISA Report will accompany the Deposit Plan for consultation.

## 13. Monitoring

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

# Appendices



## Appendix A Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans (Wales) Regulations 2004 explains the information that must be contained in the ISA Report; however, interpretation of Schedule 2 is not straightforward.

Overleaf, Table A1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table A2 explains this interpretation.

**Table A1 Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements**

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

## Schedule 2

### The report must include...

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

## Interpretation of Schedule 2

### The report must include...

|   |  |   |
|---|--|---|
| <p>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</p>  | <p>i.e. answer - <i>What's the plan seeking to achieve?</i></p>  |   |
| <p>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</p> <p>The relevant environmental protection objectives, established at international or national level</p>  | <p>i.e. answer - <i>What's the 'context'?</i></p>  | <p>i.e. answer – <i>What's the scope of the SA?</i></p> |
| <p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'</p> <p>The environmental characteristics of areas likely to be significantly affected</p> <p>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</p>   | <p>i.e. answer - <i>What's the 'baseline'?</i></p>   |   |
| <p>Key environmental problems / issues and objectives that should be a focus of appraisal</p>   | <p>i.e. answer - <i>What are the key issues &amp; objectives?</i></p>  |   |
| <p>An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')</p> <p>The likely significant effects associated with alternatives, including on issues such as...</p> <p>... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.</p> | <p>i.e. answer - <i>What has Plan-making / SA involved up to this point?</i></p> <p><b>[Part 1 of the Report]</b></p>    |   |
| <p>The likely significant effects associated with the draft plan</p> <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</p>  | <p>i.e. answer - <i>What are the assessment findings at this current stage?</i></p> <p><b>[Part 2 of the Report]</b></p> |   |
| <p>A description of the measures envisaged concerning monitoring</p>  | <p>i.e. answer - <i>What happens next?</i></p> <p><b>[Part 3 of the Report]</b></p>                                      |   |

**Figure A1 Questions answered by the SA Report, in accordance with regulatory requirements**

Whilst **Table A1** and **Figure A1** signpost broadly how/ where this report presents the information required of the ISA Report by the Regulations, as a supplement it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see **Table A2**.

**Table A2 ‘Checklist’ of how (throughout the ISA process) and where (within this report) regulatory requirements have been, are and will be met**

| Regulatory requirement  | Discussion of how requirement is met  |
|---|---|
| Schedule 2 of the regulations lists the information to be provided within the ISA Report  |   |
| 1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;   | Chapter 2 (‘What’s the Preferred Strategy seeking to achieve?’) presents this information.<br>The relationship with other plans and programmes is also available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.   |
| 2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;   | These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2022.  |
| 3. The environmental characteristics of areas likely to be significantly affected;  | The outcome of scoping was an ‘ISA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the SA’).<br>More detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are available to view separately via MCC. This is given the iterative nature of the process, and these documents will be updated as necessary.  |
| 4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;       |   |
| 5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation; | The Scoping Report (2022) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘ISA framework’.<br>The context review informed the development of the ISA framework and topics, presented in Chapter 3, which provide a methodological ‘framework’ for appraisal.<br>With regards to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> <li>Chapters 5 explains how reasonable alternatives were established in-light of earlier consultation and evidence.</li> </ul> |

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives, with the detailed appraisal provided in Appendix II.</li> <li>Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</li> <li>Chapters 9 and 10 sets out the findings of the appraisal of the Preferred Strategy.</li> </ul>  |
| 6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects); | <ul style="list-style-type: none"> <li>Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives at this stage with the detailed appraisal provided in Appendix II.</li> <li>Chapters 9 presents the draft plan appraisal, and the summary findings are provided in Chapter 10.</li> </ul> <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the ISA scope, and the need to consider the potential for various effect characteristics/ dimensions.</p> |
| 7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;  | <p>Where necessary, the appraisal of the alternatives (Appendix II and Chapter 6) and the Preferred Strategy (Chapters 9 and 10) identify avoidance and/ or mitigation measures to reduce the significance of residual negative effects or to enhance residual positive effects. These will be explored further through the ISA of candidate sites and the Deposit Plan.</p>   |
| 8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;   | <p>Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.</p>   |

|  |  |
|--|--|
| 9. Description of measures envisaged concerning monitoring in accordance with Art. 10; | As explained in Chapter 13, monitoring measures will be set out in the ISA Report that accompanies the Deposit Plan. |
| 10. A non-technical summary of the information provided under the above headings       | The NTS is provided in a separate document.  |

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

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

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

### **The ISA Report must be considered, alongside consultation responses, when finalising the plan.**

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

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

# Appendix B Appraisal of Strategic Options

## Introduction

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

## Method

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

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

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

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

## Appraisal of options for the level of growth

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

Later in 2020 the Council revisited the Growth and Spatial Options stage of the RLDP process due to the publication of updated key evidence. 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. Of fourteen different scenarios generated for Monmouthshire, six growth options were selected for further testing through the ISA.

The six growth options identified were included for consultation in the December 2020 Growth and Spatial Options Paper. These options were subject to ISA in 2020, and presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.

Following consultation on the Preferred Strategy, a number of challenges have arisen (see Chapter 5), resulting in the need to develop new options for the level of growth. The three growth options now considered for ISA are presented in Table B.1 overleaf.



**Table B.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 |
|---|------------------|-----------------------------|---------------------|---------------------------------|----------------------------|--------------------|---------------------|---------------------|----------------|----------------|
| <b>Existing Preferred Strategy growth</b><br><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          |
| <b>Demographic led strategy for the LPA area</b><br><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          |
| <b>WG prescribed growth</b><br><i>Dwelling-led (WG prescribed 285 dpa)</i>  | Dwelling         | 8,050                       | +9.3%               | 830                             | 3,900                      | +10.6%             | 285                 | 4,280               | 286            | 4,290          |

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

## ISA Theme: Economy and Employment

| Options             | Option 1 – Existing Preferred Strategy growth   | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
|---------------------|---|--|---------------------------------|
| Rank                | 1   | 2  | 3                               |
| Significant effect? | Yes - positive  | Yes - positive                                       | No                              |
| <b>Discussion</b>   | <p>Option 1 seeks to deliver a higher economic growth level than Options 2 and 3 and as a result, is expected to be best performing in relation to this ISA theme. The housing growth proposed alongside economic development also seeks to address potential demographic imbalances with growth in key working age groups. Option 1 is likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Option 1 is also predicted to provide opportunities to encourage a more diverse and vibrant economy; notably providing opportunities associated with the Cardiff Capital Region City Deal, the SE Wales Metro, and the removal of the Severn Bridge toll. Considering these benefits to local economy and employment, significant long-term positive effects are anticipated under Option 1.</p> <p>Option 2 would result in a growth in jobs of 416 pa, which would encourage greater indigenous business growth and encourage inward investment. This would contribute positively towards creating a thriving, well-connected, diverse economy and would assist in building sustainable and resilient communities.</p> <p>Option 3 represents jobs growth at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce (although there is some growth in the 30-44 age groups), as well as a declining customer base, under this option. The employment growth proposed eventually brings job levels in the County broadly in line with the average job level seen over the last 15 years, but not until the end of the Plan period. As a result, negative effects are considered likely, with Option 3 therefore worst performing in this respect.</p> <p>To summarise, there is an assumption that the higher the level of economic and housing growth, the greater the potential significance of positive effects. Option 1 therefore is considered likely to lead to positive effects of greatest significance, supporting a well-connected diverse economy, and is ranked highest. Significant positive effects are also predicted in relation to growth Option 2 as while the level of economic and housing growth is lower than Option 1, there remains net positive job</p> |  |                                 |

ISA Theme: Economy and Employment

creation and dwellings per annum. However, effects are likely to be negative under Option 3 given the overall decline in working age population in the county, and the option is ranked least favourably.

## ISA Theme: Population and communities

| Options             | Option 1 – Existing preferred strategy growth   | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
|---------------------|---|--|---------------------------------|
| Rank                | 1   | 2  | 3                               |
| Significant effect? | Yes - positive  | Yes - positive                                       | No                              |
| <b>Discussion</b>   | <p>The latest (2020-2021) Monmouthshire Annual Monitoring Report of the Adopted LDP shows that both the annual level of housing completions monitored against the Average Annual Requirement (AAR) and the total cumulative completions monitored against the cumulative requirement (Cumulative AAR) are under delivering, although in more recent AMRs the % of under delivery has steadily declined as strategic sites have come forward. As such, it is considered that options 1 and 2 would perform positively in terms of contributing towards meeting and sustaining sufficient land supply for the forthcoming Plan period, supporting the future vitality of communities. Option 3 however would deliver limited residential allocations, performing least positively in this respect.</p> <p>Options 1 to 3 deliver gradually decreasing levels of growth, and it is assumed that as the level of growth increases, so does the ability to address historic under-delivery, and deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm. Option 1 therefore performs most positively in this respect, followed by Option 2.</p> <p>The delivery of community benefits will be particularly important in addressing potential future demographic imbalances, and modelling suggests that natural balances are more likely to be achieved with the growth levels proposed under Option 1. Under this higher growth option, growth in younger age brackets, particularly those of working age, balance out the effects of an ageing population, and new development provides the opportunity to address the changing needs of residents in this respect.</p> <p>While high growth proposed through Option 1 presents the potential to deliver a greater level of infrastructure improvements, the option, given the scale of growth in the context of the County, may also place increased demands on existing infrastructure. Notably, in terms of education, Option 1 would likely result in a significant growth in the number of school aged children,</p> |  |                                 |

**ISA Theme: Population and communities**

placing more pressure on the capacity of existing schools. However, the level of housing delivery would provide a substantial opportunity to secure additional provision through planning gain to fund extensions and/ or new schools. Conversely, lower growth proposed through Option 3 would likely lead to an unbalanced demographic, and likely see falling school numbers which could in turn result in the closure of schools. Finally, in terms of Option 2, it is recognised that while the level of growth from younger age groups is at a low level, a more balanced demography has the potential to secure a level of new infrastructure and support balanced communities.

Taking the above into account it is considered that as the level of growth increases so does the likelihood for positive effects of significance. Option 1 would provide a greater range of new homes to meet the predicted increased population and affordable housing needs and is therefore more likely to have a residual significant effect when considered against Options 2 and 3. Option 1 is ranked most favourably accordingly, however, it is noted with Option 1 that there is a need to manage the impacts of growth on local infrastructure capacity so that it does not place unnecessary burdens on existing infrastructure. Option 2 also has the potential to reduce burdens in this respect, but notably will deliver less growth than Option 1 leading to positive effects of less significance. Option 3 is the worst performing as would lead to an unbalanced demographic with limited opportunities to build sustainable communities and support the County’s younger population. Any effects are therefore likely to be minor in nature.

## ISA Theme: Health and Wellbeing

| Options             | Option 1 – Existing preferred strategy growth  | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
|---------------------|--|--|---------------------------------|
| Rank                | 1  | 2  | 3                               |
| Significant effect? | Yes - positive   | Yes - positive                                       | No                              |
| <b>Discussion</b>   | <p>At the time of the 2011 Census 46.4% of Monmouthshire residents felt that they were in ‘very good health’ (Wales 46.6%), whilst 4.6% felt that they were in ‘bad health’ (Wales 5.8%). This reflects the 2021/2022 data on lifestyle and behavioural choices for adults in Wales, which shows that Monmouthshire has a lower proportion of smokers, e-cigarette users, and those who are overweight and/ or obese.<sup>41</sup> However, Monmouthshire has a higher percentage (23%) of those who consume more than 14 units of alcohol on a weekly basis, which was higher by 7% than in the Aneurin Bevan Health Board area and Wales.<sup>42</sup> The 2019 WIMD health domain further highlights deprivation relating to the lack of good health. In Monmouthshire, there are 20 LSOAs in the 50% most deprived, 5 LSOAs in the 30% most deprived, and 2 LSOAs in the 20% most deprived.</p> <p>In terms of access to the countryside, green/ open spaces, it could be suggested that as the level of growth increases so does the potential for accessibility to be reduced in this respect; for example where countryside is lost at settlement edges. However, this is dependent on the exact location of development and therefore effects are uncertain under all options at this stage. Furthermore, the higher level of growth under Option 1 could increase pressure on existing health services; and it is recognised that Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny. Despite this, there are certain health benefits associated with growth and development. This includes the potential for new or improved community services and facilities supporting growth in the County, including healthcare, public spaces, green infrastructure and retail and leisure. Further, development which delivers transport and infrastructure upgrades, including active travel upgrades, can improve accessibility and safety for residents. The importance of improved connectivity and accessibility to local facilities and open space, in light of the recent pandemic, highlights the potential for higher growth under Option 1, and to a lesser extent Option 2, to support more positive health outcomes than Option 3. However, there is also a need to manage the impacts of growth on local infrastructure capacity to ensure that no unnecessary burdens are placed on existing infrastructure. Option 1 followed by</p> |  |                                 |

<sup>41</sup> StatsWales (2022) Adult lifestyles by local authority and health board [online] available at: <https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021>

<sup>42</sup> Ibid

## ISA Theme: Health and Wellbeing

Option 2 will likely ensure communities are balanced, healthy, and socially sustainable, with the potential for significant long term positive effects.

Lower growth proposed through Option 3 could negatively impact on communities and exacerbate negative health implications by providing limited opportunities for job creation or improvements to existing services and facilities. The unbalanced demographic and low level of dwelling and job creation provides little opportunity to support social sustainability and balanced communities. While negative effects are unlikely to be significant under Option 3, Option 3 nonetheless performs least favourably of all options.

## ISA Theme: Equalities, Diversity, and Social Inclusion

| Options             | Option 1 – Existing preferred strategy growth  | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
|---------------------|--|--|---------------------------------|
| Rank                | 1  | 2  | 3                               |
| Significant effect? | Yes - positive   | Yes - positive                                       | No                              |
| <b>Discussion</b>   | <p>At this stage the location of growth is not known, as a result it is difficult to determine how specific communities and protected characteristics are likely to be affected by the Options. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County; however, again this would be dependent on the preferred spatial strategy.</p> <p>Whilst lower growth could be argued to help protect the identity of existing communities, Option 3 has the potential to impact negatively on the age profile of the County leading to an unbalanced demographic, with the continuation of an ageing population over the Plan period. Under Option 3 there will be limited opportunities for the younger population to live and work in the County, through providing limited opportunities for job creation or improvements to existing services and facilities. This is likely to exacerbate inequality, in particular, the effects of rural isolation which will negatively impact groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues. Difficulties in sustaining services/facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would further increase deprivation issues, the significance of which has been particularly highlighted through the recent pandemic. As a result, Option 3 is predicted to lead to negative effects, though these effects are unlikely to be significant, the option is judged to perform least favourably of all options.</p> <p>Higher growth under Option 1 would likely result in a more balanced demographic with an increase in the number of older and elderly people living in the County balanced against an increase in the younger age groups. Option 2 would also provide a more balanced demographic however it should be recognised there is some decline in the 20-29 age group. New development through Option 2 could provide opportunities to support the rural economy and address rural isolation and social inequality, but</p> |  |                                 |



**ISA Theme: Equalities, Diversity, and Social Inclusion**

positive effects are likely to be greater in this respect through Option 1. Both Options 1 and 2 present opportunities to improve accessibility and reduce inequalities through an appropriate spatial strategy, delivering sustainable local communities.

Taking the above into account, both Options 1 and 2 have the potential to lead to significant positive effects through the delivery of new homes, jobs and community infrastructure that strategically improves accessibility and connectivity within the County. It is however recognised that Option 1 could enhance the significance of these effects through planning for more homes, and therefore Option 1 ranks highest overall.

| ISA Theme: Transport and Movement |   |  |                                 |
|-----------------------------------|---|--|---------------------------------|
| Options                           | Option 1 – Existing preferred strategy growth   | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
| Rank                              | 1   | 2  | 3                               |
| Signifi-<br>cant<br>effect?       | No  | No   | No                              |
| <b>Discu-<br/>ssion</b>           | <p>At this stage, there is no evidence to suggest that the levels of growth proposed under any of the options would have a significant negative effect on the highway network. Whilst all options propose a level of growth that could lead to negative effects in terms of congestion, negative effects are not considered likely to be significant. Further, in light of the recent pandemic, it is likely that higher levels of homeworking will also prevail as a longer-term trend. Higher growth Option 1, followed by Option 2, further provide greater critical mass to enable more significant infrastructure improvements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition, such as expansion of the EV network, smart technologies, last mile deliveries and active travel networks including cycle route connectivity. Conversely, lack of employment opportunities and low housing growth levels under Option 3 would likely result in limited opportunities to enhance transport infrastructure, accessibility, active travel, and the use of sustainable transport options.</p> <p>The nature and significance of the effects will ultimately be dependent on where the development is located as well as the infrastructure improvements that could be provided. If the additional residential development is located close to the main settlements, taking advantage of the services/ facilities and employment opportunities on offer, and main bus routes, then there is the potential to reduce levels of out-commuting, encourage the use of sustainable transport and therefore encourage a modal shift. Similarly, if growth were to be focussed to the south of the County/ Severnside along the M4 corridor, this would utilise good links to the M4 and other sustainable travel links including rail at Caldicot and Severn Tunnel Junction Train Stations. Growth to the south would also capitalise upon transport improvements such as the removal of the Severn Bridge toll and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the SE Wales Metro. If additional growth is located away from the main settlements and Severnside, in the rural areas, then this is likely to exacerbate the current trend of private vehicle use and increase traffic on the road network in the absence of significant interventions; given sustainable transport infrastructure is limited in these locations.</p> |  |                                 |

## ISA Theme: Transport and Movement

Considering the above, whilst no significant effects are predicted, much uncertainty remains about the overall performance of the options in relation to this ISA theme until the spatial strategy is more clearly defined. However, it is duly recognised that Options 1 and 2 have greater potential for positive transport outcomes than the limited opportunities provided through Option 3, and the ranking of Options reflects this assumption.

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

| Options             | Option 1 – Existing preferred strategy growth  | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
|---------------------|--|--|---------------------------------|
| Rank                | 3  | 2  | 1                               |
| Significant effect? | Uncertain  | Uncertain  | Uncertain                       |
| Discussion          | <p>As the level of growth increases so does the likelihood for negative impacts on natural resources through the potential loss of greenfield/ agricultural land and mineral resources; reduced air quality as a result of increased traffic; and increased demand for water resources.</p> <p>Most of the County's main settlements are surrounded by BMV (Grade 3a and above). Alongside soil resources, South Wales is well-endowed with aggregate resources and it has inherited over time a substantial volume of permitted reserves, although the reserves are often variable in terms of quality and location. There is one limestone quarry within Monmouthshire, the Ifton Quarry which whilst not currently worked could be worked in the future. Additional limestone resources exist in the southern part of the County, but in general, the area is sensitive in terms of environmental capacity. Furthermore, some parts of the limestone resource lie within the Wye Valley AONB; MTAN1 (paragraph 49) indicates that no allocations should be made in respect of such areas. There are no significant sources of secondary aggregates in the area. Under the adopted Monmouthshire Local Development Plan Policy M2 (Minerals Safeguarding Areas), safeguarding zones are identified for sand and gravel and limestone resources within the County. A substantial part of the south of the County is affected by the limestone safeguarding area. The sand and gravel deposits are predominantly located in the Usk Valley.</p> <p>It is considered that mineral landbank obligations could be met under all Options, though it is recognised that increasing levels of growth will put increasing pressure on safeguarded areas, particularly those that encroach upon settlements. The overall loss of agricultural land and mineral resources is uncertain at this stage as it will be dependent on the precise location of development and if the land is greenfield or brownfield. The quality of agricultural land will also play a role in determining the potential significance of effects.</p> <p>While it is recognised that the provision of housing alongside employment could promote efficient use of land and use of brownfield sites, it is also recognised that brownfield land is sparse throughout the County, and most development is</p> |  |                                 |

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

anticipated to take place on greenfield land. In this respect, Option 3, that proposes a low level of growth, is considered to perform better against this theme as will require less land take. This is reflected in the ranking of Options, with Option 1 performing least positively given it proposes the highest level of growth.

Whilst air pollution is not a significant problem in Monmouthshire, air quality across the County varies with two Air Quality Management Areas (AQMAs) declared in Usk and Chepstow. It is therefore considered that the significance of effects in this respect will be dependent on the location of growth, and the implementation of appropriate mitigation measures. As discussed under the transportation ISA theme, with an increase in population it is considered that higher growth Options 1 and 2 have greater potential for negative effects than Option 3 in relation to congestion on the existing road network. However, no evidence suggests this will lead to effects of significance. Ultimately the spatial strategy should seek to reduce congestion pressures at AQMAs, and new development provides opportunities to address infrastructure upgrade requirements that support more efficient movement in the highways network and active travel. New development also provides opportunities to increase local accessibility, particularly access to employment opportunities, which can in turn support reduced levels of out-commuting and congestion and support a modal shift. A higher level of homeworking brought on by the recent pandemic is also considered likely to continue to some degree as a longer-term trend supporting reduced congestion and improved air quality. Considering this, whilst no significant effects are considered likely at this stage, the overall nature and significance of the effects in relation to air quality under all options remains uncertain until the precise location of development is known.

In terms of water quality, a key issue for development is river phosphate levels, reflecting new evidence detailing the damaging effects of phosphates to water ecosystems and species. At present, over 60% of waterbodies in Wales fail against NRW's new (2021) targets, and Welsh local planning authorities are being asked to take more action to avoid further deterioration of the environment. As discussed further under the 'Biodiversity' ISA theme within the spatial strategy options assessment below, development within SAC river catchments - in particular those that will generate increased volume or concentration of wastewater - are now required to demonstrate that the design will not contribute to increased phosphate levels.<sup>43</sup> Residual effects in this respect are currently uncertain under all options until the precise location of development is known.

Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth WRZ and the South East Wales Conjunctive Use System (SEWCUS) WRZ. The Monmouth WRZ

<sup>43</sup> Natural Resource Wales (2021) Tighter phosphate targets change our view of the state of Welsh rivers <https://naturalresources.wales/about-us/news-and-events/news/tighter-phosphate-targets-change-our-view-of-the-state-of-welsh-rivers/?lang=en>

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

supplies the market town of Monmouth and the surrounding villages. This WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.<sup>44</sup>

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

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

Option 1 proposes a high level of growth, and therefore could place increased pressure on sewerage infrastructure; with the potential for long term negative effects. The increased growth could have impacts on water quality through increased impermeable surfaces and transfer of pollutants, but it is considered that there is suitable mitigation available at a development

<sup>44</sup> Welsh Water (2019) Final Water Resources Management Plan 2019 <https://www.dwrcymru.com/en/My-Water/Water-Resources/Final-Water-Resources-Management-Plan-2019.aspx>

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

management level to ensure that residual effects are not significant. Taking the above into account, it is considered that there are no significant differences between the options at this stage in terms of the water environment.

| ISA Theme: Biodiversity and Geodiversity |   |  |                                 |
|--|---|--|---------------------------------|
| Options                                  | Option 1 – Existing preferred strategy growth   | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
| Rank                                     | 3   | 2  | 1                               |
| Signifi-<br>cant<br>effect?              | Uncertain   | Uncertain  | Uncertain                       |
| <b>Discu-<br/>ssion</b>                  | <p>In terms of biodiversity and geodiversity the impacts will ultimately be dependent on the precise location of development. There are five European sites (Special Areas of Conservation (SAC), Special Protections Areas (SPA) or Ramsar sites) within the County; Severn Estuary SAC/ SPA/ Ramsar Site, River Wye SAC, River Usk SAC, Wye Valley Woodlands SAC, and the Wye Valley and Forest of Dean Bat sites SAC. Additionally, there are a further four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, Avon Gorge Woodlands SAC and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and could possibly be affected by growth proposed through the RLDP.</p> <p>In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs), located within the County, east of Monmouth. In terms of locally important biodiversity, there is one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. There are also approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs)) designated within the County.</p> <p>It is assumed that none of the Options would result in the loss of any international, national, or locally designated sites or lead to negative effects of significance in this respect. However, the decreasing level of growth under Options 1 to 3 is likely to require decreasingly less land take. As land take increases, there is likely to be wider habitat loss and fragmentation as well as increased pressure; notably disturbance (through recreation, noise, and light pollution), atmospheric pollution, and through impacts on water quality and resources. A key issue for development in this respect the potential impact on phosphorus levels in Welsh river SACs, i.e., the River Wye and River Usk in Monmouthshire. This is discussed further under the spatial strategy</p> |  |                                 |



## ISA Theme: Biodiversity and Geodiversity

options assessment, recognising that any effects, and their significance, will be dependent on the exact location of growth. Furthermore it is recognised that a HRA is currently being revised for the RDLP, which will determine the impact on the designated sites and their features. For the purposes of ranking the options, it is considered at this stage that Option 1, by proposing the highest level of growth has the greater potential for negative effects of significance in relation to designated sites. This is followed by Option 2, with the lowest growth Option 3 performing most positively in this respect. The ranking of Options reflects this assumption.

Despite this, it is recognised that higher levels of growth could also offer greater opportunities for delivering biodiversity net gain, creating new linkages through improvements to green infrastructure, securing and/ or enhancing ecological connectivity, public open space, and recreation provision through planning gain. However, this is uncertain at this stage as the location of development is not known. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors.

Overall, it is considered that effects are uncertain for all options, in the absence of known development locations. In terms of ranking the options, there is an assumption that as the level of growth increases through Options 2 and 1, so too does the potential significance of negative effects. Option 3 (lowest growth) is therefore ranked as the best performing option, and Option 1 (highest growth) worst; although it is recognised that an appropriate spatial strategy under any option could avoid significant negative effects arising.

| ISA Theme: Historic Environment |  |  |                                 |
|---------------------------------|--|--|---------------------------------|
| Options                         | Option 1 – Existing preferred strategy growth  | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
| Rank                            | 3  | 2  | 1                               |
| Signifi-<br>cant<br>effect?     | Uncertain  | Uncertain  | Uncertain                       |
| <b>Discu-<br/>ssion</b>         | <p>In terms of the historic environment the impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has 31 Conservation Areas that are dispersed throughout the County. There are also 45 Historic Parks and Gardens varying considerably in size and character, three Landscapes of Outstanding Historic Interest, including Blaenavon Industrial World Heritage Site, and 164 Scheduled Monuments within Monmouthshire. There are also 2,149 listed buildings spread across the County.</p> <p>While it is assumed that none of the Options would result in the loss of any designated heritage assets, all options have the potential to lead to significant negative effects, dependant entirely on the location of growth. In terms of ranking the options there is an assumption that the highest level of growth (Option 1) has the potential to result in greater levels of settlement expansion, loss of countryside at the settlement edge, affect views into and from settlements, which is particularly important for areas with designated conservation areas. Conversely effects in this respect could be lesser under low growth (Option 3). This is uncertain at this stage as the location of development is not known, but the ranking of options reflects these assumptions.</p> <p>It is also highlighted that options delivering the highest levels of growth could also offer more opportunities to improve access to designated heritage assets or help to redevelop brownfield areas that are currently detracting from the historic environment. However, again this is uncertain at this stage. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development and the implementation of mitigation measures.</p> <p>At this stage it is not possible to confirm any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options are likely to have a significant effect on the Welsh language.</p> |  |                                 |

| ISA Theme: Landscape        |   |  |                                 |
|-----------------------------|---|--|---------------------------------|
| Options                     | Option 1 – Existing preferred strategy growth   | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
| Rank                        | 3   | 2  | 1                               |
| Signifi-<br>cant<br>effect? | Uncertain   | Uncertain  | Uncertain                       |
| <b>Discu-<br/>ssion</b>     | <p>As for a number of other ISA themes, the nature and significance of effects on landscape/ townscape impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has a rich and diverse landscape, incorporating part of the Wye Valley AONB to the east of Monmouthshire and part of the Brecon Beacons National Park to the north west. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers some 14,880 hectares, which accounts for approximately 17% of the County. The part of the Wye Valley AONB located within Monmouthshire covers approximately 11,710 hectares and accounts for approximately 16% of Monmouthshire. There are also three landscapes of outstanding historic interest within Monmouthshire; including the Blaenavon Industrial World Heritage Site, the Gwent Levels and the Lower Wye Valley. A small portion of the Blaenavon World Heritage Site (approximately 20 hectares) lies within the Monmouthshire local planning area.</p> |  |                                 |
|                             | <p>The decreasing levels of additional growth proposed under Options 1 to 3 are likely to require decreasing levels of land take. As such, highest land take under Option 1 is likely to place the greatest pressure on greenfield land resources, resulting in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. While effects are broadly uncertain at this stage as the location of development is not known, the ranking of options reflects these assumptions.</p>   |  |                                 |
|                             | <p>It is noted that the delivery of any additional growth in the more rural areas is also more likely to result in a residual negative effect of greater significance, but again, this is dependent on the sensitivity of the landscape and scale and design/ layout of development.</p>  |  |                                 |
|                             | <p>Alongside the potential for negative effects, it is recognised that there is there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages through improvements to green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain.</p>  |  |                                 |

| ISA Theme: Landscape |   |
|----------------------|---|
|                      | <p>Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. As above, the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.</p> <p>Considering the above, the overall effects remain uncertain for most Options. Despite this, the increased pressures on greenfield land and rural landscapes under higher growth Options 1 and 2 are reflected in the ranking of the Options.</p> |

| ISA Theme: Climate Change (including flood risk) |  |  |                                 |
|--|--|--|---------------------------------|
| Options  | Option 1 – Existing preferred strategy growth  | Option 2 - Demographic-led strategy for the LPA area | Option 3 – WG prescribed growth |
| Rank   | 1  | 2  | 3                               |
| Signifi-<br>cant<br>effect?                      | No   | No   | No                              |
| Discu-<br>ssion                                  | <p>In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. At this stage, no specific opportunities, that would help to significantly reduce per capita GHG emissions or deliver new low carbon or renewable energy infrastructure, are known. It is also assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.</p> <p>However, higher growth options are noted for their greater potential to support infrastructure upgrades that reduce congestion and improve accessibility (particularly in terms of sustainable transport and active travel), and support a transition to lower-emission, and carbon neutral economies and networks. Further, the higher growth options are also considered for their greater potential to contribute to improved ecological connectivity, green infrastructure networks, open spaces, and urban greening measures which support improved climate resilience. As a result, higher growth options are considered for greater potential positive outcomes, and this is reflected in the ranking of options, with Option 1 performing most favourably overall.</p> <p>In terms of climate change adaptation, it is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and Sustainable Drainage (SUDs) legislation.</p> |  |                                 |

## Summary findings and conclusions for growth options

| ISA theme   | Rank/<br>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        |

For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors, and the potential mitigation measures available. 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.

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.

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.

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.

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.



## Appraisal of spatial strategy options

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

As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 following the publication of important new evidence. Options were removed and others added in light of this evidence. A total of four broad Spatial Distribution Options remained relevant at the time and were subject to ISA. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.

Following consultation on the Preferred Strategy, a number of challenges have arisen (see Chapter 5), resulting in the need to develop a new option for the distribution of growth. The two spatial options now considered for ISA are presented in Table B.2 overleaf.

**Table B.2 2022 spatial strategy options**

| Spatial Option   | Description   |
|--|---|
| <b>Distribute growth proportionately across the County's most sustainable settlements</b>  | Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, 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.   |
| <b>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</b> | 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. |

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

## ISA Theme: Economy and Employment

| Options             | Option 1 - 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 |
|---------------------|---|--|
| Rank                | 1   | 2  |
| Significant effect? | Yes - Positive  | Uncertain  |
| Discussion          | <p>Monmouthshire's increasing ageing population and shrinking working age population is currently limiting employment growth throughout the County. This is exacerbated by limited job opportunities and limited public transport, particularly in rural areas, making it harder to access jobs, services, and facilities.</p> <p>Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth, Raglan and Usk, all provide a range of employment opportunities, which is evidenced by their higher levels of self-containment.<sup>45</sup> The level of self-containment is a useful indicator of the number of people who live and work within the same settlement; providing significant potential for sustainable travel. More opportunities to maximise the self-containment of these settlements are likely to be taken through Option 1 by focussing housing and employment growth towards these settlements. This will strengthen the local economy by ensuring an appropriate economic base to enable younger people to live and work locally within the County, with the potential for significant long term positive effects. Option 2 focusses housing and employment growth towards all settlements listed above with the exception of Monmouth and other settlements in the Upper Wye catchment area. Positive effects are therefore also predicted under Option 2, however restricting growth in the primary settlement of Monmouth will likely limit economic growth in this key centre.</p> <p>Option 2 seeks to direct a greater level of growth to the south of the County than Option 1, which will lead to positive effects through responding to the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Higher growth in this part of the County will capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County</p> |  |

<sup>45</sup> Monmouthshire County Council (2021) Sustainable Settlement Appraisal [online] available at: <https://www.monmouthshire.gov.uk/app/uploads/2021/07/Sustainable-Settlement-Appraisal-June-2021.pdf>

## ISA Theme: Economy and Employment

and its location between the 'Great Western Cities'. Directing growth close to the M4/ M48 will therefore provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County. In this context, it is recognised that the main concentrations of employment outside of the Primary Settlements are in the Severnside area, with the Primary Settlements and Severnside accounting between them for nearly 72% of all employment.<sup>46</sup> Directing increased growth to the South of the County therefore has the potential to deliver long term positive effects against this ISA theme. It is however recognised that positive effects in this respect will also be delivered through Option 1 to a lesser extent, as growth is distributed proportionately across the County's most sustainable settlements.

Option 2 also seeks to direct a greater level of growth to Abergavenny in the north west of the County, and will capitalise upon strategic links to the Heads of the Valleys and the wider Cardiff Capital Region via the A465. Abergavenny also provides rail links to Newport, Cardiff, and the North, which contributes towards sustainable communities. As above, it is recognised that positive effects in this respect will also be delivered through Option 1 to a lesser extent, as growth is distributed proportionately across the County's most sustainable settlements.

Option 1 will lead to positive effects through focussing a level of growth in Monmouth in the north east of the County, capitalising upon its strategic links towards Herefordshire via the A449 and A40. Option 2 does not direct growth to this part of the County. 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.

Another key issue for the County is the changing role of high streets. Changing shopping habits, the use of out of town retail centres and increased levels of internet shopping has resulted in increased vacancy rates in some of the County's main retail centres such as Monmouth; impacting on local economic growth. The recent pandemic has also highlighted the importance of high streets and the need to protect the role and function of the high street in the local community. Current planning policy guidance on town centres (PPW11, 2021) reiterates the important role that retail and commercial centres play in creating sustainable locations, seeking to ensure they have a positive future. It identifies numerous key issues in relation to placemaking, notably including "...diversifying retail and commercial centres so they can adapt to future retail trends, so that they can continue to meet the needs of their local communities". Both options will lead to positive effects in this respect, through supporting the existing centres; protecting their vitality and viability through increasing footfall, and supporting existing/ attracting additional facilities, in the main county towns. Investing in the County's sustainable settlements and key centres will

<sup>46</sup> Business Register and Employment Survey 2017

## ISA Theme: Economy and Employment

likely retain retail expenditure and attract inward investment, adapting positively to the changing role of the high streets throughout Monmouthshire.<sup>47</sup> However, positive effects are lessened in relation to Option 2, given no new growth is directed to Monmouth, nor other settlements in the Upper Wye catchment area. Restricting employment and housing growth will likely further the trend of increasing vacancy rates in Monmouth, leading to negative effects against this ISA theme.

It is noted that tourism plays a significant role in the Monmouthshire economy, particularly in assisting in rural diversification. The County's historic town centres also attract tourists. Both options could have a positive effect on tourism with Option 1 performing more strongly as growth is also directed to Monmouth which is rich in history.

Overall, Option 1 is likely to lead to positive effects of greatest significance; facilitating sustainable growth in accordance with the full settlement hierarchy, addressing localised economic issues and supporting a well-connected diverse economy. Option 2 is also anticipated to lead to positive effects through encouraging economic growth across the County, and investing in the majority of Monmouthshire's most sustainable settlements. However, no new site allocations in the primary settlement of Monmouth and other areas of the Upper Wye catchment may lead to increased out-commuting, high street vacancies, and demographic challenges in the north east of the County. As such, uncertainty is concluded overall for Option 2 with regards to residual effects.

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<sup>47</sup> Monmouthshire Retail Background Paper, 2022

## ISA Theme: Population and Communities

| Options             | 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 |
|---------------------|--|--|
| Rank                | 1  | 2  |
| Significant effect? | Yes - Positive   | Uncertain  |
| Discussion          | <p>As a result of in-migration the population of Monmouthshire has shown a steady increase over a ten-year period to 2021. The population size has increased by 1.8%, from around 91,300 in 2011 to 93,000 in 2021, which is higher than the overall increase for Wales (1.4%), where the population grew by 44,000 to 3,107,500.<sup>48</sup></p> <p>Both options perform positively in terms of providing housing to meet the identified needs of the County, delivering affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population. However, through Option 2, growth is excluded from settlements in the Upper Wye catchment area, resulting in needs not being met across all housing market areas. Additionally, there is a need to consider the potential impact on house prices arising in this context, given the delivery of affordable homes will be focussed across Abergavenny, Chepstow and Severnside, and not meet needs more widely.</p> <p>In terms of addressing the wider needs of communities, both options will deliver long term positive effects through focussing growth at the Primary Settlements and Severnside. It is considered that facilitating the provision of increased accessible services in the urban areas, supported by connective infrastructure, will meet local needs, recognising the role of these settlements as service hubs for their rural hinterlands. This will contribute positively towards encouraging younger people to reside in the County and addressing issues surrounding accessibility for elderly residents. However, while Option 2 does focus growth at the County's sustainable settlements, this excludes Monmouth and other settlements in the Upper Wye</p> |  |

<sup>48</sup> ONS (2022) How the population changed in Monmouthshire: Census 2021 [online] available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/W06000021/>

## ISA Theme: Population and Communities

catchment area, and therefore Option 2 performs less positively than Option 1 in this respect. Restricting growth in the primary settlement of Monmouth will likely lead to increased accessibility and demography issues in this key centre.

A level of housing will also be provided under both options in the Severnside area and some of the Rural Settlements. The level of growth focused at these locations is likely to be greater under Option 2 given growth is not directed to the primary settlement of Monmouth nor the wider Upper Wye catchment area. The Secondary Settlements offer services of a more local nature aimed at meeting the daily needs of their inhabitants and those living in the surrounding areas, while outside of these settlements are a large number of smaller settlements with a limited offer in terms of services and facilities. Delivering higher growth at these locations through Option 2 could place additional pressure on existing social infrastructure at these locations; notably health care facilities unless supported by new or enhanced infrastructure capacity. Similar effects could be seen under Option 1, albeit to a lesser extent.

Option 2 is also considered to direct a greater level of growth to the south of the County than Option 1, capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County. It is however recognised that positive effects in this respect will also be delivered through Option 1 to a lesser extent, as growth is distributed proportionately across the County's most sustainable settlements.

Option 2 also seeks to direct a greater level of growth to Abergavenny in the north west of the County and will capitalise upon strategic links to the Heads of the Valleys and the wider Cardiff Capital Region via the A465. Abergavenny also provides rail links to Newport, Cardiff, and the North, which contributes towards sustainable communities. As above, it is recognised that positive effects in this respect will also be delivered through Option 1 to a lesser extent, as growth is distributed proportionately across the County's most sustainable settlements.

Option 1 will lead to positive effects through focussing a level of growth in Monmouth in the north east of the County, capitalising upon its strategic links to the wider Cardiff Capital Region towards Herefordshire via the A449 and A40. Option 2 does not direct growth to this part of the County. It is considered that limited investment in the Upper Wye Catchment area will exacerbate existing reliance on the car and high levels of out-commuting, and may exacerbate any existing demographic issues in Monmouth, which could lead to disconnected communities and isolation. Rural areas in particular will be

ISA Theme: Population and Communities

disadvantaged as they would not benefit from additional housing, infrastructure or employment to help support existing facilities or attract additional facilities.

Consideration must also be given to the Future Wales the National Plan 2040 which indicates a desire to designate a Green Belt “*around Newport and eastern parts of the region*”. While this is anticipated to include a large part of mid-Monmouthshire which may constrain future growth to some extent in this part of the County, it is recognised that neither options are considered to direct growth to Green Belt. Nonetheless, as a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on effects at this stage.

Overall, Option 1 performs best, providing sufficient housing and employment opportunities to meet identified housing and economic growth needs throughout the County. Further the option distributes housing in line with the settlement hierarchy, helping to meet the needs of all communities, leading to significant positive effects in the long term. Option 2 also performs positively for the reasons above, however growth is restricted in the primary settlement of Monmouth and the wider Upper Wye catchment area. Option 2 therefore is the worst performing option, with potential for significant positive effects uncertain, given the potential deterioration of existing, sustainable communities in the north east of the County, most notably the primary settlement Monmouth.



## ISA Theme: Health and Wellbeing

| Options             | 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 |
|---------------------|---|--|
| Rank                | 1   | 2  |
| Significant effect? | Yes - Positive  | Uncertain  |
| Discussion          | <p>In terms of improving the health and wellbeing of residents, both options are anticipated to lead to long term positive effects by supporting and sustaining a hierarchy of vibrant town and village centres across the County. It is considered that the focus of growth in the Primary Settlements of Abergavenny, Chepstow, and Monmouth, and Severnside settlements through Option 1 would ensure sustainable access to a range of community services and facilities, including health, leisure, and recreation; notably three of the four leisure centres in Monmouthshire are in these Primary Settlements. Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments, and community cohesion. Positive effects in this respect are also anticipated through Option 2; however, growth is excluded from settlements in the Upper Wye catchment area, including the primary settlement of Monmouth. The absence of new homes, employment, and infrastructure provision in these areas will likely exacerbate existing deficiencies seen in relation to community and recreational facilities, and more widely, sustainable communities. This could lead to a 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.</p> <p>It is recognised that there are regional infrastructure connections to be capitalised upon. Through directing an increased level of growth to the south of the County, Option 2 performs most positively in terms of supporting access to the Royal Gwent Hospital in Newport and the new critical care hospital in Cwmbran. Chepstow Community Hospital is also accessible, located to the east of the M4 corridor/ Severnside. Through distributing growth proportionately across the County's sustainable settlements, Option 1 will also support access to these health facilities in a more broader sense, with the potential for positive effects.</p> |  |

## ISA Theme: Health and Wellbeing

Both options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities/ areas. The value and importance of having access to locally accessible open/ green spaces to assist in recreation and health and wellbeing has been heightened during the pandemic and should be reflected in growth strategies. Option 1 performs most positively in this respect as growth (and therefore green infrastructure provision) is delivered throughout Monmouthshire, aiding ecological connectivity throughout the entire County. Option 2 also performs positively in this respect, however restricting growth in the Upper Wye catchment area may limit the potential for strategic green infrastructure delivery and planning gains in this respect. However conversely, restricting built development in the Upper Wye catchment area will likely maintain open countryside, green space, and high-quality landscapes present. While the quality of the landscape and spaces may differ, the presence of the nationally designated Wye Valley AONB in this location is recognised. Access to these natural spaces can lead to long term positive effects, supporting the mental and physical health and wellbeing of residents.

Nonetheless, given the rural nature of the County, it is considered that Option 1 will also lead to positive effects in terms of providing residents with access to the countryside. Both options perform well through directing a significant level of growth to Abergavenny which is located in close proximity to the Brecon Beacons National Park, and Monmouth (Option 1 only) and Chepstow which are located in close proximity to the Wye Valley AONB. Significant growth at these locations will provide access to these valued natural spaces and will likely support their protection and enhancement in the long term, leading to positive effects.

Overall, it is considered that both Options provide a significant opportunity to deliver improvements to social/ community infrastructure; provide an opportunity to deliver new and improved areas of multi-functional green infrastructure alongside development; and promote access to the countryside, which has become increasingly important in light of the pandemic. The level of infrastructure delivery is expected to be similar under all options; however, Option 2 performs less positively compared to Option 1 given growth is restricted in the Upper Wye catchment area. This could negatively impact upon the wellbeing and sustainability of communities in the northeast of the County, leading to isolation, deprivation, and personal and social health concerns.

## ISA Theme: Equalities, Diversity and Social Inclusion

| Options              | 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 |
|----------------------|--|--|
| Rank                 | 1  | 2  |
| Signif-icant effect? | Yes - Positive   | Uncertain  |
| Discu-ssion          | <p>At the time of the 2014 Welsh Index of Multiple Deprivation (WIMD) none of the 56 lower super output areas (LSOAs) in Monmouthshire were in the most deprived 10% (Ranks 1-191) in Wales or the most deprived 20% (Ranks 1-382) in Wales. However, the 2019 WIMD now shows that alongside 20 LSOAs in the 50% most deprived (doubled since 2014), 5 LSOAs were in the 30% most deprived, and 2 LSOAs were in the 20% most deprived. Almost half (47%) of the total population live in wards defined as being in rural areas (i.e., with a population of less than 10,000). Population densities are, as would be expected, highest in the towns, with the majority of rural wards having low population densities when compared to national averages. When looking at the population growth between the 2001 and 2011 Census in terms of the individual town and communities, the main towns which experienced the most growth during this period were Monmouth and Chepstow.<sup>49</sup> Therefore Option 1 which seeks to focus growth towards these Primary Settlements is anticipated to lead to long term positive effects in terms of providing increased opportunities through employment and housing provision for the younger population to live and work in Monmouthshire; enhancing the service roles of these settlements. The recent pandemic has demonstrated the importance of ensuring communities are balanced and socially sustainable, particularly in terms of demography.</p> <p>Option 2 performs positively through directing some growth to Chepstow, however limiting growth in Monmouth in light of the above has the potential to lead to negative effects, missing an opportunity to invest in one of the county's highest growing towns. The recent pandemic has demonstrated the importance of ensuring communities are balanced and socially sustainable, particularly in terms of demography. Both options will also lead to positive effects through reducing inequalities between rural and urban areas, supporting and sustaining a hierarchy of vibrant centres across the County. As above,</p> |  |

<sup>49</sup> Monmouthshire County Council (2011) Census 2011 Town and Community Council Statistics <http://www.monmouthshire.gov.uk/app/uploads/2015/08/Census-2011-Town-and-Community-Council-Statistics.pdf>

## ISA Theme: Equalities, Diversity and Social Inclusion

positive effects are greatest under Option 1 in this respect, given that growth is excluded from settlements in the Upper Wye catchment area under Option 2. Without housing, employment and infrastructure delivery, these locations may experience increased levels of inequality, isolation, and deprivation, particularly in the more rural settlements.

Monmouthshire's population profile in terms of ethnic groups is different to both the Wales average and that of the South East Wales region as a whole. At the time of the 2011 census, 98% of Monmouthshire's population classified themselves as white, compared to 95.6% in Wales and 93.7% in South East Wales.<sup>50</sup> The South East Wales figures are particularly influenced by the population profile of Cardiff which accounts for over 25% of the population of the region, and as would be expected the population profile is much more diverse in the city. Directing an increased level of growth to the south of the County through Option 2 may contribute positively towards increasing the ethnic diversity within the County. In this context, utilising strategic links to the Cardiff Capital Region and South West England will likely support cross-boundary community cohesion, and capitalise upon regional social infrastructure connections. Positive effects are also identified in this respect in relation to Option 1 to a lesser extent, recognising growth is apportioned in line with the settlement hierarchy, and given there is the potential to develop links from Abergavenny to the wider Cardiff Capital Region.

Overall, Option 1 is preferred as this option seeks to support and sustain a hierarchy of vibrant centres across the County, directing the majority of growth to the most sustainable settlements while also still delivering growth in the secondary settlements and rural areas. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. Option 1 is also anticipated to lead to positive effects in this respect, delivering affordable housing in both urban and rural areas and where there is greatest need. Option 2 also leads to positive effects in this respect, however the potential for significant positive effects are uncertain given that growth is excluded from settlements in the Upper Wye catchment area. This could lead to the isolation and deprivation of communities in the north east of the County, including the primary settlement of Monmouth where census data indicates investment/ growth should be prioritised.

<sup>50</sup> ONS 2011 Census

## ISA Theme: Transport and Movement

| Options             | 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 |
|---------------------|--|--|
| Rank                | 1  | 2  |
| Significant effect? | Uncertain  | Uncertain  |
| Discussion          | <p>Existing travel patterns in Monmouthshire reflect its rural nature, with a trend of relatively long travel to work distances, high levels of car ownership, and reliance on the private car. Specifically, in 2011, 18% of those in employment between the ages of 16-74 in Monmouthshire who travel to work travelled further than 30km to their place of work this compares to 11.3% in 2001. In 2011 10% of residents in the SE Wales region and 8.5% for Wales as a whole travelled further than 30km to their place of work.<sup>51</sup> The volume of traffic in the County has also continued to increase, up nearly 19% since 2010.<sup>52</sup> The primary points of road congestion in the region are on the M4, with regular issues of congestion near Newport reflecting the high commuter levels; affecting connectivity between Monmouthshire and Cardiff.<sup>53</sup> However, it is recognised that the recent increase in home-working as a result of the recent pandemic is likely to continue over the longer term which will likely support reduced commuting levels and congestion in the future.</p> <p>Both options seek to deliver a level of growth towards the M4 corridor, in line with the settlement hierarchy. However, an increased level of growth is focussed along the M4 corridor through Option 2, which could lead to heightened traffic levels. Despite this, it will positively link housing and employment growth, utilising connections to the M4 corridor and the removal of the Severn Bridge Tolls. This would reduce the need to travel by car, capitalising upon existing sustainable transport links such as rail at Caldicot and Severn Tunnel Junction Train Stations; and forthcoming improvements such as the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South Wales Metro. The Metro will be an integrated</p> |  |

<sup>51</sup> Monmouthshire County Council (2021) The Baseline Characteristics of Monmouthshire <https://www.monmouthshire.gov.uk/app/uploads/2021/07/The-Baseline-Characteristics-of-Monmouthshire-June-2021.pdf>

<sup>52</sup> Ibid.

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

## ISA Theme: Transport and Movement

network of bus, rail and active travel (walking and cycling) that will improve connectivity and make sustainable travel easier across South Wales. Notably, the feasibility of a Metro Bus Rapid Transit service is being explored, which would connect Monmouthshire with Cardiff, Newport, and other key routes across South Wales.<sup>54</sup>

Positive effects are also anticipated where options seek to locate a level of growth in the most sustainable Settlements within the North of the County. This is with the ambition to capitalise on strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465 (Option 1 and 2), and towards Herefordshire via the A449 and A40 (Option 1). Directing a level of growth to sustainable settlements in the north of Monmouthshire under Option 1 will also benefit from rail links to Newport, Cardiff, and the North. It is noted that Monmouth does not have a train station, and that an absence of growth under Option 2 will likely exacerbate out-commuting and car reliance in this location, placing increased pressure on existing infrastructure.

In terms of sustainable transport options available throughout the County, buses are most predominant, with the County being served by both local and national routes. The Primary Settlements of Abergavenny, Chepstow, and Monmouth all have bus stations with hourly (or more frequent) services extending to the surrounding towns and villages and to the sub-region, including Bristol, Gloucester, Hereford, Newport and Cardiff. In terms of rail provision, Monmouthshire has four railway stations, Caldicot, Chepstow and Severn Tunnel Junction in the South of the County and Abergavenny in the North. The centre and northeast of the County are poorly served by rail travel. Option 1 will therefore lead to long-term positive effects through directing growth to these Primary Settlements, capitalising upon the sustainable transport offer and supporting lower levels of car use.<sup>55</sup> Option 2 also broadly performs positively in this respect, although as set out above does not direct growth to Monmouth and therefore sustainable transport infrastructure in this location is unlikely to see investment/ improvements typically associated with new development.

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

The Active Travel (Wales) Act (2013) requires local authorities in Wales to deliver year on year improvements in active travel routes and facilities. As such, Monmouthshire has prepared a series of Integrated Network Maps (INMs) which set out the Council's plans for improving active travel routes in and around certain settlements over the next 15 years. At the time of

<sup>54</sup> TfW (2022) Cardiff Capital Region Metro <https://tfw.wales/projects/metro/south-wales-metro/work-early-development>

<sup>55</sup> Welsh Government (2018) Rolling out our Metro <https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf>

## ISA Theme: Transport and Movement

preparation, the guidance stated that the settlements should have had a population of at least 2,000 at the time of the 2001 Census. For Monmouthshire this included the settlements of Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth and Usk. However, there are existing active travel routes in smaller settlements. The maps produced show proposed future networks of key walking and cycling routes and include schemes for delivery in the next couple of years, schemes for delivery in the medium term (5-10 years), and longer-term (10-15 years) proposals of a more aspirational nature. The INMs were submitted to Welsh Government on 27 February 2018 and these have now been approved.<sup>56</sup>

Option 1 performs most positively in terms of focusing development at settlements that provide the best current and future opportunities for achieving sustainable development, which offer a choice of transport modes and contribute towards the development of a sustainable transport network. New development will likely capitalise upon existing transport infrastructure at these locations, further promoting active travel and integrated sustainable transport opportunities. Additionally, it is considered that delivering jobs and homes in these locations will likely support levels of self-containment, reducing the reliance on the car for employment. Option 2 also broadly performs positively in this respect, although as set out above does not direct growth to the key settlement of Monmouth, and therefore out-commuting and car reliance may be seen to increase in Monmouth and other settlements in the Upper Wye catchment area in the longer term.

Despite the likelihood that higher levels of homeworking will prevail following the pandemic, there is no guarantee that all residents will live and work in the same area, and a proportion are likely to continue the trend of out-commuting by car for journeys (recognising that currently only 3.6% of Monmouthshire resident working population travel to their place of work using public transport).<sup>57</sup> Congestion is notably an issue of concern in Chepstow (given the Air Quality Management Area [AQMA] present) where a large proportion of growth through Option 2, followed by Option 1, is targeted. This presents a challenge for development, as there is significant risk that this trend would be intensified.

An appropriate amount of development is also allocated through both options to Severnside; with a lower level of growth to the County's secondary settlements and rural areas, recognising that in many rural areas there is often no accessible sustainable transport offer. Infrastructure provision is notably lacking in rural areas in the North of the County, and it is recognised that a Welsh Government (and subsequent Local Transport Plan (2015)) priority is to *"maximise the contribution that effective and affordable transport services can make to tackling poverty and target investment to support improvements in accessibility for*

<sup>56</sup> Monmouthshire County Council (2019) Sustainable Settlement Appraisal (draft)

<sup>57</sup> ONS Census 2011



## ISA Theme: Transport and Movement

*the most disadvantaged communities*". It is noted that this has been partly addressed by a 'grass routes' bus service<sup>58</sup>, which could be utilised through both options, supporting the growth of rural communities. However, further improvements to accessibility in these settlements are unlikely to be achieved as growth would not be of a critical mass to support significant infrastructure delivery. Directing growth to the rural settlements will therefore likely promote unsustainable travel patterns, with (despite a likely higher level of homeworking) a proportion of residents continuing to travel by car to existing centres to access services and employment.

It is recognised that both Options have the potential to contribute positively towards the Welsh Government's commitment to reducing reliance on the private car and supporting the transport hierarchy and a modal shift to walking, cycling and public transport (Planning Policy Wales (PPW) (2021). Option 1 is identified as best performing through directing growth to the Primary Settlements, which are all multi-modal transport hubs that benefit from active travel routes, existing railway stations (at Abergavenny and Chepstow only) and frequent bus services. The Primary Settlements are also well placed geographically to take advantage of the strategic road network in the County. Option 1 is therefore most likely to promote a safe, efficient, accessible and sustainable transport system that supports self-containment at the Primary Settlements; providing opportunities for walking and cycling and encouraging active travel.

Similar to Option 1, Option 2 will also lead to long term positive effects through supporting the transport hierarchy and modal shift in the majority of the County's main settlements. However, excluding growth from settlements in the Upper Wye catchment area, including primary settlement Monmouth, has the potential to exacerbate out-commuting and private vehicle use in these areas, which could place increased strain on the existing road network.

At this stage the potential effects are considered to be uncertain until further evidence base work is carried out relating to the impacts of growth on the highway network.

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<sup>58</sup> A demand responsive bus service available during the week for all residents of Monmouthshire and accommodation providers who are members of the scheme



## ISA Theme: Natural Resources

| Options             | 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 |
|---------------------|--|--|
| Rank                | =  | =  |
| Significant effect? | Yes – Negative   | Yes - Negative   |
| Discussion          | <p>In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.<sup>59</sup> The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMA) declared at Primary Settlement Chepstow and Secondary Settlement Usk for NO<sub>2</sub>.<sup>60</sup> Both options direct a level of growth to these locations, with the potential to exacerbate existing air quality issues through increased road users and subsequent increased levels of congestion. Effects are likely to be slightly greater under Option 2 given the level of growth directed to these locations is greater (reflecting the limited growth to the Upper Wye catchment area). Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. The Air Quality Action Plans for both areas contain many transport-related measures, which are reflected through the adopted LTP (2015),<sup>61</sup> and the emerging LTP, which will inform the RDLP. In accordance with the LTP and higher-level policy frameworks, Options are anticipated to deliver mitigation where possible; ensuring the location of new development does not worsen conditions in the AQMAs, or result in the declaration of new ones. Further, the pandemic has resulted in higher levels of homeworking which are likely to prevail in the longer-term, reducing congestion pressures on air quality. In this context, both options will likely further support the increased use of sustainable transport and reduced reliance on the private vehicle through delivering homes that are well located to services, facilities, and employment in existing centres. Conversely, there is concern regarding the impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area. This may exacerbate out-commuting and reliance on the private car, worsening air quality in the northeast of the County.</p> |  |

<sup>59</sup> World Health Organisation (2019) Ambient air pollution: Health impacts <https://www.who.int/airpollution/ambient/health-impacts/en/>

<sup>60</sup> Air Quality in Wales (2019) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

<sup>61</sup> Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

## ISA Theme: Natural Resources

Development under both Options has the potential to lead to positive effects through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the CCR City Deal. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which would likely provide opportunity for building more sustainable communities and improved air quality

There is a limited supply of brownfield land in the County, with the average percentage of housing completions on brownfield land over the past 13 years totalling approximately 50%.<sup>62</sup> The lack of brownfield land in the urban areas is a concern for the RLDP, with limited opportunities existing in the Primary Settlements only. Option 1 is therefore best performing in this respect, as while growth is likely to be predominately greenfield development, brownfield land within the Primary Settlements will be utilised where possible. Option 2 also performs positively in this respect through directing growth to the most sustainable Settlements with the exception of Monmouth.

Monmouthshire has a significantly high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). All options are therefore likely to result in the loss of some areas of BMV agricultural land, leading to significant long term negative effects against this ISA theme.

In terms of differentiating between the Options, it is considered that directing growth to the existing main settlements through Option 1 will help to protect best and most versatile agricultural land in the rural areas. Option 2 also performs positively in this respect through directing growth to the County's main settlements with the exception of Monmouth. However, it is recognised that there are limited opportunities for brownfield development within the County's existing urban areas, and that the delivery of both options would inevitably lead to loss of greenfield land, as discussed above. Therefore, as all settlements are constrained to some extent by BMV agricultural land it is difficult to rank the two options. Option 2 could be ranked less positively given the Option limits development to the north (specifically settlements in the Upper Wye catchment area), and will increase development towards most constrained locations of Severnside and the M4 corridor.

While mineral extraction plays a limited role in Monmouthshire's economy, there remains a need to safeguard the County's mineral resources in order to make an appropriate contribution to the sustainable supply of aggregates to the wider South Wales economy. However, it is considered that development would be located away from safeguarded areas under both

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<sup>62</sup> Monmouthshire Housing Land Availability Surveys 2008 - 2021

## ISA Theme: Natural Resources

options, with neutral effects predicted. The options are also considered to lead to neutral effects in terms of waste, as it is considered that both options are capable of being served by appropriate waste infrastructure.

In terms of water quality, a key issue for development is river phosphate levels, reflecting new evidence detailing the damaging effects of phosphates to water ecosystems and species. At present, over 60% of waterbodies in Wales fail against NRW's new (2021) targets, and Welsh local planning authorities are being asked to take more action to avoid further deterioration of the environment. As discussed further under the 'Biodiversity' ISA theme, development within SAC river catchments - in particular those that will generate increased volume or concentration of wastewater - are now required to demonstrate that the design will not contribute to increased phosphate levels.<sup>63</sup> It is considered that mitigation may be achievable for the River Usk catchment area (Llanfoist WWTW), but a feasible solution at the Monmouth WWTW, linked to the River Wye Catchment is improbable during the Plan period. Option 2 therefore performs positively by directing growth away from the River Wye catchment area; an appropriate step to avoid the deterioration of the SAC. Option 1 conversely has the potential to contribute to the accumulation of excess phosphorus in the land and water environment, directing a level of growth towards primary settlement Monmouth, and other settlements in the Upper Wye catchment area in line with the settlement hierarchy. Option 1 therefore performs negatively against this ISA theme, with the potential for significant effects.

Water is supplied to Monmouthshire by the Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small, localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the

<sup>63</sup> Natural Resource Wales (2021) Tighter phosphate targets change our view of the state of Welsh rivers <https://naturalresources.wales/about-us/news-and-events/news/tighter-phosphate-targets-change-our-view-of-the-state-of-welsh-rivers/?lang=en>

## ISA Theme: Natural Resources

company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

Both options are anticipated to deliver neutral effects in terms of impact on water resources, with no best performing Option identified. This is given the legal requirements in place for WRMPs, and that both Options are assumed to deliver the same level of growth throughout the Plan period. It is expected that development coming forward under either of the Options will be encouraged to be water efficient and may deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day. This is in accordance with PPW11 (2021) which outlines the contributions planning can make, including *“ensuring resilient locational choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability.”*

Overall, in terms of water resources and quality, Option 1 performs least positively, given the potential to contribute to the accumulation of excess phosphorus in the land and water environment of the Upper Wye catchment area. Conversely Option 1 is best performing in terms of utilising brownfield land, protecting BMV agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Nonetheless Option 2 may hold reduced opportunities to develop on lower grade agricultural (and brownfield) land, and could exacerbate air quality issues in light of likely increased growth at Chepstow. It is therefore difficult to meaningfully rank the options, with both performing equally at this stage.

Both options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

## ISA Theme: Biodiversity and Geodiversity

| Options             | Option 1 - 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 |
|---------------------|--|--|
| Rank                | 2  | 1  |
| Significant effect? | Yes - Negative   | Yes - Negative   |
| Discussion          | <p>It is assumed that development proposed under either of the options would not result in the loss of any international, national, or locally designated sites for biodiversity.</p> <p>However, a key issue for development is the potential impact on phosphorus levels in Welsh river SACs, i.e., the River Wye and River Usk in Monmouthshire. In January 2021 NRW published a report which presented an assessment of how much phosphorus there is in SAC rivers measured against revised water quality targets. The evidence review showed that over 60% of the water bodies assessed in SAC river catchments were failing to meet the revised water quality targets for phosphorus.<sup>64</sup> New developments such as housing can lead to increased amounts of phosphorus entering the river environment from additional wastewater. Under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. A HRA is currently being revised for the RDLP, which will determine the impact on the designated sites and their features. It is considered that mitigation may be achievable for the River Usk catchment area (Llanfoist WWTW), but a feasible solution at the Monmouth WWTW, linked to the River Wye Catchment is improbable during the Plan period. Option 2 therefore performs positively by directing growth away from the River Wye catchment area; an appropriate step to avoid the deterioration of the SAC. Option 1 conversely has the potential to contribute to the accumulation of excess phosphorus in the land and water environment, directing a level of growth towards primary settlement Monmouth, and other settlements in the Upper Wye catchment area in line with the settlement hierarchy. Option 1 therefore performs negatively against this ISA theme, with the potential for significant effects.</p> |  |

<sup>64</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/compliance-assessment-of-welsh-river-sacs-against-phosphorus-targets/?lang=en>

## ISA Theme: Biodiversity and Geodiversity

More broadly, it is considered that additional development proposed through both options could impact on the European sites discussed above through the loss and fragmentation of linear foraging habitats for bat species, atmospheric pollution, and increased disturbance (recreation, noise, and light). However, it is difficult to rank options in this respect given the specific location of sites is unknown, and that both options direct growth across the County.

Both options have the potential to lead to negative effects on numerous internationally designated sites which extent throughout the Primary and Secondary Settlements. Most significantly, options have the potential to impact upon water quality in the River Usk and Wye, with Option 1 likely to lead to significant negative effects due to focusing a level of growth towards primary settlement Monmouth, which falls within the Upper Wye catchment area. Uncertain effects are predicted for both options at this stage in relation to the River Usk SAC, which passes through Abergavenny and Usk which is also constrained by nutrient loading to some extent.

In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the northwest of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Growth is directed to Abergavenny through both options, and therefore has the potential to adversely impact upon SSSIs, including Sugar Loaf Woodlands SSSI and Coed-Y-Person SSSI. Impacts are most likely to arise as a result of increased recreational disturbance, with effects likely to be greater through Option 2 given higher growth is anticipated. There is also a cluster of SSSIs to the east of the County around Monmouth, and dispersed in the rural landscape between Monmouth and Chepstow in the south, which may also be impacted by both options, with Option 1 performing least positively given much growth is focused at Monmouth. Notably Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs) and may be impacted by high growth at Monmouth under Option 1.

There are also several SSSIs along the M4 corridor and to the southern extent of the County, including the Gwent Levels SSSI and component SSSIs under the Severn Estuary SAC as discussed above. A level of growth is directed to the south through Option 2 (and to an extent through Option 1), with impacts most likely to arise as a result of increased recreational disturbance, water pollution, and air pollution.<sup>65</sup> It is considered that in relation to designated sites, the nature and

<sup>65</sup> Natural England (2015) Site Improvement Plan: Severn Estuary Mor Harfen <http://publications.naturalengland.org.uk/publication/4590676519944192>

## ISA Theme: Biodiversity and Geodiversity

significance of effects will ultimately depend on the precise location of development and the implementation of mitigation measures.

In terms of locally important biodiversity, there is just one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. Cleddon Bog LNR is located within the Wye Valley AONB in the rural landscape and is not likely to be affected by either of the Options. Monmouthshire also includes approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs)). These predominantly relate to grassland and ancient and semi-natural woodland areas. SINCs are dispersed throughout the County, and it is considered that development coming forward under either of the Options could have localised impacts on these designed sites.

In addition to designated sites, both Options have the potential to result in adverse effects on biodiversity through loss of greenfield land and priority habitats. Habitat fragmentation is a key issue for the County; for example, fragmentation of hedgerows caused by development and canalised streams and rivers. While both options locate growth across the County, it is recognised that Option 2 avoids new allocations in the Wye Catchment, and therefore performs more positively overall.

Overall, it is considered that both options have the potential to adversely impact upon the County's biodiversity resource, with the potential for significant residual negative effects. The focus of development in all Primary Settlements through Option 1, and some Primary Settlements through Option 2, has the potential to result in increased pressure on the environment, due to concentrating growth in locations around the existing main settlements in the North where a number of internationally/nationally designated biodiversity sites are located. Notably, the main distinction between the options is that Option 1 focuses growth at the Primary Settlement of Monmouth, which has the potential to lead to additional phosphorus loading, which in turn will lead to significant ecological damage. Option 2 is therefore best performing, excluding development from the Upper Wye catchment area to protect the integrity of the SAC.

Finally, it is noted that Options have the potential to deliver positive effects on biodiversity through enhancement measures. However specific details on this delivery are currently uncertain, and therefore it is difficult to rank the Options. Ultimately the nature and significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.



## ISA Theme: Historic environment

| Options             | Option 1 - 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 |
|---------------------|---|--|
| Rank                | =   | =  |
| Significant effect? | Uncertain   | Uncertain  |
| Discussion          | <p>There is one internationally designated site falling partially within the County; Blaenavon Industrial World Heritage Site (WHS), located to the west of Abergavenny. The WHS was inscribed by UNESCO in 2000 on account of its industrial landscape having Outstanding Universal Value (OUV). A Management Plan has been prepared for the period 2018-2023 a suite of policies for the continued effective protection, conservation, presentation, and transmission of the Site's OUV.<sup>66</sup></p> <p>There are also a range of designated heritage assets and archaeological areas within the County, including over 30 Conservation Areas, 45 Historic Parks and Gardens, three Landscapes of Outstanding Historic Interest, over 160 Scheduled Monuments, over 2,000 Listed Buildings, and 10 Archaeologically Sensitive Areas.</p> <p>It is considered that both options are likely to have an impact on the historic environment given the volume of heritage assets located throughout the County, and the broad distribution of growth under both options. Notably growth at the Primary Settlements in the North will result in increased pressure on the rich historic environment present; including the WHS and its setting, extensive Conservation Areas (all of which contain numerous Listed Buildings), Registered Parks &amp; Gardens, and Grade 1 Listed Buildings, at Abergavenny, Chepstow, and Monmouth. Together with their settings, these heritage assets require protection and enhancement, in accordance with the WHS Management Plan (2018), Conservation Area Appraisals and requirements of Planning Policy Wales (PPW) (2021). It is considered that Option 1 has the potential for negative effects of greatest significance, while Option 2 performs marginally better given no growth is proposed at Monmouth. Option 2 will preserve the historic environment in Monmouth (and the settlements in the Upper Wye catchment area), maintaining the historic landscape and setting of towns and villages, and key features/ assets, and protecting settlement identity.</p> |  |

<sup>66</sup> Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018-2023  
<http://modern.gov.torfaen.gov.uk/documents/s35685/Blaenavon%20WHS%20Management%20Plan%20FINAL%20SEPTEMBER%202018.pdf>



## ISA Theme: Historic environment

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

The South of the County is also sensitive in terms of the historic environment. Notably, constraints include the ASA which extends across the M4 corridor; Portskewett, Caldicot and Major/ Undy contain Grade I Listed Buildings; Rogiet contains four listed buildings at risk; the Gwent Levels Registered Landscape of Outstanding and of Special Interest covers areas of Caldicot, Undy and Magor; and there are numerous Conservation Areas present. Option 2 focuses more growth to the south than Option 1 and therefore has the potential to adversely impact upon archaeological and/ or historic assets, their settings, and intrinsic qualities. However as discussed above, development also has the potential to deliver neutral/ positive effects through having a positive contribution to an area's character or appearance.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. Neither of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Overall, it is difficult to rank the Options in terms of preference against this ISA Objective; Option 2 arguably performs slightly more positively than Option 1 given it protects the historic town of Monmouth from housing and employment development. However, this would impact upon the visitor economy in Monmouth which contributes towards the management of historic assets. Furthermore, Option 2 directs increased growth towards Abergavenny and the WHS, with the potential to impact on the significance of the asset.

It is considered that the significance of effects will ultimately be dependent on the precise location and design/ layout of development as well as the implementation of mitigation measures.

## ISA Theme: Landscape

| Options             | 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 |
|---------------------|---|--|
| Rank                | 2   | 1  |
| Significant effect? | Uncertain   | Uncertain  |
| Discussion          | <p>Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County incorporates:</p> <ul style="list-style-type: none"> <li>• <b>Wye Valley AONB</b> located to the east of Monmouthshire. The part of the Wye Valley AONB located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.</li> <li>• <b>Brecon Beacons National Park</b> located to the northwest of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.</li> </ul> <p>In line with Planning Policy Wales (PPW) (2021) it is recognised that the Wye Valley AONB and Brecon Beacons National Park are “valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.” In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to “Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”. Notably, Objective WV-D2 seeks to “encourage and support high standards of design, materials, energy efficiency, drainage and landscaping in all developments”.<sup>67</sup> In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development management functions in the correlating part of the County. The LDP “represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park.”<sup>68</sup> While</p> |  |

<sup>67</sup> Wye Valley AONB Joint Advisory Committee (2016) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2015 – 2020 <http://www.wyevalleyaonb.org.uk/index.php/publications/>

<sup>68</sup> Brecon Beacons National Park Authority (2019) Brecon Beacons National Park Local Development Plan (2018 – 2033) Preferred Strategy Consultation Document <https://www.beacons-npa.gov.uk/planning/draft-strategy-and-policy/local-development-plan-review/preferred-strategy/>

## ISA Theme: Landscape

protection is provided at the higher level, it is nonetheless considered, given the level of growth proposed through both Options, that development has the potential to adversely impact upon special landscape features, character, and setting.

The focus of development in the Primary Settlements in the North through Option 1 (and to a lesser extent Option 2 recognising growth is excluded from Monmouth), is anticipated to result in increased pressure on landscape character, setting, and the intrinsic qualities of the AONB and National Park. This is given both options direct a significant level of growth to Abergavenny which is located in close proximity to the National Park and Option 1 directs a significant level of growth to Monmouth which is located in close proximity to the Wye Valley AONB. Chepstow is also located in close proximity to the AONB, with growth directed here under both options (likely greater level of growth through Option 2).

It is noted that directing growth away from Monmouth and the wider Upper Wye catchment area through Option 2 will contribute positively towards the preservation of the landscape in this location, including the AONB. This is likely to ensure the preservation of open countryside, with the potential for positive effects, particularly given the sensitivity of the landscape in the north of the County.

Overall, it is considered that Option 1 is worst performing as it directs the highest level of growth in close proximity to the AONB and National Park. Option 2 is best performing however given Monmouthshire's rural nature and the landscape assets present, Option 2 is also predicted to lead to negative effects as a result of development in the South. However, given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, options are found to have an uncertain effect at this stage.

## ISA Theme: Climate Change

| Options             | 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 |
|---------------------|---|--|
| Rank                | 2   | 1  |
| Significant effect? | Uncertain   | Uncertain  |
| Discussion          | <p>Development proposed under either of the Options has the potential to incorporate renewable or low carbon energy, EV charging and smart infrastructure which can support more resilient community infrastructure. There are three substantial main rivers that pass through Monmouthshire, the Rivers Wye, Usk and Monnow and a number of smaller but significant ones are the River Trothy, Olway and Neddern. Monmouthshire is at risk from all types of flooding: surface water, ordinary watercourses, groundwater, rivers, and the sea. Both the towns and rural areas are at risk from surface water flooding to various extents during heavy rainfalls. The terrain of the County with its hills, valleys and plains is also at risk of flooding from watercourses. It is considered that the River Wye has the potential to affect more properties than the others.</p> <p>In line with the Flood Risk Regulations (2009), the Preliminary Flood Risk Assessment (PRFA) process has been carried out in order to establish the level of flood risk within the area. Subsequently, a Flood Risk Management Plan (FRMP) has been produced (2016) which sets out the findings of the PFRA. The FRMP highlights that in terms of fluvial flood risk, communities at most risk from a 1 in 1000-year flood (Flood Zone 2) are Monmouth, Abergavenny and Usk. Communities most at risk of 1 in 1000-year surface flooding (Flood Zone 2) were Caldicot, Abergavenny, and Chepstow. Monmouth, Magor/Undy, Llanfoist Fawr, Usk, and Portskewett all feature as part of the top ten communities at risk from surface water flooding. As such, directing growth to the most sustainable Settlements has the potential to lead to long term negative effects, given these settlements have been identified as high flood risk areas. In terms of ranking the options, Option 1 has the potential for negative effects of greatest significance, while Option 2 performs marginally better given no growth is proposed at Monmouth. Nonetheless, it is considered that all new development will accord with the revised Technical Advice Note 15: Development, Flooding and Coastal Erosion (2021) in advance of its formal release in June 2023, which sets out a</p> |  |

## ISA Theme: Climate Change

precautionary framework to direct new development away from those areas which are at high risk of flooding. Furthermore, in accordance with national policy MCC are clear that development would not be located in highly vulnerable flood risk areas.

Overall, Option 2 is ranked as the best performing option given it does not direct growth to Monmouth, which has been identified as one of the most vulnerable settlements to flooding. However, both options direct growth to high flood risk settlements and therefore have the potential to lead to negative effects. It is however recognised that there is a level of uncertainty for both Options at this stage, and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level.

## Summary findings and conclusions for spatial strategy options

| ISA Themes                                 | Rank/ Significant effects | Categorisation and rank   |  |
|--|---------------------------|---|--|
|  |                           | Option 1 - 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  |

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.

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.

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.

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 surrounding higher tier settlements 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.

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.



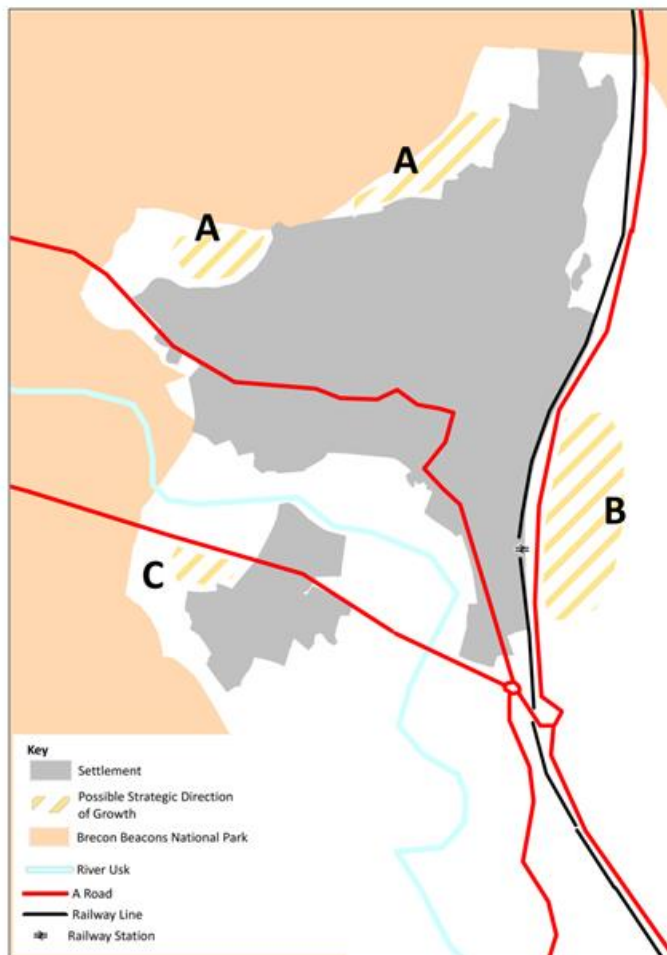
## Appraisal of strategic growth areas

In 2021, the Council identified a number of potential strategic growth areas/ options for each of the Primary Settlements and Severnside. These options were consulted on as part of the 2021 Preferred Strategy. The options are presented in Figures B1 – B4 overleaf

A comparative appraisal of growth areas/ options within each settlement and Severnside was carried out in 2021 for each ISA Theme. The appraisal assumed that each option would deliver the same quantum of growth. While superseded, this appraisal has been included in this appendix for completeness, and to demonstrate the iterative nature of the Council's strategic site selection process. The 2021 findings are presented in the subsequent tables.

Preferred Strategic Site Allocations have since been selected from the 13 Strategic Growth Areas. The appraisal of these Preferred Strategic Site Allocations is presented in Appendix C.

### Abergavenny



**Figure B1 Abergavenny potential strategic growth locations**

## ISA Theme: Economy and employment

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

## ISA Theme: Economy and employment

considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option A is considered best performing given it is reasonably well connected with the town centre and employment opportunities; and is not detached by the A465; as is the case for Options B and C. Option B performs more positively than Option C given it's distance to Abergavenny railway station, and would support the uptake of sustainable travel to access employment opportunities outside of the County as long as suitable links to the railway station are delivered.

| ISA Theme: Population and communities |   |                |                |
|---------------------------------------|---|----------------|----------------|
| Options                               | Option A  | Option B       | Option C       |
| Rank                                  | 1   | 2              | 3              |
| Significant effect?                   | Yes - Positive  | Yes - Positive | Yes - Positive |
| <b>Discussion</b>                     | <p>All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term positive effects are predicted in this respect.</p> <p>There are however significant differences between areas of Abergavenny town, as reflected by the range in the average house prices. While some housing is amongst the most expensive in the County, Lansdown and Priory wards, which include the central area of the town northeast of the main shopping area, are much less desirable locations to live.<sup>69</sup> It is therefore considered that further growth to the north through Option A may lead to positive effects in terms of promoting regeneration in the north of the town, supporting the growth of existing communities and reinforcing Abergavenny's position in the settlement hierarchy as a Tier 1 Primary Settlement. It is however noted that Option A is approximately a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. While this is well connected comparatively with other Options it is noted that some residents (notably elderly and those with young children) may rely on the car for access.</p> <p>Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the options from the town centre, approximately a 2.4 mile or a 57-minute walking distance. Option B is a similar walking distance to Option A however would involve crossing the A465. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to support sustainable communities.</p> <p>While disconnected from the town centre, Option C nonetheless would be an extension of Llanfoist to the west of the town. As such it is considered that development at this location would lead to positive effects through integration with the</p> |                |                |

<sup>69</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

## ISA Theme: Population and communities

existing sub-urban community, providing a level of infrastructure to support the smaller settlement. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.

Overall, Option A, followed by Option B perform most positively against this ISA theme as they are the most well connected with the town centre, its services and facilities, and sustainable travel. Option A is most likely to support the growth/ regeneration of Abergavenny as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.

## ISA Theme: Health and wellbeing

| Options             | Option A   | Option B | Option C |
|---------------------|--|----------|----------|
| Rank                | 1  | 2        | 2        |
| Significant effect? | No   | No       | No       |
| <b>Discussion</b>   | <p>Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny, which has a minor injury unit. Option A is 900m/ a 17-minute walk from the hospital. Option C is 1.2km from the hospital by car, however walking distance is 2.8 miles/ 58 minutes. Option B is the least well located, being over 3km from the hospital. In terms of GP surgeries, there are three located within Abergavenny, close to the town centre. Options A and B are within 1km / 18-minute walking distance of a GP surgery. Option C is considerably further from health facilities in the town centre, approximately 2.4km from Old Station Surgery. However, if travelling by car, Option C is also within 1km.</p> <p>Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands, and good road links to Cwmbran, Newport, Monmouth and the motorway system. Option B is best performing in terms of access to the railway station, which is located adjacent to the site to the west. Options A and B are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.</p> <p>All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop unless new bus stops are provided, and Option C has access to a bus stop on the B424; however, this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre.</p> |          |          |

## ISA Theme: Health and wellbeing

The town's proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

Overall, Options B and C perform on a par in relation to the Health and wellbeing ISA theme. Option A is best performing in terms of proximity to health services. Option A performs similarly to other options in terms of supporting healthy forms of transport to reach health (and wider) services/ facilities. Option A is less well located in terms of access to the train station; however, it is recognised that the Abergavenny circular bus service provides improved access to some extent.

## ISA Theme: Equalities, diversity and social inclusion

| Options             | Option A  | Option B | Option C |
|---------------------|---|----------|----------|
| Rank                | 2   | 3        | 1        |
| Significant effect? | No  | No       | No       |
| Discussion          | <p>Abergavenny is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Abergavenny will lead to positive effects on new and existing residents' quality of life, supporting regeneration and creating more positively integrated communities. It is however noted that Option B is detached from residential development by the A465, which may reduce potential for positive integration with existing communities.</p> <p>In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD) looking at Abergavenny, and specifically the growth Options:</p> <ul style="list-style-type: none"> <li>• Option A is within the 80% - 100% least deprived LSOAs in Wales;</li> <li>• Option B is within the 40% most deprived - 60% least deprived LSOAs in Wales; and</li> <li>• Option C is within the 40% most deprived - 60% least deprived LSOAs in Wales.</li> </ul> <p>As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting some of the most deprived communities through Options B and C, positive effects are likely to be enhanced to some degree. Option C seeks to positively expand upon Llanfoist village to the west of Abergavenny.</p> <p>While not notably deprived itself, Option A performs positively through reducing inequalities between sub-urban and urban areas, given that the two most deprived LSOAs in Monmouthshire (Cantref 2 (ranked 459 out of 1896 in Wales) and Mardy 1 (ranked 286) are closely located to Option A, to the northeast of Abergavenny.</p> |          |          |



## ISA Theme: Equalities, diversity and social inclusion

Option A also performs most positively of the Options in terms of ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, especially those without access to private vehicles. Option C is least well performing in this respect as is the furthest of the options from the town centre (2.4km). Option B is a similar walking distance to Option A; approximately a mile or a 20-minute walking distance.

Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, Option C is predicted to lead to positive effects of greater significance through targeting deprived areas; promoting equality and social inclusion through developing more inclusive communities. Option B performs least well of the Options given it is severed from the settlement by the A465, which may reduce potential for positive integration with existing communities.

## ISA Theme: Transport and movement

| Options             | Option A  | Option B | Option C |
|---------------------|---|----------|----------|
| Rank                | =   | =        | =        |
| Significant effect? | No  | No       | No       |
| Discussion          | <p>In terms of the strategic transport network, Abergavenny is closely linked to the A465, and plays an important role on the Heads of the Valleys road through its links to Brecon, Mid Wales and the wider Cardiff Capital Region. While levels of self-containment are high in Abergavenny, there remains a reliance on the car as the primary mode of transport, and therefore traffic throughout the town is a significant issue. In addition to high levels of through traffic currently experienced, it is noted that a high percentage of the overall travel to work flows for the County would be to Abergavenny. All Options are well located in terms of access to the strategic transport network (the A465 extends east and west of the main settlement), and it is considered that development under all Options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.</p> <p>Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands. However, of the Options, only Option B is well located in terms of access to the railway station, being located adjacent to the site to the west. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links. All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop, and Option C has access to a bus stop on the B424, however this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre. Option B performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within the town, and for wider commuter journeys.</p> |          |          |

## ISA Theme: Transport and movement

The town's proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the Options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel. While Option B would arguably provide the greatest opportunity for residents to capitalise upon a range of sustainable transport options; located adjacent to the railway station, and with access to the Brecons Way bridle, it is considered that the separation of the option from the main settlement by the A465 may reduce its potential to encourage a modal shift. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.

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

| Options             | Option A   | Option B       | Option C       |
|---------------------|--|----------------|----------------|
| Rank                | 1  | 2              | 3              |
| Significant effect? | Yes - Negative   | Yes - Negative | Yes - Negative |
| <b>Discussion</b>   | <p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option A is best performing in this respect, being a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. However, this is arguably not an achievable walking distance for all residents (notably the elderly and families with young children), with many people still likely to rely on the car for access. Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the Options from the town centre, 2.4 miles away. Option B is a similar walking distance to Option A. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to promote sustainable travel. Option B has the potential to encourage modal shift given it is located adjacent to the railway station; however, suitable pedestrian links would need to be delivered for crossing the A465. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. Options B and A are therefore best performing in terms of potential to improve air quality in the town.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).<sup>70</sup> The area containing Option C was found to be entirely Grade 2, while the area containing Option B was found to be partially Grade 2 and partially Grade 3a. Option A was the only Option found to include an area of land that is not BMV, containing Grade 2 and 3b. Option A is therefore best performing in this respect, as it would necessitate the least amount of loss of</p> |                |                |

<sup>70</sup> The Predictive ALC model for Wales (2019) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

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

|  |   |
|--|---|
|  | <p>BMV land. All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.</p> <p>None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.</p> <p>Overall, all Options perform negatively against this ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing of the Options as it may encourage active travel to some extent, given its location 1 mile from the town centre; and is the least constrained Option in terms of BMV agricultural land. Option B performs more positively than Option C as it is located adjacent to the railway station, which may encourage modal shift.</p> |
|--|---|

### ISA Theme: Biodiversity and geodiversity

| Options             | Option A   | Option B       | Option C       |
|---------------------|--|----------------|----------------|
| Rank                | 1  | 1              | 2              |
| Significant effect? | Yes - Negative   | Yes - Negative | Yes - Negative |
| Discussion          | <p>In terms of European sites, it is recognised that the HRA (2021) screening of the Preferred Strategy policies found that potential residential or employment sites in Abergavenny are likely to have nutrient neutrality implications for the River Usk SAC, because it is served by WwTWs discharging into the upper reaches of the SAC. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated given the level of development is considered equal across all options.</p> |                |                |

## ISA Theme: Biodiversity and geodiversity

In terms of differentiating between the Options, Option A is located 1km south of the Sugar Loaf Woodlands Special Area of Conservation (SAC), and Option C is located approximately 200m south of the River Usk SAC. Taking each European site in turn:

- **The Sugar Loaf Woodlands SAC** comprises 173.1ha of broad-leaved deciduous woodland (76.7%), and heath and scrub (23.3%). The site has been designated for its area of old sessile oak woods near the south-eastern fringe of the habitat's range. This is the largest in the UK and Europe.
- **The River Usk SAC** covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area.

In addition to the water quality issue set out above, the HRA screening (2021) found that there is the potential for development to significantly affect the River Usk through recreation, and water quantity, level and flow. As such, this site and potential impact pathways will be considered in more detail through the Appropriate Assessment stage.

In terms of the Sugar Loaf Woodlands SAC, given the distance (more than 200m) from the nearest major road, adverse impacts are not anticipated on the site through atmospheric pollution. The SAC lies approximately 1km from the Strategic Growth Area of Abergavenny, indicating that it is likely to be within walking distance for new local residents. However, Natural Resources Wales' Core Management Plan does not refer to recreational pressure as a potential management requirement for the site.<sup>71</sup> It is therefore concluded that there will be no likely significant effects of the Monmouthshire RLDP on the Sugar Loaf Woodlands SAC and the site can be screened out from Appropriate Assessment.

It is therefore considered that Option C performs most negatively in terms of potential impact on the River Usk SAC, given its close proximity. However, given the impact pathways identified, all Options have the potential to lead to adverse effects on the European site. It is however noted that effects may be less significant under Options A and B. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.

<sup>71</sup> Countryside Council for Wales (2008) Core Management Plan for Sugar Loaf Woodlands SAC/SSSI  
[https://naturalresources.wales/media/674063/Sugar\\_Loaf\\_Woodlands\\_core\\_management\\_plan\\_Mar\\_2008%20\\_A\\_.pdf](https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20_A_.pdf)

## ISA Theme: Biodiversity and geodiversity

There is a range of nationally and locally designated biodiversity located around Abergavenny. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Usk SSSI through recreation, water quality and water quantity, level and flow. Option C performs most negatively in this respect given the proximity of the Option to the European designated site.

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

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

Overall, all options have the potential to lead to long term significant negative effects as a result of nutrient neutrality implications for the River Usk SAC. In terms of ranking the Options, given the presence of the River Usk SAC/ SSSI, Option C is worst performing of the Options, with the greatest potential for negative effects on biodiversity. However, given the impact pathways identified through the HRA for the SAC, it is considered that Options A and B also have the potential to impact upon the European designated site; however, effects are likely to be less significant. Options A and B are also constrained in terms of potential indirect effect on Ancient Woodland; while all Options are constrained in terms

## ISA Theme: Biodiversity and geodiversity

of potential adverse effects on habitats present within/ surrounding the Options (i.e., through habitat loss and recreational disturbance). It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.



## ISA Theme: Historic environment

| Options             | Option A   | Option B  | Option C  |
|---------------------|--|-----------|-----------|
| Rank                | 2  | 1         | 3         |
| Significant effect? | Uncertain  | Uncertain | Uncertain |
| <b>Discussion</b>   | <p>Option A is located to the north of Abergavenny and would extend the existing built-up area toward the boundary with the Brecon Beacons National Park. Development would be in close proximity to the northern boundary of the Abergavenny Conservation Area and a number of listed buildings. It is assumed development would not extend beyond Pentre Lane or Deri Road into the National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the National Park and the Conservation Area. However, this is uncertain at this stage.</p> <p>Option B is located to the east of the A465 and apart from some listed buildings near the train station, it's not in close proximity to any designated heritage assets. However, as you move further away from the town and the A465 the elevation increases, and development is likely to be become more visible from the settlement and the World Heritage Site (WHS) and National Park across the town. Furthermore, in terms of the wider historic environment this option would extend the built area beyond the A465, a natural barrier to the town for many years, into the countryside. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed, and the layout takes account of any important views into and from heritage assets within and beyond the settlement. However, this is uncertain at this stage.</p> <p>Option C is located to the north west of Llanfoist, between the B4246 and the Heads of the Valleys Road. It would extend the built-up area to the boundary with the Brecon Beacons National Park as well as the Blaenavon Industrial Landscape WHS. Additionally, there are two listed buildings in close proximity to the growth area. It appears that the majority of the growth area sits at a lower elevation than the WHS, National Park and the Heads of the Valley Road. As a result, development is unlikely to significantly affect any views in or out from the WHS or the National Park. Development could affect the setting of a Grade II listed building (Glan nant-y-llan) on Church Lane but it's possible that development could avoid the area in the south east adjacent Church Road, which is slightly more elevated and therefore more visible</p> |           |           |

## ISA Theme: Historic environment

in terms of the WHS and National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed and the layout takes account of any important views into and from the National Park, WHS and the listed building off Church Lane. However, this is uncertain at this stage.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Given uncertainties no significant differences between the options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the setting of designated heritage assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect proximity to designated heritage assets. While there are a significant number of uncertainties at this stage, Option B is considered to be less sensitive in terms of the historic environment compared to the other options.

Development at Option A and particular Option C are more likely to affect internationally and nationally designated heritage landscapes and natural landscapes that have shaped development over time and contribute to the character of the area and settlement identities. By its proximity to the WHS as a significant heritage asset, development under Option C is least preferred.

## ISA Theme: Landscape

| Options             | Option A  | Option B       | Option C  |
|---------------------|---|----------------|-----------|
| Rank                | 3   | 1              | 2         |
| Significant effect? | Yes - Negative  | Yes - Negative | Uncertain |
| Discussion          | As a largely rural County, Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Abergavenny, the built-up area to the north and west extends close to the Brecon Beacons National Park (BBNP) boundary and Llanfoist adjoins the Blaenavon World Heritage Site (WHS). In line |                |           |

## ISA Theme: Landscape

with Planning Policy Wales (2018) it is recognised that these designated assets are “*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.*”<sup>72</sup> In addition to national policy requirements, protection is also provided to the Brecon Beacons National Park through the established Local Development Plan (2007) in place and development control functions in the correlating part of the County.<sup>73</sup> In terms of the WHS, the Blaenavon WHS Management Plan (2018) identifies an overall vision and key principles for the management of the WHS.<sup>74</sup>

While protection is provided at the higher level, it is nonetheless considered that Options A and C have the potential to adversely impact upon special landscape features, character and setting of the BBNP and WHS. Development to the north through Option A and to the north west of Llanfoist through Option C, would expand the existing built up area toward the boundary with the BBNP; and Option C also has the potential to adversely impact upon the setting of the WHS. It is however possible that Options could accommodate development without any significant residual negative effects on the landscape as long it is sensitively designed, and the layout takes account of any important views into and from the BBNP and WHS. However, this is uncertain at this stage.

It is also noted that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA’s sensitivity to residential development.<sup>75</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Abergavenny. However, looking specifically at the Options in turn:

- **Option A** is categorised as being of high/medium landscape sensitivity to residential development.
- **Option B** is categorised as having high/medium landscape sensitivity to residential development.

<sup>72</sup> Welsh Government (2018) Planning Policy Wales

<sup>73</sup> Brecon Beacons National Park Authority (2013) Brecon Beacons National Park Authority Local Development Plan

<sup>74</sup> Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018 - 2023

<sup>75</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

## ISA Theme: Landscape

- **Option C** is categorised as having medium landscape sensitivity to residential development.

Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the intrinsic qualities, character and setting of designated landscapes/ assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) findings. Option C is therefore identified as best performing given it is the only Option with 'medium' sensitivity to residential development; however, this Option still has the potential to result in significant negative effects. Option A is worst performing given the potential impact on the BBNP; its open character and hillside setting. It is however noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

| ISA Theme: Climate change |  |           |           |
|---------------------------|--|-----------|-----------|
| Options                   | Option A   | Option B  | Option C  |
| Rank                      | 2  | 1         | 3         |
| Significant effect?       | Uncertain  | Uncertain | Uncertain |
| <b>Discussion</b>         | <p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p>  |           |           |
|                           | <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between options.</p>   |           |           |
|                           | <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all options perform equally in this respect.</p>  |           |           |
|                           | <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement, with good public transport links connecting residents with employment and services within and outside the County; notably Cwmbran, Newport, Cardiff and the Midlands. Option B arguably provides the greatest opportunity for residents to capitalise upon a range of sustainable transport options given its location adjacent to Abergavenny railway station. However, it is considered that the separation of the Option from the town centre by the A465 may result in heavy reliance on the car for primary mode of travel. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.</p> |           |           |

## ISA Theme: Climate change

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Usk is a constraint to the south of the town and in parts of Llanfoist. Looking specifically at the Options, Option B is located within Flood Zone A, and is not at risk of flooding. However, Option C is at high risk of flooding, with a proportion of the Option located within Flood Zones B/ C. Option A includes a very small area within Flood Zones B/ C; extending north to south in the centre of the Option. It is however noted that development under Options B and C could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, however given the presence of the A465 may result in increased reliance on the car for primary mode of travel. As such, effects on climate change in this respect are uncertain. Option C is worst performing of the Options, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.

## Summary findings and conclusions for growth level options

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

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

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

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

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

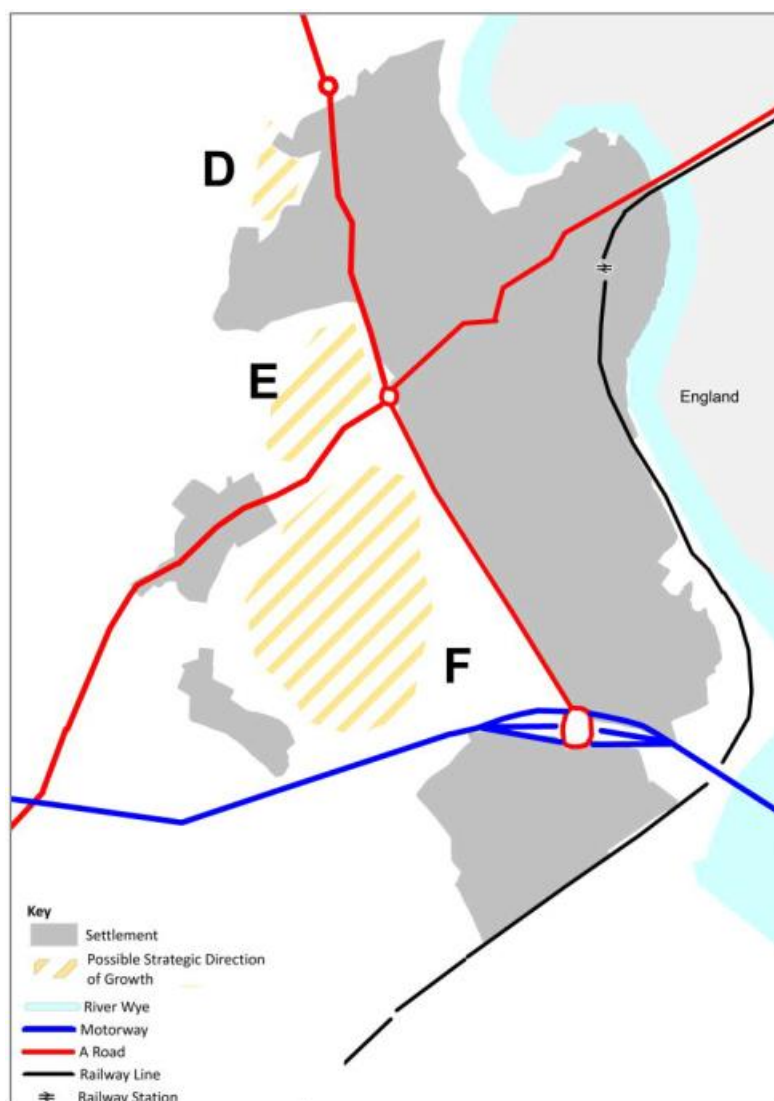
Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and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

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



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

## Chepstow



**Figure B.2 Chepstow potential strategic growth locations**

## ISA Theme: Economy and employment

| Options             | Option D   | Option E | Option F |
|---------------------|--|----------|----------|
| Rank                | 3  | 2        | 1        |
| Significant effect? | No   | No       | No       |
| <b>Discussion</b>   | <p>Chepstow plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Of all of the settlements appraised in the Sustainable Settlement Appraisal (December 2022) it achieved the second highest weighted score, not far behind Abergavenny. Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England and associated economic opportunities. These opportunities have been enhanced given the recent removal of the Severn Bridge Tolls. Option F is arguably best located in this respect, given its location adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west.</p> <p>In terms of facilities and services present, the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. Option E is best performing in terms of access to the town centre, being less than a mile or a 15-minute walking distance. Option D is approximately 1.3km or a 15-minute walk from the town centre, while Option F is furthest away from the town centre at approximately 1.4 miles or a 29-minute walk.</p> <p>Chepstow is also one of the main focuses of employment within the County. Chepstow has a good range of employment sites within the town, with the largest being the Newhouse Farm Industrial Estate located to the south of the town on the motorway junction with the M48. In terms of access to this employment site, Option F is best performing, being located to the southwest of the settlement, with Option D worst performing being located furthest north. Nonetheless, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Chepstow.</p> <p>It is also noted that a high percentage of residents cross the River Severn daily to work in Bristol. Option F is therefore best performing in terms of access to the Severn Bridge and M48, supporting access to wider employment opportunities outside of the County.</p> |          |          |

## ISA Theme: Economy and employment

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Although least well connected with the town centre, Option F is considered best performing given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town.

| ISA Theme: Population and communities |   |                |                |
|---------------------------------------|---|----------------|----------------|
| Options                               | Option D  | Option E       | Option F       |
| Rank                                  | =   | =              | =              |
| Significant effect?                   | Yes - Positive  | Yes - Positive | Yes - Positive |
| <b>Discussion</b>                     | <p>All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.</p> <p>There are significant differences between areas of Chepstow as reflected by the range in the average house prices; St Kingsmark ward has the highest prices and St Christopher ward the lowest.<sup>76</sup> It is therefore considered that further growth to the south of Chepstow through Option F may lead to positive effects in terms of promoting regeneration in the south of the town, expanding upon the existing town centre/ retail uses and increasing the potential customer base. This would likely lead to further positive effects in terms of promoting the growth/ regeneration of existing communities and reinforcing Chepstow's position in the settlement hierarchy. However, it is noted that Option F is detached to some extent from the main built up area by the A466, and may not integrate well with the existing community. Option F may also negatively impact upon the identity of smaller, distinct communities in the open countryside to the west of the main settlement, notably between Chepstow and Pwllmeyric and Mathern. Option E may also perform negatively in this respect, between Chepstow and Pwllmeyric. Conversely, however, directing growth to smaller, suburban settlements would likely promote sustainable communities; improving access to the motorway and railway station for employment, wider services and facilities. Options D and E would extend the built up area of Bayfield to the north and south, respectively. Development at this location would likely more positively integrate with the existing community, providing a level of infrastructure to support the settlement and improve connections with the main town centre to the east.</p> <p>Overall, it is not considered possible to differentiate between the options at this stage. All options perform positively in terms of supporting the growth/ regeneration of Chepstow as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.</p> |                |                |

<sup>76</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

| ISA Theme: Health and wellbeing |  |          |          |
|---------------------------------|--|----------|----------|
| Options                         | Option D   | Option E | Option F |
| Rank                            | =  | =        | =        |
| Significant effect?             | No   | No       | No       |
| <b>Discussion</b>               | <p>Chepstow does not include a hospital; however it is supported by Chepstow Community Hospital which includes two GP practices; Mount Pleasant and Town Gate surgeries. Chepstow Community Hospital is located to the west of the settlement, adjacent to the A466. In terms of access to the Community Hospital and associated GP surgeries, Option E is best performing, followed closely by Option D, with Option F least well performing. However, all Options are within 1 mile of the Community Hospital and therefore considered to have good access to health services. For wider hospital services (i.e. A&amp;E and Minor Injuries Unit), The Grange University Hospital in Cwmbran, which is the main hospital in the area, is approximately 34.4km from Chepstow, and there is also the Royal Gwent Hospital located in Newport; 18 miles from Chepstow, respectively. Option F is best located in terms of access to wider hospital services to the east and west, given the close proximity to the M48, to the south of the Chepstow.</p> |          |          |
|                                 | <p>Being located close to the M48, Option F also has the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e. through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.</p>  |          |          |
|                                 | <p>While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466, however this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.</p>  |          |          |

## ISA Theme: Health and wellbeing

Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to distinguish between the Options at this stage, with all options providing residents with good access to health services and supporting active travel.

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



| ISA Theme: Transport and movement |   |          |          |
|-----------------------------------|---|----------|----------|
| Options                           | Option D  | Option E | Option F |
| Rank                              | =   | =        | =        |
| Significant effect?               | No  | No       | No       |
| Discussion                        | <p>In terms of the strategic transport network, Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England. It is also recognised that the recent removal of the Severn Bridge Tolls has enhanced accessibility in this respect. Given its location adjacent to the M48, Option F is arguably the most well located of the Options, connecting with the M4 and Newport/ Cardiff to the south west.</p> <p>While levels of self-containment are high in Chepstow, there are consequently substantial daily flows of commuters to and from the town, with levels of car reliance high. The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.</p> <p>While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.</p> |          |          |

## ISA Theme: Transport and movement

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all options may increase traffic through the town, leading to adverse effects on air quality and the Chepstow AQMA, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel.

| ISA Theme: Natural resources (air, land, minerals and water) |   |                |                |
|--|---|----------------|----------------|
| Options  | Option D  | Option E       | Option F       |
| Rank   | =   | =              | =              |
| Significant effect?  | Yes - Negative  | Yes - Negative | Yes - Negative |
| <b>Discussion</b>  | <p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, this is particularly apparent through the Air Quality Management Area (AQMA) present at Chepstow (and another at Usk). Chepstow AQMA is located in the centre of the town, encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace. Chepstow AQMA was designated in 2007 for levels of NO<sub>2</sub>; predominately caused by vehicle emissions from through traffic in the town centre. Options E and F are located adjacent to the AQMA, to the west of the A48 and the A48/ A458 roundabout. It is therefore considered that new development at these Options would lead to increased vehicular use within the AQMA, resulting in heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality. While Option D is located further from the AQMA, to the north west of the town, residents will have to travel in to the AQMA to access services and facilities within Chepstow town centre, contributing to air quality issues. Negative effects are therefore predicted for all Options.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC grades at each of the Options has been based on predictive mapping. The area containing Options D and E were found to be entirely Grade 2, while the area containing Option F was found to be predominately Grade 1 with smaller areas of Grade 2 and Grade 3a. All Options therefore perform equally, given all are wholly located within BMV agricultural land, leading to the permanent loss of this resource. All Options also comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.</p> |                |                |

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

All Options are considered to perform equally in terms of demand for water, and impact on water quality. All of the Options fall within the limestone minerals safeguarding area, and therefore also perform equally in terms of impact on the County's mineral resource.

Overall, all Options are considered to perform equally against this ISA theme. Options are anticipated to have long term negative effects through increased vehicular use within Chepstow AQMA, and the 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.

| ISA Theme: Biodiversity and geodiversity |   |           |           |
|--|---|-----------|-----------|
| Options                                  | Option D  | Option E  | Option F  |
| Rank                                     | 1   | 2         | 3         |
| Significant effect?                      | Uncertain   | Uncertain | Uncertain |
| <b>Discussion</b>                        | <p>In terms of European sites, the Wye Valley Woodland SAC is located 600m east of Option D, 900m east of Option E, and 1.2km north east of Option F. The River Wye SAC is located 800m east of Option D, 1km east of Option F, and 1.5km east of Option E. Taking each SAC in turn:</p> <ul style="list-style-type: none"> <li>• <b>The Wye Valley Woodland SAC</b> is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.</li> <li>• <b>The River Wye SAC</b> covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.</li> </ul> <p>HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Wye Valley Woodland SAC through atmospheric pollution; and for development to affect the River Wye SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow. As such, the European sites, and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.</p> |           |           |

## ISA Theme: Biodiversity and geodiversity

There is a range of nationally and locally designated biodiversity located around Chepstow. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow; and to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

All Options are also constrained by Ancient Woodland:

- Bishops Barnet Wood and Great Barnet Wood is 100m northeast of Option D;
- A small area of Ancient Woodland is located north of Option E, south of Moun-ton Road; and
- There are two distinct areas of Ancient Woodland located within Option F, including East Wood.

There is the potential for development at Option F to have a significant negative effect on biodiversity through direct loss of this important habitat and associated species, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Effects are likely to be indirect through Options D and E given the proximity to the habitats. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing habitats where possible; delivering biodiversity net-gain. This may include creating ecological corridors and connecting biodiversity sites, notably through Option F.

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

## ISA Theme: Biodiversity and geodiversity

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

## ISA Theme: Historic environment

| Options             | Option D   | Option E  | Option F       |
|---------------------|--|-----------|----------------|
| Rank                | 1  | 1         | 2              |
| Significant effect? | Uncertain  | Uncertain | Yes - Negative |
| <b>Discussion</b>   | <p>Option D does not contain any designated heritage assets within the growth area. Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west from the edge of the growth area. There is also a Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) situated to the north east across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure and it forms an important element within the wider later prehistoric context and within the surrounding landscape. It's possible that the site could accommodate development without any significant residual negative effects on the scheduled monument and wider historic environment as long it is sensitively designed; however, this is uncertain at this stage.</p> <p>Option E does not contain any designated heritage assets but there are three listed buildings in close proximity, one to the north close to Moun-ton Road and two to the south on the other side of the A48. The growth area is adjacent to the Mathern Conservation Area and is approximately 600m from the Moun-ton Conservation Area and a cluster of listed buildings that lie within it to the west. It's possible that the site could accommodate development without any significant residual negative effects on the Conservation Areas if development does not extend beyond St Lawrence Lane and it is sensitively designed with appropriate screening, and the layout takes account of views into and from the conservation areas. Another consideration in terms of the historic environment for growth in this area will be impacts on the St Lawrence House Grade II Listed Building in the north and it is likely that its setting would be affected by development in this area.</p> <p>Option F contains 16 listed buildings and is located entirely within the Mathern Conservation Area. Development within this growth area would result in the loss of large areas of greenfield/ open space within the Mathern Conservation Area and around the listed buildings present. There is the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area; however, there is some uncertainty at this stage.</p> |           |                |



## ISA Theme: Historic environment

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

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

## ISA Theme: Landscape

| Options             | Option D   | Option E       | Option F       |
|---------------------|--|----------------|----------------|
| Rank                | 2  | 1              | 3              |
| Significant effect? | Yes - Negative   | Yes - Negative | Yes - Negative |
| <b>Discussion</b>   | <p>As a largely rural County Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Chepstow, the area immediately north of the town lies within the Wye Valley Area of Outstanding National Beauty (AONB). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be <i>“valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.”</i><sup>77</sup> In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to <i>“Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”</i>. While protection is provided at the higher level, it is nonetheless considered that Options D and E have the potential to adversely impact upon the AONB, its special landscape features, character and setting.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>It is also noted that land to the west of the A466 is currently protected by a ‘Green Wedge’ policy to ensure the town’s physical separation from Pwllmeyric and Mathern. Part of Option E (the area between Moun-ton Road and the A48) and part of Option F (the area between the A48 and the M48) falls within the Green Wedge. It is considered that development at this location could lead to coalescence between Chepstow and Pwllmeyric (under Option E) and Chepstow and Pwllmeyric and Mathern (under Option F).</p> |                |                |

<sup>77</sup> Welsh Government (2018) Planning Policy Wales

## ISA Theme: Landscape

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>78</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Chepstow. However, looking specifically at the Options in turn:

- **Option D** is categorised as being of medium landscape sensitivity to residential development.
- **Option E** is a mixture of medium and high/medium landscape sensitivity to residential development.
- **Option F** is categorised as high landscape sensitivity to residential development

Overall, all Options are particularly sensitive in terms of the landscape, with the potential for significant long term negative effects. Depending on the design and layout of development, Options D and E could potentially affect the intrinsic qualities, character and setting of the AONB, while Option F could impact upon the sensitivity of the settlement itself; being located on sloping parkland/ and partial designation as a 'Green Wedge'. In terms of ranking the Options, assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB. For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

<sup>78</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

| ISA Theme: Climate change |   |          |          |
|---------------------------|---|----------|----------|
| Options                   | Option D  | Option E | Option F |
| Rank                      | =   | =        | =        |
| Significant effect?       | No  | No       | No       |
| <b>Discussion</b>         | <p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p>   |          |          |
|                           | <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.</p>   |          |          |
|                           | <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.</p>   |          |          |
|                           | <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement with good public transport links connecting residents with employment and services within and outside the County; notably bus services run to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham. However, the A48, which provides the main link between the southern</p> |          |          |

## ISA Theme: Climate change

part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all Options has the potential to result in increased vehicular use in and around Chepstow.

In terms of managing flood risk to address climate change, while it is recognised that the east of the town is constrained by the River Wye, all Options are located to the west of the Chepstow and therefore are at low risk of flooding.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, the presence of the A48 (and connectivity with the M48 and M4 corridor), may result in increased reliance on the car for primary mode of travel, exacerbating air quality issues in the centre of the town and within Chepstow AQMA. As such, residual effects on climate change are uncertain.

## Summary findings and conclusions for growth level options

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

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

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

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

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

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

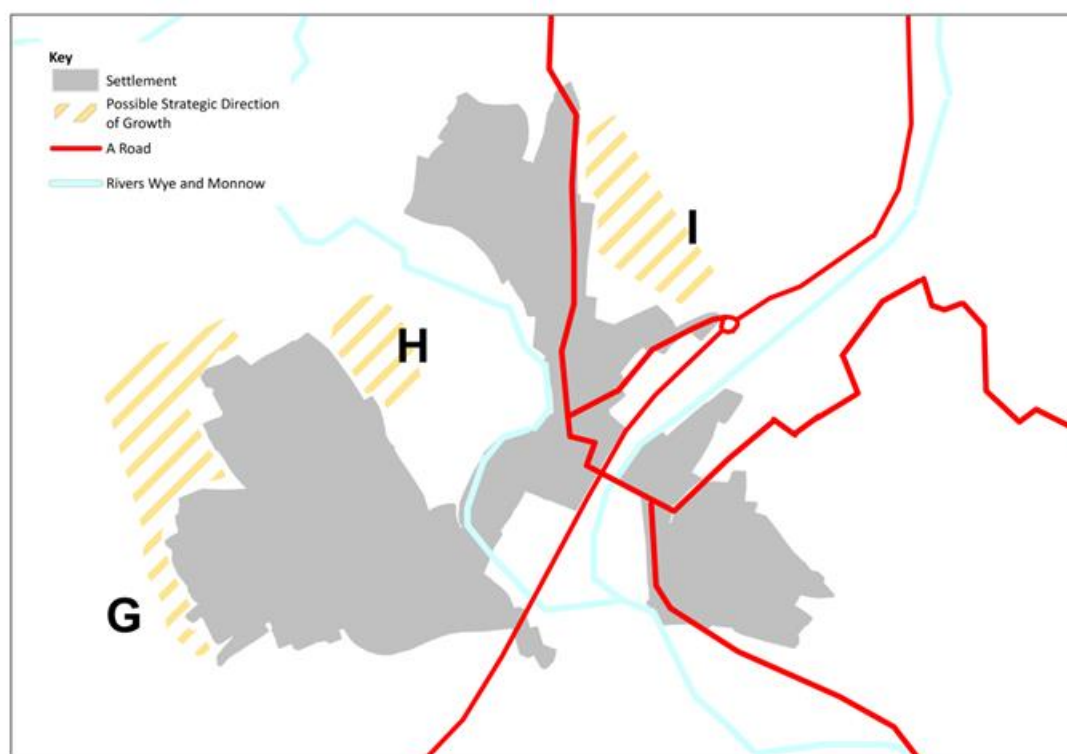
All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update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

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

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

## Monmouth

As set out above, it is noted that strategic growth areas for Monmouth were previously consulted on in the 2021 Preferred Strategy. Monmouth has since been ruled out as an option for strategic growth (see Section 5.20), however this historic appraisal is included below for completeness.



**Figure B.3 Monmouth potential strategic growth locations**



## ISA Theme: Economy and employment

| Options             | Option G   | Option H | Option I |
|---------------------|--|----------|----------|
| Rank                | 2  | 1        | 3        |
| Significant effect? | No   | No       | No       |
| <b>Discussion</b>   | <p>Monmouth plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. It has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466) and has a range of bus services to the South Wales cities and to Gloucestershire and Herefordshire. Option I notably has good access to the A40 and A466.</p> <p>In terms of facilities and services present, Monmouth scores well within the settlement appraisal, given its relatively large number and good range of shops and restaurants, and is a vibrant focus for the surrounding area. Option H performs most positively in this respect, being centrally located and approximately 0.5 miles / 11-minute walk from town centre. Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk. Option G would likely rely on the car for day-to-day access to services and facilities in the centre, via the A40/ A466.</p> <p>Monmouth is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town. Monmouth's largest employment area is an Industrial Estate to the South West of the settlement. There has also been recent strategic growth to the south west of the town with a mixed-use development to the west of the Wonastow Estate allocated under the current LDP, which is near completion. In terms of access to employment to the southwest of the town, Option G is best performing, being located adjacent to employment focussed along Wonastow Road. There is also opportunity for Option G to extend upon the existing Wonastow industrial estate. Option H is located 1.1 mile/ 23-minute walk from Wonastow Road, while Option I is least well performing of the Options in this respect, being located 1.8 miles/ 36-minute walk from employment opportunities to the south of the town. Residents at Option I would therefore likely be reliant on the car for access. Nonetheless, all Options perform positively in terms of providing access to local employment sites, supporting levels of self-containment in Monmouth.</p> |          |          |

## ISA Theme: Economy and employment

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Option H is best performing as it is most centrally located in terms of access to the town centre, its services and facilities, and is within reasonable distance of employment opportunities to the south of the town. Option G also performs well given its location adjacent to the Wonastow Estate employment site; however, it is most distant from the town centre. Option I is reasonably well located in terms of the town centre but performs poorly in terms of access to Wonastow Estate.

| Theme: Population and communities |  |                |                |
|-----------------------------------|--|----------------|----------------|
| Options                           | Option G   | Option H       | Option I       |
| Rank                              | 2  | 1              | 1              |
| Significant effect?               | Yes - Positive   | Yes - Positive | Yes - Positive |
| Discussion                        | All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.  |                |                |
|                                   | There are significant differences between areas of Monmouth as reflected by the range in the average house prices; Dixon with Osbaston ward has the highest house prices and Wyesham ward the lowest. <sup>79</sup> All Options direct growth to the north of the A40, away from Wyesham which is located to the south of the town. Option I is located in close proximity to Dixon, to the north east of the Option.  |                |                |
|                                   | All Options have the potential to support the growth of existing communities; however, this is likely to be more achievable through Options H and I, given their location in terms of access to the town centre (0.5 miles/ 11-minute walk from Option H, and 0.7 miles/ 13 minute walk from Option I). Notably Option H would extend existing built form at Over Monnow, while Option I would extend the suburb of Obaston to the north east of Monmouth, supporting regeneration at these locations. Option G is arguably more isolated in this respect, being less well connected to the town centre (1.4 miles and a 28-minute walk). Nonetheless, all Options would likely integrate positively with existing communities present, providing a level of infrastructure to support the sub-areas and improve connections with Monmouth town centre. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure. |                |                |
|                                   | Overall, it is considered that all Options perform positively in terms of supporting the growth/ regeneration of Monmouth as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands. In terms of ranking Option G performs least well given its distance from the town centre, services and facilities. It is not possible to  |                |                |

<sup>79</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

| Theme: Population and communities |   |
|-----------------------------------|---|
|                                   | differentiate between Options H and I at this stage, as both connect well with the town centre and existing communities on the outskirts of the settlement. |

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

| ISA Theme: Health and wellbeing |   |
|---------------------------------|---|
|                                 | Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to differentiate between the Options at this stage, with all options providing residents with good access to health services and supporting accessibility by healthy forms of transport. |

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

**ISA Theme: Equalities, diversity and social inclusion**

centre, its amenities and facilities, being approximately 0.7 miles or a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk.

Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. In terms of ranking the Options, Option G and H are likely to deliver positive effects of greater significance than Option I as growth is targeted towards more deprived areas. Option H however is best located in terms of supporting vulnerable groups with access to services in the town centre, and Options G and I perform well through reducing inequalities between sub-urban and urban areas to the north and southeast of the town. It is therefore not considered possible to differentiate between the Options at this stage.



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

| ISA Theme: Transport and movement |  |
|-----------------------------------|--|
|                                   | extent, particularly given the absence of a railway station. It is therefore considered that Options cannot be differentiated between at this stage. |

| ISA Theme: Natural resources (air, land, minerals and water) |  |                |                |
|--|--|----------------|----------------|
| Options  | Option G   | Option H       | Option I       |
| Rank   | 1  | 2              | 3              |
| Significant effect?  | Yes - Negative   | Yes - Negative | Yes - Negative |
| Discussion   | <p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. All Options are considered to perform equally in this respect, given all Options direct growth towards a Tier 1 settlement, with good access to the strategic transport network and town centre; supporting modal shift to reduce reliance on the car and subsequently reduce NO<sub>2</sub> emissions. However, given the absence of a railway station and the strategic road links to Newport (A449), Abergavenny (A40) and the Midlands (A466), there is likely to be a continued reliance on the private vehicle for travel.</p> |                |                |
|  | <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2017).<sup>80</sup> The area containing Option I was found to be entirely Grade 2, and the area containing Option H was found to be entirely Grade 3a. The area containing Option G however was found to be partially Grade 3a and partially Grade 3b. Option G is therefore best performing of the Options, given it includes a reduced amount of BMV agricultural land.</p>   |                |                |
|  | <p>All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Option G is best performing in relation to protecting the County's soil/ land resource.</p>   |                |                |

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

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

None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options are considered to perform equally in terms of impact on air quality, and the County's mineral and water resource. However, all Options perform negatively against this ISA theme overall with the potential for significant effects, as all Options would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. In terms of ranking the Options, Option G is best performing given it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

| ISA Theme: Biodiversity and geodiversity |  |                |                |
|--|--|----------------|----------------|
| Options                                  | Option G   | Option H       | Option I       |
| Rank                                     | 1  | 1              | 2              |
| Significant effect?                      | Yes - Negative   | Yes - Negative | Yes - Negative |
| <b>Discussion</b>                        | <p>In terms of European sites, it is recognised that the HRA screening (2021) of the Preferred Strategy policies found that potential residential or employment sites in Monmouth, are likely to have nutrient neutrality implications for the River Wye SAC, because they are served by WwTWs discharging into the upper reaches of the SAC. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated between given the level of development is considered equal across all options.</p> <p>In terms of differentiating between the options, the River Wye SAC is located approximately 600m east of Option I, approximately 1.2km east of Option H, and 1.4km east of Option G. Option I is also within 800m of the Wye Valley Woodland SAC. Taking each SAC in turn:</p> <ul style="list-style-type: none"> <li>• <b>The River Wye SAC</b> covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.</li> <li>• <b>The Wye Valley Woodland SAC</b> is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.</li> </ul> <p>In addition to the blanket water quality issue highlighted above for all options, the HRA Screening (2021) found that there is the potential for development to significantly affect the River Wye SAC through atmospheric pollution, recreation, and water quantity, level and flow, and for development to affect the Wye Valley Woodland SAC through atmospheric</p> |                |                |

## ISA Theme: Biodiversity and geodiversity

pollution. As such, these sites and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. Given the proximity of Option I to both SACs, it is considered that this Option has the potential to lead to negative effects of greatest significance.

There is a range of nationally and locally designated biodiversity located around Monmouth. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow. Option I has the potential to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are hedgerows/trees/ dense scrub extending along the field boundaries of Option G, and there is a corridor of mature trees running along the boundary of Option I. Therefore, development at Option I, and to a lesser extent Option G, has the potential to lead to negative effects on biodiversity through direct loss of habitats and associated species present, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing biodiversity where possible; delivering net-gain. This may include creating/ expanding upon ecological corridors and enabling habitat connectivity; notably through Option I.

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

## ISA Theme: Biodiversity and geodiversity

considered that Options G and H perform similarly in relation to the biodiversity ISA theme. All Options have the potential to deliver positive effects through biodiversity enhancement/ net gain.

| ISA Theme: Historic environment |  |           |           |
|---------------------------------|--|-----------|-----------|
| Options                         | Option G   | Option H  | Option I  |
| Rank                            | 1  | 2         | 3         |
| Significant effect?             | Uncertain  | Uncertain | Uncertain |
| <b>Discussion</b>               | <p>There are no designated heritage assets within or in close proximity to Option G. This growth area is approximately 500m from the significant number of heritage assets present within the settlement and separated by the existing built up area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.</p>  |           |           |
|                                 | <p>There are no designated heritage assets within or adjacent to Option H. There are a number of listed buildings to the north east and east in close proximity to the River Monnow. To the south east of the growth area lies the Monmouth (Central) Conservation Area which includes a significant number of listed buildings. There are also a number of scheduled monuments, including Monmouth Castle. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth (Central) Conservation Area. However, this is uncertain at this stage.</p>  |           |           |
|                                 | <p>There are no designated heritage assets within Option I; however, there is the Monmouth (Dixton) Conservation Area to the south east which contains two scheduled monuments and five listed buildings. There are also three listed buildings to the north west on the other side of the A466. The boundary of the Monmouth (Central) Conservation Area extends up the A466 near the south of the growth area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth Central and Dixton Conservation Areas, listed buildings and scheduled monuments. However, this is uncertain at this stage.</p> |           |           |



## ISA Theme: Historic environment

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Overall, Option G is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. It is not possible to identify any significant differences between Options H and I at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

## ISA Theme: Landscape

| Options             | Option G   | Option H     | Option I       |
|---------------------|--|--------------|----------------|
| Rank                | 1  | 2            | 2              |
| Significant effect? | Uncertain  | Yes-Negative | Yes - Negative |
| <b>Discussion</b>   | <p>As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Monmouth, the area immediately south east of the settlement is the Wye Valley Area of Outstanding Natural Beauty (AONB). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be <i>“valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.”</i><sup>81</sup> In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2016), which sets out five Development Strategic Objectives, underpinning the AONB aim to <i>“Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”</i>. Given the location of the Options to the west and north of Monmouth, it is not considered that any of the Options will impact on the AONB or its setting.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.</p> <p>It is also noted that Option H is considered to have a high amenity value and is designated in the current adopted LDP as an ‘Area of amenity importance’ under Policy DES2 (Areas of Amenity Importance). In accordance with Policy DES2 <i>“development proposals on areas of amenity importance will only be permitted if there is no unacceptable adverse effect on the visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces [...or...] linked areas of green infrastructure in terms of its contribution to the character of the locality”</i>. The delivery of Option H therefore has the potential to impact upon the important qualities of this area, with the potential for long term negative effects.</p> |              |                |

<sup>81</sup> Welsh Government (2018) Planning Policy Wales

## ISA Theme: Landscape

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>82</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Monmouth. However, looking specifically at the Options in turn:

- **Option G** is categorised as high to medium landscape sensitivity to residential development.
- **Option H** is categorised as high/medium sensitivity to residential development.
- **Option I** is categorised as having a high/medium sensitivity to residential development.

Overall, Option G is less sensitive in terms of the landscape, and development in this area is therefore less likely to result in a residual negative effect compared to the other Options. Given uncertainties no significant differences between Options H and I in terms of the nature and significance of effects could be identified at this stage, and will likely be dependent on the precise scale, layout and design of growth. Furthermore, both options are identified as having high/medium sensitivity to development through the Landscape Sensitivity Update Study (2020), and are both constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance'). Options H and I are therefore ranked equally, with the potential for negative effects. For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

<sup>82</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

| ISA Theme: Climate change |   |           |           |
|---------------------------|---|-----------|-----------|
| Options                   | Option G  | Option H  | Option I  |
| Rank                      | =   | =         | =         |
| Significant effect?       | Uncertain   | Uncertain | Uncertain |
| <b>Discussion</b>         | <p>Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p>   |           |           |
|                           | <p>In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.</p>  |           |           |
|                           | <p>All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.</p> <p>It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform reasonably well in this respect through directing growth towards a Tier 1 settlement; however, given the absence of a railway station, the existing high levels of congestion in the town and the presence of the often congested A40 and A466, there may be a continued reliance on the private vehicle for travel.</p> |           |           |

## ISA Theme: Climate change

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Wye is a constraint throughout the centre of the town and in parts of Over Monnow. However, all Options are located away from areas at high risk of flooding, within Flood Zone A.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, given the presence of the A40, A466, and absence of a railway station, there is likely to be a continued reliance on the car as the primary mode of travel. Effects on climate change are therefore uncertain.

## Summary findings and conclusions for growth level options 2021

| 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      |

The 2021 appraisal of strategic growth areas concluded:

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

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

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

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

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

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

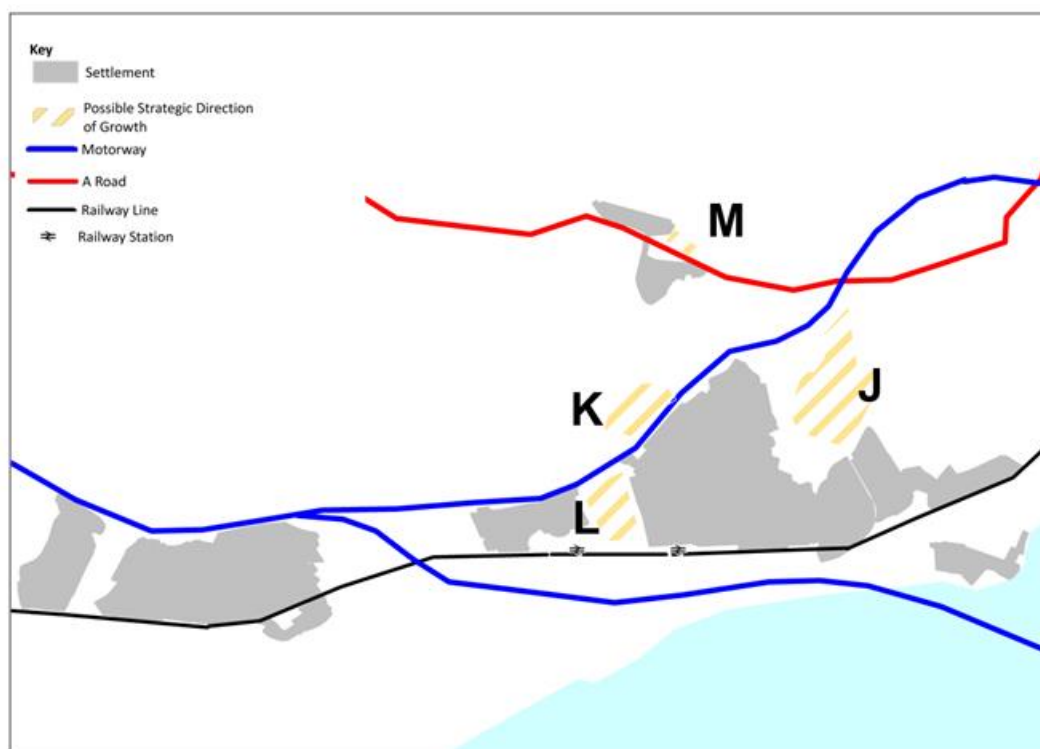
The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of

nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of this riverine SAC will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered; i.e. through biodiversity net-gains, and enhancement of, designated assets.

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



## Severnside



**Figure 4.4 Severnside potential strategic growth locations**

## ISA Theme: Economy and employment

| Options             | Option J   | Option K | Option L | Option M |
|---------------------|--|----------|----------|----------|
| Rank                | 2  | 2        | 1        | 3        |
| Significant effect? | No   | No       | No       | No       |
| <b>Discussion</b>   | <p>Caldicot is classified as a Primary Settlement within the RLDP settlement hierarchy, and has functional transport links with the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick, which together are considered to share characteristics to make up the identifiable group of Severnside. The Severnside area has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, and as a whole is well located for the nearby employment markets of Newport, Cardiff and Bristol. There are key rail links to these employment markets with stations at Rogiet and Caldicot connecting with the key settlements of Cardiff in the West and Bristol /Cheltenham/Midlands in the east. There are also good road links to the M4 and M48 motorways, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the west, and Chepstow to the east. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.</p> <p>In terms of facilities and services present, Caldicot and Magor and Undy are identified as higher tier settlements and therefore provide the greatest range of services and facilities of all the Severnside settlements. Option L therefore performs most positively of the options, given it is 1 mile/ 19-minute walking distance from Caldicot town centre. Following this, Option K is approximately 1.4 miles, a walking distance of 26 minutes; and Option J is approximately 1.9km and approximately 22-minutes walking distance. Option M is 2.1 miles from Caldicot town centre, although it is appreciated there are some limited facilities, such as a Post Office, in the nearest settlement of Caerwent.</p> <p>Employment sites are present throughout the Severnside area. Notably, Severnside Industrial Estate is located to the south east of Caldicot, which is a significant employment base and separates Caldicot from neighbouring Portskewett. Options J and L are best performing in terms of access to this employment site, given these Options would extend the built settlement of Caldicot, south of the M48. Option K followed by Option M is less well located in this respect; however, they are still considered to be able to access the site. There is also land allocated for employment to the North West of Magor/ Undy with</p> |          |          |          |

## ISA Theme: Economy and employment

the established Magor Brewery site and Wales One Business Park. These sites are relatively distant from all Options; however, they still have the potential to be capitalised upon via the M48/M4 corridor.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option L is best performing as it is most centrally located in terms of access to services and facilities in Caldicot town centre, has good access to road links to the M4 and M48 motorways to access outside employment markets, and is within reasonable distance of employment opportunities to the south of the town. Option M performs least well of the Options given its poor access to Severnside centres, poor access to employment sites within Severnside, and limited potential to capitalise upon the strategic road network.

## ISA Theme: Population and communities

| Options             | Option J   | Option K       | Option L       | Option M       |
|---------------------|--|----------------|----------------|----------------|
| Rank                | 1  | 2              | 1              | 3              |
| Significant effect? | Yes - Positive   | Yes - Positive | Yes - Positive | Yes - Positive |
| Discussion          | <p>All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.</p> <p>All Options will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising</p> |                |                |                |

## ISA Theme: Population and communities

these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the south of the County. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway station immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.

In terms of integrating with existing communities/ settlements, Option L performs most positively as it would infill between Rogiet to the west and Caldicot to the east. Option J would also perform positively in this respect through extending Caldicot to the north east. However, while Options J and L have the potential to deliver positive effects in terms of promoting the growth of existing communities; Option L may also lead to the coalescence of Rogiet and Caldicot, with the potential for negative effects in terms of settlement/ community identity.

Option K performs less well given the Option is detached from Caldicot by the M48, and therefore would likely be isolated to some extent from the existing settlement to the south. Residents would likely be reliant on the car to access services and facilities in Caldicot and would perform less positively than Options J and L in terms of supporting sustainable communities. This is also likely to be the case through growth at Option M, however, this option is arguably least well performing as it is in a less sustainable location, north of the M4 corridor. Option M would however likely positively integrate with Caerwent; delivering positive effects to this settlement through infrastructure delivery and subsequent improved accessibility.

Overall, it is therefore considered that Option L, followed by Option J perform most positively in terms of enhancing the Severnside area, integrating with key settlements, and the opportunity to utilise opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option K, while adjacent to the M48/ M4 strategic transport network and in close proximity to Caldicot, performs less well as it is severed from the community by the motorway. Option M performs least well given its relative detachment from the M4 corridor and the main town of Caldicot; and subsequent reduced potential to deliver sustainable communities.

## ISA Theme: Health and wellbeing

| Options             | Option J   | Option K | Option L | Option M |
|---------------------|--|----------|----------|----------|
| Rank                | 2  | 2        | 1        | 3        |
| Significant effect? | No   | No       | No       | No       |
| <b>Discussion</b>   | <p>There are two GP surgeries located within the Severnside area within close proximity to the Options; Gray Hill Surgery and Portskewett Surgery. Options J, K and L are all within 1km / 20-minute walk of a GP practice, while Option M is 2.4 miles (drive) from Portskewett Surgery.</p> <p>In terms of wider health facilities, the Grange University Hospital, is located in Cwmbran, is approximately 24.7km from Options K and L, 24km from Option M, and 26.4km from Option J. Option M is worst performing in terms of access to a GP, while all Options perform on a par in terms of access to a hospital and wider health services.</p> <p>Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements which have functional transport links. The Severnside area, has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, providing access to Newport, Cardiff and Bristol. Railway stations at Rogiet and Caldicot connect with the key settlements of Cardiff in the west and Bristol/ Cheltenham/ Midlands in the east. Option L is best located in terms of access to Caldicot railway station and the Severn Tunnel Junction at Rogiet; being 0.5 miles/ 10-minute walking distance from the Caldicot station. Option K is 800m from Caldicot station, however this would involve crossing the M48. Option J is 1.1 mile / 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245m detached by the Country Park.</p> <p>While not sustainable transport options, it is worth noting that there are good road links from the Options to the M4 and M48 motorways; including the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the West, and Chepstow to the East. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south.</p> |          |          |          |

## ISA Theme: Health and wellbeing

Options located in close proximity to the motorway also have the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e., through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant.<sup>83</sup> Options L and K perform most negatively in this respect given their location adjacent to the motorway. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

Overall, Option L performs particularly well in terms of proximity to health services and supporting healthy forms of transport to reach health (and wider) services/ facilities /employment. Options J and K perform relatively on a par against this ISA theme, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from health facilities and sustainable travel opportunities in the key Severnside settlements (namely Caldicot).

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<sup>83</sup> <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>

## ISA Theme: Equalities, diversity and social inclusion

| Options             | Option J   | Option K | Option L | Option M |
|---------------------|--|----------|----------|----------|
| Rank                | 2  | 3        | 1        | 4        |
| Significant effect? | No   | No       | No       | No       |
| <b>Discussion</b>   | <p>Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. Positive effects are predicted for residents' quality of life, creating more positively integrated communities.</p> <p>In terms of the 2014 Welsh Index of Multiple Deprivation (WIMD) looking at Severnside area, and specifically the growth Options:</p> <ul style="list-style-type: none"> <li>• Option J is within the 80% - 100% least deprived LSOAs in Wales;</li> <li>• Option K is within the 60% - 80% least deprived LSOAs in Wales;</li> <li>• Option L is predominately within the 60% - 80% least deprived LSOAs in Wales. The east of the Option falls within the 20% - 40% most deprived LSOAs; and</li> <li>• Option M is within the 60% - 80% least deprived LSOAs in Wales.</li> </ul> <p>As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing; however, it is considered that by targeting the most deprived communities through Option L, positive effects are likely to be enhanced to some degree.</p> <p>Option J itself is the least deprived of the Options and will likely deliver increased positive effects through reducing inequalities between sub-urban and urban areas; expanding upon Portskewett village located to the east of Caldicot.</p> <p>Options that are well located in terms of sustainable settlements also perform positively through ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, and especially those without access to private vehicles. Option L is best performing in this respect given its location nestled between two</p> |          |          |          |

|  |   |
|--|---|
|  | <p>existing communities that are well supported in terms of infrastructure provision and sustainable travel opportunities. Options J and K also perform positively in this respect; however, it is noted that Option J is slightly detached from the main centre, and Option K is detached from existing communities by the M48. Option M performs least positively given it is not well connected with sustainable centres, services and facilities.</p> <p>Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, positive effects are likely to be less significant through Option M, given its comparative detachment from the Severnside area. Option L is predicted to lead to positive effects of greatest significance through targeting deprived areas to the east of the Option. This will promote equality, developing more inclusive communities in a sustainable location.</p> |
|--|---|

### ISA Theme: Transport and movement

| Options             | Option J  | Option K | Option L | Option M |
|---------------------|---|----------|----------|----------|
| Rank                | 2   | 2        | 1        | 3        |
| Significant effect? | No  | No       | No       | No       |
| Discussion          | <p>In terms of the strategic transport network, the Severnside area has an important role as the gateway to Wales on the M4, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with Newport to the West, and Chepstow to the East. Levels of self-containment throughout the Severnside area are very low, holding the characteristics of a 'dormitory' area with high amounts of out-commuting and reliance on the car as the primary mode of travel. There are however, more recently, significant employment bases present at Magor, Undy, Rogiet and Portskewett; increasing traffic levels throughout the settlements and across the M4 corridor. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 to the west of Magor Undy. Option M is the least well connected given its distance, comparatively, from the M4 corridor.</p> <p>Given the location of all Options to the south of the County, it is considered that development under all Options is likely to result in increased vehicular use throughout the Severnside area, with the potential for long term negative effects. However, it is noted that all Options will deliver long term positive effects through capitalising upon the recent removal of the Severn</p> |          |          |          |



## ISA Theme: Transport and movement

Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic transport links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County.

Access to sustainable transport throughout the Severnside area is good. Caldicot and Rogiet (at Severn Tunnel Junction station) have rail links to Newport and Cardiff to the west and Bristol/ Cheltenham/Midlands in the east. Option L is best located in terms of access to Caldicot station, being 0.5 miles/ 10-minute walking distance away. While Option K is within 800m of the station, this would involve crossing the M48, and is therefore not seen to be particularly accessible. Option J is 1.1 mile/ 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245 detached by the Country Park. Option L therefore performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within Caldicot and Rogiet, and for wider commuter journeys.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform well against this ISA theme, directing growth towards the south of the County and more specifically around the M4 corridor, capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot and Rogiet) and the wider M4 corridor.

| ISA Theme: Natural resources (air, land, minerals and water) |  |                |                |                |
|--|--|----------------|----------------|----------------|
| Options  | Option J   | Option K       | Option L       | Option M       |
| Rank   | 2  | 2              | 1              | 2              |
| Significant effect?  | Yes - Negative   | Yes - Negative | Yes - Negative | Yes - Negative |
| Discussion   | <p>While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option L is best performing in this respect, given its sustainable location nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure (such as the Severn Tunnel Junction station) and encourage modal shift. Option M performs least positively given it is detached from sustainable transport along the M4 corridor and within/ surrounding Caldicot, with high reliance on the car for travel anticipated.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).<sup>84</sup> The area of all Options is predominately Grade 1 agricultural land. The exception to this is approximately 1/3 of Option K which is Grade 3b land; and Option L includes areas of Grade 2, Grade 3b and Grade 4 land to the north east of the Option. Options L and K are therefore best performing in this respect as they would necessitate the least amount of loss of BMV land.</p> <p>All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Options L and K perform better than Options J and M in relation to protecting the County's soil/ and resource.</p> |                |                |                |

<sup>84</sup> The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

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

Monmouthshire's mineral resource is focused to the south of the County, with part of Option M and Option K falling within a limestone minerals safeguarding area. Options J and L are therefore best performing in terms of protecting the County's mineral resource; however, in accordance with national and regional policy requirements, it is considered that a sustainable approach will be adopted to development within mineral safeguarding areas.

All Options are considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options perform negatively against this ISA theme given development at each option would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing given it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage; and is not located within a minerals safeguarding area. It is difficult to differentiate between all other Options at this stage.

### ISA Theme: Biodiversity and geodiversity

| Options             | Option J   | Option K  | Option L  | Option M  |
|---------------------|--|-----------|-----------|-----------|
| Rank                | 3  | 2         | 3         | 1         |
| Significant effect? | Uncertain  | Uncertain | Uncertain | Uncertain |
| Discussion          | <p>In terms of European sites, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA)/ Ramsar site are located 900m south of Option L, 1.2km south of Option J, and over 2km from Options K and M. The Severn Estuary is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.</p> <ul style="list-style-type: none"> <li>Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl.</li> </ul> |           |           |           |

## ISA Theme: Biodiversity and geodiversity

- Primary reasons for Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity.
- This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.

HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Severn Estuary SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow; and for development to affect the SPA/ Ramsar site through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow. As such, the Severn Estuary, and potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SAC/ SPA/ Ramsar site. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. However, given the distance of the Options to the SPA/ SAC/ Ramsar site; it is considered that only Options L and J have the potential to lead to significant effects.

There is a range of nationally and locally designated biodiversity located around the Severnside area. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the Severn Estuary SSSI through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow.

Options J and K are constrained by Ancient Woodland at Farthing Hill (adjacent to Option J) and Woodland Valley (to the north east of Option K). There is the potential for development at Options J and K to adversely impact upon biodiversity present at Farthing Hill and Woodland Valley through increased disturbance, noise, light and air pollution. There is also the potential to deliver positive effects through biodiversity net-gain, this may include creating ecological corridors and aiding connectivity between sites.

## ISA Theme: Biodiversity and geodiversity

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, Option K includes scattered pockets of hedges/ dense scrub and linear tree/ hedgerow habitats. It is noted that Dewston Garden and Grottoes Park is located adjacent to the site to the west, which is rich in biodiversity and may hold connectivity with biodiversity present within the Option. In terms of Option M, mature trees/ hedgerows densely line the site boundary to the south along the A48, and there is a patch of woodland to the east of the site further along the A48 extending north. Option L also has hedgerows lining the field parcels within the Option, and there are sparse mature trees present throughout Option J. There is the potential for development across the Options to lead to negative effects on biodiversity through direct loss of habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain. Notably Options have the potential to strengthen connectivity across the Options and with the wider biodiversity network.

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

| ISA Theme: Historic environment |   |           |           |           |
|---------------------------------|---|-----------|-----------|-----------|
| Options                         | Option J  | Option K  | Option L  | Option M  |
| Rank                            | 3   | 2         | 1         | 2         |
| Significant effect?             | Uncertain   | Uncertain | Uncertain | Uncertain |
| Discussion                      | <p>There are no designated heritage assets within Option M; however, it is in close proximity to the Caerwent Conservation Area, Caerwent Roman City Scheduled Monument and a number of listed buildings. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area. However, this is uncertain at this stage. The Option is separated from the heritage assets by the A48 and is also adjacent to existing residential development, which should help to reduce impacts as a result of development in this area.</p>  |           |           |           |
|                                 | <p>Development at Option K would extend the settlement of Caldicot to the North West, which would cross the boundary of the M48 motorway and encroach upon designated heritage settings in Caerwent, including the Caerwent Conservation Area. The Dewstow House Historic Park and Garden, which contains four listed buildings is located adjacent to the growth area in the south-west and development here has the potential to directly affect its setting, particularly though loss of greenfield land which is likely to contribute to the character of this area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area and Dewstow House Park. However, this is uncertain at this stage.</p> |           |           |           |
|                                 | <p>Development at Option J would likely lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. Development within this growth area would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. On this basis, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified; however, there is some uncertainty at this stage.</p>  |           |           |           |

## ISA Theme: Historic environment

There are no designated heritage assets within Option L, which is also largely contained by the M48 in the north, railway line in the south and existing urban areas in the east and west. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

In summary, Option L is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. Whilst uncertainties exist, Option J is considered to have greater potential for significant residual negative effects. It is not possible to identify any significant differences between Options K and M at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

| ISA Theme: Landscape |   |                |           |           |
|----------------------|---|----------------|-----------|-----------|
| Options              | Option J  | Option K       | Option L  | Option M  |
| Rank                 | 3   | 3              | 2         | 1         |
| Significant effect?  | Yes - Negative  | Yes - Negative | Uncertain | Uncertain |
| Discussion           | <p>As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at the Severnside area, while the area is not constrained by international or national landscape designations, it is noted that the west of Caldicot is separated by an important Green Wedge from Rogiet. This Green Wedge covers Option L, and it is therefore considered that development at this location could lead to coalescence between these two settlements; affecting the degree of physical and visual separation, as well as the visual impact upon the surrounding landscape.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>85</sup></p> <p>Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Caldicot and Magor &amp; Undy, as higher tier settlements within the Severnside area. However, looking specifically at the Options in turn:</p> <ul style="list-style-type: none"> <li>• <b>Option J</b> is categorised as having a high-medium sensitivity to residential development.</li> <li>• <b>Option K</b> is categorised as having a high-medium sensitivity to residential development.</li> <li>• <b>Option L</b> is categorised as having a medium sensitivity to residential development.</li> <li>• <b>Option M</b> is categorised as having a medium-low sensitivity to residential development.</li> </ul> <p>Development of Option M would likely extend the settlement of Caerwent to the east, north of the A48. Development would significantly increase the size of Caerwent, altering the character of the settlement and village identity, and may set precedent for further growth to the east, along the A48.</p> |                |           |           |



|  |  |
|--|--|
|  | <p>Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the character and setting of the settlement and wider landscape, depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity and Capacity Study (2009) findings. Option J and Option K are identified as worst performing of the Options, given both have medium-high sensitivity to housing development. Option K would likely lead to negative effects through extending development northwest of the M48 into the open landscape, which currently acts as a physical barrier to development. Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L performs more strongly than Options J and K as it is considered to have medium sensitivity to residential development. However, development of Option L could lead to coalescence between Caldicot and Rogiet, which may result in the loss of a multi-functional open space and designated 'Green Wedge'. Option M may also set precedent for further development in the open landscape to the east along the A48, however is of medium-low sensitivity to development, and therefore is best performing of the options.</p> <p>It is noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.</p> |
|--|--|

### ISA Theme: Climate change

| Options             | Option J   | Option K  | Option L  | Option M  |
|---------------------|--|-----------|-----------|-----------|
| Rank                | 1  | 1         | 3         | 2         |
| Significant effect? | Uncertain  | Uncertain | Uncertain | Uncertain |
| Discussion          | Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a |           |           |           |

<sup>85</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

## ISA Theme: Climate change

climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure. However, it is noted that Option L is an area of open green space, defined as a 'green-wedge'. The loss of this area of green infrastructure has the potential to lead to negative effects in terms of climate change adaptation.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards the South of the County; capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro, as discussed above. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet with good access to the town centre, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option L performing least positively. This is given that in comparison to other Options, Option L is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot) and the wider M4 corridor. It is however noted that the utilisation of the M4 itself will result in continued high car use in the County.

In terms of managing flood risk to address climate change, it is recognised that the Severn Estuary is located along the south of the County. While the majority of Options are not constrained in this respect, the southern extent of Option L is located within Flood Zones B and C. It is however noted that development of Option L could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

## ISA Theme: Climate change

Overall, development proposed at the individual Growth Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, capitalising upon strategic transport links to the south of the County; however, it is noted that the utilisation of the M4 corridor will result in continued high car use. As such, effects on climate change in this respect are uncertain. While Option L is best performing in terms of access to sustainable travel, Option L performs poorly due to high risk of flooding, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15. Option M also performs less well than other Options given its detachment from sustainable transport opportunities surrounding Caldicot and Rogiet, and subsequent likely reliance on the private vehicle for travel.

## Summary findings and conclusions for spatial strategy options

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

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

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

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

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

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

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

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

# Appendix C Appraisal of Preferred Strategic Site Allocations

## Introduction

In order to implement the RLDP's Strategy, three Preferred Strategic Site Allocations have been identified for the Primary Settlements of Abergavenny, Chepstow and Caldicot.

Following the consultation on the Preferred Strategy the Council will undertake a detailed assessment of the Preferred Strategic Sites to ensure delivery of the Plan's Strategy. To further inform this assessment, this Appendix presents the ISA of each Preferred Strategic Site individually against the ISA framework, with consideration of proposed use, size, and level of growth (number of homes).

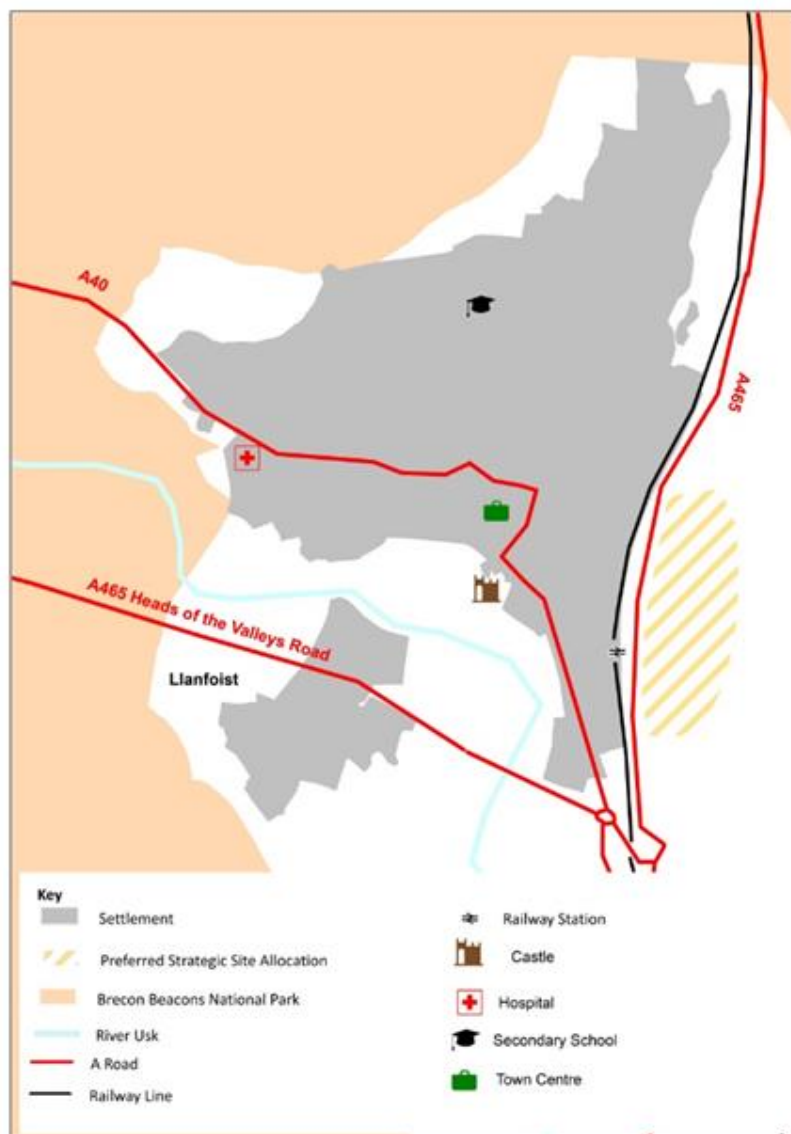
The assessment considers any potential effects that may arise as a result of development at these locations, including the key environmental constraints and opportunities present.

These sites are listed below and shown in **Figures AC.1- 3** which follow overleaf.

- a) Abergavenny East
- b) Bayfield, Chepstow
- c) Caldicot East

## Abergavenny East

As shown in **Figure AC.1**, Abergavenny East is located to the east of Abergavenny, to the east of the A465 and Abergavenny Train Station. The site is 24.75 hectares and is proposed for mixed use (residential, employment, retail, leisure, education and community use). The site will deliver approximately 500 homes over the plan period (635 homes were proposed in the candidate site submission).



**Figure AC.1 Abergavenny East**

Detailed appraisal findings are presented overleaf against the ISA objectives, with summary findings presented at the end of this Appendix.



| ISA Topic                    | Abergavenny East   | Significant<br>Effect? |
|------------------------------|--|------------------------|
| Economy<br>and<br>Employment | <p>Abergavenny plays a significant economic role in the county, being identified as a Primary Settlement in the RLDP settlement hierarchy. The Heads of the Valleys Road (A465), running south and east of Abergavenny, provides strategic links to Brecon, Mid Wales and the wider Cardiff Capital Region. Abergavenny East is disconnected from the town centre due to severance from the A465, which may hinder residents' access to employment sites within the town centre. However, while details regarding supporting infrastructure are absent at this stage, it is considered that provision of access across the A465 will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>It is also recognised that the site is proposed for mixed use, including employment use, and will therefore support a level of self-containment, with access to jobs on site. Furthermore, the delivery of employment provision, alongside new homes and supporting infrastructure, will likely encourage inward investment and support local economic growth. This has the potential to lead to positive effects against this ISA topic, however a level of uncertainty is noted at this stage in the absence of specific detail regarding size and type of provision. Abergavenny is one of the most self-sufficient settlements in terms of employment, with a variety of employment sites within the town; a number of which are protected employment sites. The largest protected employment sites are at Union Road and Hatherleigh Place, located to the west of the town centre, and Mill Street, located to the south of the town centre. Whilst Mill Street is in close proximity to Abergavenny East, residents will need to cross both the A465 and the A40 to access this employment site and would therefore likely be reliant on the car. However, as set out above, it is considered that suitable pedestrian access will be provided alongside development, enabling residents to access both the nearest bus stop and nearby employment opportunities. Moreover, this part of the A40 is more residential with some crossings already in place. As such, development of the site will likely lead to significant long term positive effects in terms of providing good access to local employment sites, further supporting self-containment.</p> <p>Abergavenny East performs positively in terms of providing access to Abergavenny train station, which is located 0.8km from the site, or a 10-minute walk using an existing route along Station Road, on the other side of the A465. The train station connects residents with larger employment sites further</p> | Yes – positive         |

| ISA Topic                        | Abergavenny East  | Significant<br>Effect? |
|----------------------------------|---|------------------------|
|                                  | <p>afield, including those in Newport (25-minutes), Hereford (25-minutes), Cardiff (40-minutes), Bristol (1 hour and 10-minutes) and Birmingham (2 hours). However, it is noted that Abergavenny East is separated from the train station by the A465 and therefore access to the train station would rely on the creation of suitable pedestrian access across this road. It is recognised that a detailed assessment of the site following the consultation of the Preferred Strategy will determine necessary supporting infrastructure.</p> <p>Overall, Abergavenny East is anticipated to lead to significant long-term positive effects, against this ISA topic. The site performs well in terms of its delivery of employment land alongside housing, and proximity to both local employment sites within Abergavenny, and employment centres further afield, accessible via Abergavenny Train Station. While positive effects are dependent to some extent on the delivery of suitable pedestrian access across the A465 alongside development, it is considered that this will be committed to at the Deposit stage.</p>   |                        |
| Population<br>and<br>Communities | <p>Abergavenny East performs well in terms of providing sufficient housing to meet the identified housing need of the community, delivering 500 homes within the plan period, and 145 homes in the next plan-period. Significant long-term positive effects are therefore predicted in this respect.</p> <p>Notably, house prices vary significantly between the different areas of Abergavenny town. Whilst some areas are amongst the most expensive in Monmouthshire, Cantref, located to the northeast of the town centre, is relatively deprived<sup>86</sup>. According to the Welsh Index of Multiple Deprivation (2019), Abergavenny East is located in Llanover, and whilst this area is not as deprived as Cantref, it remains deprived and therefore strategic development will contribute towards sustainable growth, supported by the necessary infrastructure and employment, leading to increased vitality in this part of Abergavenny.</p> <p>As mentioned under the economy and employment ISA topic, Abergavenny East is disconnected from the main settlement of Abergavenny due to severance from the A465. This may reduce accessibility to services and facilities in the town centre and may also make it difficult for residents to integrate with existing communities on the other side of the main road. However, while details regarding supporting</p> | Yes – positive         |

<sup>86</sup> Monmouthshire County Council (2020): 'Local Housing Market Assessment', [online] available to access via [this link](#)

| ISA Topic            | Abergavenny East   | Significant<br>Effect? |
|----------------------|--|------------------------|
|                      | <p>infrastructure are absent at this stage, it is considered that provision of access across the A465 will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP. Furthermore, it is recognised that the delivery of 500 new homes including supporting infrastructure and employment will deliver a well contained community in itself, supporting neighbourhood satisfaction to the east of the town. This will contribute towards the services and facilities already available in Abergavenny; notably, the town centre has a relatively large number and range of shops and restaurants, a theatre, cinema, and museum, and is a vibrant focus for the surrounding area.</p> <p>Overall, Abergavenny East performs well against this ISA topic and is considered likely to lead to significant long-term positive effects. While there is a level of uncertainty surrounding connectivity with the main town centre, it is considered that this will likely be committed to at the Deposit Stage.</p>   |                        |
| Health and Wellbeing | <p>Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny, which has a minor injury unit. . Abergavenny East is approximately 4.8km from this hospital, or a 7-minute drive by car, and is therefore in relatively good proximity to the hospital. Regarding GP surgeries, there are three in Abergavenny, all located close to the town centre. Abergavenny East is approximately 2.1km from Hereford Road Surgery, or a 24-minute walk. However, it is worth noting that the delivery of suitable pedestrian access across the A465 will likely significantly shorten this walk. It is considered that this will be committed to at the Deposit Stage.</p> <p>Access to sustainable transport in Abergavenny is relatively good and includes a train station, eleven bus services and an extensive Public Right of Way (PRoW) network. Whilst Abergavenny East is located close to Abergavenny Train Station, suitable pedestrian access across the A465 is needed to allow residents to easily access this amenity. Moreover, the nearest bus stop is a 12-minute walk from the site, although it is worth noting that the delivery of suitable pedestrian access across the A465 will significantly shorten this walk. In addition to this, there is potential for provision of a bus service into the site. As above, it is considered that this will be committed to at the Deposit Stage.</p> <p>Abergavenny's proximity to the Brecon Beacons National Park makes walking, cycling and other outdoor activities readily accessible to residents, supporting active travel and therefore health and</p> | Yes – positive         |

| ISA Topic   | Abergavenny East  | Significant<br>Effect? |
|---|---|------------------------|
|   | <p>wellbeing. The open countryside around the town includes an extensive PRoW network, and the Beacons Way walk starts at Abergavenny Train Station, in close proximity to Abergavenny East. However, suitable pedestrian access across the A465 will allow residents to easily access this walk. As above, it is considered that this will be committed to at the Deposit Stage. Nevertheless, Abergavenny East has good access to the open countryside immediately to the east of the site, and is located close to Ysgyryd Fach, a scenic point surrounded by woodland.</p> <p>Notably, it is recognised that the delivery of 500 new homes, including supporting infrastructure and employment, will deliver a well contained community in itself, supporting neighbourhood satisfaction to the east of the town.</p> <p>Overall, Abergavenny East performs well against the health and wellbeing ISA topic and is considered likely to lead to significant long-term positive effects. Whilst positive effects are dependent to some extent on the delivery of suitable pedestrian access across the A465 alongside development, it is considered that this provision will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p>  |                        |
| <p>Equalities,<br/>Diversity<br/>and Social<br/>Inclusion</p> | <p>Abergavenny is defined as a Tier 1 settlement, and therefore, expanding upon its built form through Abergavenny East will lead to long-term positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the county, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in Monmouthshire. It is predicted that growth around Abergavenny will lead to positive effects on new and existing residents' quality of life, supporting increased vitality and creating more integrated communities. However, it is noted that Abergavenny East is separated from the main settlement by the A465, which may hinder integration of the site with existing communities on the other side of the road. While it is recognised that pedestrian access is likely to be delivered across the A465, the road would nonetheless still represent a physical barrier.</p> <p>According to the Welsh Index of Multiple Deprivation (2019), Abergavenny East is within Llanover 2, which is one of the 30-50% most deprived LSOAs in Wales when looking at overall deprivation. The site ranks particularly poorly when looking at the access to services and housing domains in isolation.</p> | <p>Yes – positive</p>  |

| ISA Topic                    | Abergavenny East  | Significant<br>Effect? |
|------------------------------|---|------------------------|
|                              | <p>In this respect, development of the site has potential to improve the vitality of the area by new homes, including affordable homes, alongside employment, retail, leisure, education and community uses and associated infrastructure. Considering this, long-term positive effects are anticipated as Abergavenny East will support equal communities with improved access to services and facilities and affordable housing.</p> <p>Abergavenny East is approximately 1.1km, or a 16-minute walk into Abergavenny town centre, and therefore most residents are likely to rely on the private car in terms of accessing the services and facilities available in the town centre. In this respect, those without access to a car, particularly more vulnerable or immobile groups including the elderly, young families and those with disabilities affecting mobility, may feel cut off from the town centre. Whilst the anticipated delivery of pedestrian access across the A465 will significantly shorten the walk from the site into the town centre, some residents may still be reliant on buses, and the nearest bus stop is a 12-minute walk from the site. However, it is noted that infrastructure delivery alongside development could include the provision of a bus stop on the site, although uncertainty is noted at this stage.</p> <p>Notably, it is recognised that the delivery of 500 new homes, including supporting infrastructure and employment, will deliver a well contained community in itself, supporting neighbourhood satisfaction to the east of the town.</p> <p>Overall, Abergavenny East performs positively against this ISA topic and is considered likely to lead to significant long-term positive effects. Whilst positive effects are dependent to some extent on the delivery of supporting infrastructure i.e. suitable pedestrian access across the A465 alongside development and a bus stop, it is considered that this will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> |                        |
| Transport<br>and<br>Movement | <p>In terms of the strategic transport network, Abergavenny is situated along the A465, with links to Brecon, Mid Wales and the wider Cardiff Capital Region. Whilst levels of self-containment are high in Abergavenny, there remains a reliance on the car as the primary mode of transport, and therefore traffic throughout the town is a significant issue. In addition to this, a high percentage of the overall travel to work flows for the county are to Abergavenny. Whilst Abergavenny East is well located in</p>   | No                     |

| ISA Topic            | Abergavenny East  | Significant<br>Effect? |
|----------------------|---|------------------------|
|                      | <p>terms of access to the strategic transport network (located adjacent to the A465 and in very close proximity to Abergavenny Train Station), it is considered that development is likely to result in increased car use in the town with the potential for long term adverse effects. However, it is noted that the delivery of suitable pedestrian access across the A465, in combination with the provision of a bus stop at Abergavenny East, may mitigate this to some degree.</p> <p>Access to sustainable transport in Abergavenny is relatively good and includes a train station, eleven bus services and an extensive Public Right of Way (PRoW) network. Abergavenny East is located close to Abergavenny Train Station, and suitable pedestrian access across the A465 will allow residents to easily access this amenity. Whilst details regarding supporting infrastructure are absent at this stage, it is considered that provision of access across the A465 will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP. Moreover, the nearest bus stop is a 12-minute walk from the site, although it is worth noting that the delivery of suitable pedestrian access across the A465 will significantly shorten this walk. It is also noted that infrastructure delivery alongside development may include the provision of a bus stop, although as set out above, uncertainty is noted at this stage. In this respect, Abergavenny East has potential to result in a modal shift towards more sustainable forms of transport, with positive subsequent effects for air quality, health and wellbeing and climate change.</p> <p>Overall, Abergavenny East performs well against this ISA topic by directing growth towards a Tier 1 settlement with good access to the strategic transport network. Whilst development at this site may increase traffic through the town, it is recognised that, alongside the delivery of suitable pedestrian access across the A465, it has the potential to promote the uptake of active and public transport. However, it is noted that the proximity of the site to the A465 may also encourage car use. Ultimately, no significant effects, either positive or negative, are anticipated at this stage.</p> |                        |
| Natural<br>Resources | <p>Whilst air pollution is not a major problem in Monmouthshire, it is still recognised that it can cause significant problems for people's health. Poor air quality in the county is largely linked to vehicular emissions, particularly NO<sub>2</sub>. Whilst Abergavenny East is located near Abergavenny Train Station, and relatively near the town centre, walkability is dependent on the delivery of suitable pedestrian access across the A465. Whilst details regarding supporting infrastructure are absent at this stage, it is</p>  | <b>Yes – negative</b>  |

| ISA Topic           | Abergavenny East  | Significant<br>Effect? |
|---------------------|---|------------------------|
|                     | <p>considered that provision of access across the A465 will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Conversely, the site's proximity to the A465 may also result in an increase in private car use. In this respect, development of the site has potential to exacerbate air quality, with potential for long-term negative effects if suitable infrastructure is not delivered alongside development.</p> <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) and grades 3b to 5 are of poorer quality. A detailed agricultural land quality survey has been undertaken by the site promoter as part of the candidate site process, which found that the site is primarily (16.6ha) underlain by Grade 3b agricultural land, with smaller areas (3.6ha and 4.2ha) underlain by Grade 2 and Grade 3a agricultural land respectively. In this respect, development of the site will only partially result in the loss of BMV land. Nevertheless, Abergavenny East is a greenfield site, and will therefore result in the loss of greenfield land. However, it is worth noting that due to the lack of available brownfield land in Monmouthshire, this is largely unavoidable.</p> <p>Abergavenny East does not fall within, or within close proximity, to a mineral safeguarding area. The site is also considered unlikely to significantly impact demand for water or water quality as appropriate water resource management is likely to be a requirement for development.</p> <p>Overall, Abergavenny East performs poorly against this ISA topic given that development of the site has potential to exacerbate air quality and would result in the loss of significant BMV/ greenfield land. However, it is recognised that there are limited opportunities within Monmouthshire for development on lower grades of agricultural land/ brownfield land and therefore this is largely unavoidable to meet housing needs in the County Borough. Nevertheless, significant long-term negative effects are considered likely as a result of development at this site.</p> |                        |
| Biodiversity<br>and | <p>In terms of internationally designated sites the HRA screening assessment of the preferred strategic site allocation indicated that LSEs cannot be excluded and that it would be screened in for Appropriate Assessment (AA). Impact pathways for the site include: atmospheric pollution, recreational pressure,</p>  | <b>Uncertain</b>       |



| ISA Topic    | Abergavenny East  | Significant<br>Effect? |
|--------------|---|------------------------|
| Geodiversity | <p>loss of functionally linked land, water quality and water quantity, level and flow. The AA concluded that due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. the 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 conclusive AA at this stage. A level of uncertainty is therefore concluded at this stage, recognising that a full AA will be carried out at the deposit stage.</p> <p>There are a range of nationally and locally designated biodiversity sites around Abergavenny. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. As above, Abergavenny East has potential to impact the River Usk SSSI through recreation and water quality, quantity, level and flow.</p> <p>Abergavenny East is also constrained by ancient woodland, with a significant area coinciding with the Ysgyryd Fach scenic point to the east of the site. It is considered that the site has the potential to adversely affect this nationally important habitat and associated species through increased disturbance, noise, light and air pollution. However, the site also has potential to enhance this habitat and deliver significant positive effects. For example, the development could deliver biodiversity net gain, which could be achieved by creating ecological corridors between the site and the ancient woodland.</p> <p>Whilst Abergavenny East is not constrained by locally designated sites, it remains a greenfield site, and therefore may have the potential to hold biodiversity value. Notably, there are hedges/ mature trees along the field boundaries of the site, as well as its boundary with the A465. There is therefore potential for development to lead to negative effects on biodiversity through the direct loss of these habitats and associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national</p> |                        |



| ISA Topic               | Abergavenny East   | Significant<br>Effect? |
|-------------------------|--|------------------------|
|                         | <p>policy. It is considered that the strategic nature of the site presents an opportunity to exceed the mandatory requirement of 10% net-gain, with the potential for significant long-term positive effects.</p> <p>Overall, given the biodiversity constraints present, and the impact pathways identified through the HRA screening, it is considered that development has the potential to lead negative effects in relation to the biodiversity ISA theme. However, it is noted that there is the potential for Abergavenny East to deliver positive effects through biodiversity enhancement/ net gain. Uncertainty is concluded at this stage, reflecting the findings of the HRA AA. The AA found that without definite boundaries for the strategic site allocation, and only some policy wording, and the lack of key evidence (e.g. no air quality assessment), it was not possible to undertake a fully conclusive Appropriate Assessment at this stage. It is recognised that a fully conclusive HRA AA will be carried out at the Deposit stage which will further inform the ISA.</p>   |                        |
| Historic<br>Environment | <p>Abergavenny East is located to the east of the A465, and with the exception of some listed buildings near the train station, it is not near any designated heritage assets. However, as you move further away from the town/ the A465, elevation increases, and development is likely to become more visible from the main settlement and the World Heritage Site and National Park across the town. Moreover, in terms of the wider historic environment, Abergavenny East would extend the built-up area of Abergavenny beyond the A465, which partly defines the town edge to the east, separating the town from the countryside. Nevertheless, it is possible for the site to accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed, and the layout takes account of any important views into and from heritage assets within and beyond the settlement. Due to this, uncertainty is noted at this stage.</p> <p>In addition to the above, it is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. However, the strategic site is not considered likely to have a significant effect on the Welsh language.</p> | <b>Uncertain</b>       |
| Landscape               | <p>As a largely rural county, it is unsurprising that Monmouthshire has numerous valuable landscape features and is home to internationally and nationally designated landscapes. Focusing on Abergavenny, the built-up area to the north and west of the town is situated close to the Brecon</p>   | <b>Yes – negative</b>  |

| ISA Topic | Abergavenny East  | Significant<br>Effect? |
|-----------|---|------------------------|
|           | <p>Beacons National Park. Moreover, Llanfoist adjoins the Blaenavon World Heritage Site WH). In line with Planning Policy Wales (2018), it is recognised that these designated assets are “<i>valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced</i>”<sup>87</sup>. In addition to national policy requirements, protection is also provided to the National Park through the established Local Development Plan (2013) in place and development control functions in the correlating part of the county<sup>88</sup>. In terms of the World Heritage Site, the Blaenavon Management Plan (2018) identifies an overall vision and key principles for the management of the site<sup>89</sup>. In combination with sensitive design and appropriate site layout, it is possible for Abergavenny East to be developed without any significant residual negative effects. However, uncertainty is noted at this stage.</p> <p>It is also noted that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. However, Abergavenny East does not fall within, or adjacent to, any of these Landscapes of Outstanding or Special Historic Interest.</p> <p>A Landscape Capacity Update study has been carried out for Monmouthshire (2020) and identifies Local Landscape Character Areas, providing an overall analysis of the sensitivity of each to residential development<sup>90</sup>. Overall, the study found that there is capacity for housing in Monmouthshire focussing on the larger settlements, which includes Abergavenny. However, Abergavenny East is categorised as having a high/ medium landscape sensitivity to residential development.</p> <p>In respect of the above, it is considered that Abergavenny East has potential to negatively affect the intrinsic qualities, character and setting of the surrounding landscape due to its high/medium sensitivity, with the potential for significant long-term negative effects. However, it is noted that this is dependent on the site design/ layout. It is also noted that mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of any</p> |                        |

<sup>87</sup> Welsh Government (2021) Planning Policy Wales

<sup>88</sup> Brecon Beacons National Park Authority (2013) Brecon Beacons National Park Authority Local Development Plan

<sup>89</sup> Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018 - 2023

<sup>90</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

| ISA Topic         | Abergavenny East   | Significant<br>Effect? |
|-------------------|--|------------------------|
| Climate<br>Change | <p>potential negative effects. Uncertainty is therefore noted at this stage as potential effects will be dependent on site design/ layout and implementation of specific mitigation measures.</p> <p>Monmouthshire's rurality, in combination with its limited public transport network, high levels of car ownership and subsequent reliance on the private car, and high energy consumption, all contribute to the county's carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and therefore, Abergavenny East will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p> <p>In relation to the above, there is potential to reduce carbon emissions by reducing the need to travel and encouraging the use of sustainable modes of transport. The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Abergavenny East performs well in this respect, directing growth towards a Tier 1 settlement with good public transport, allowing residents to easily access services and facilities and employment opportunities on foot or by bike, bus or train. Abergavenny East is located near Abergavenny Train Station, and in relatively close proximity to Abergavenny town centre. However, suitable pedestrian access across the A465 is required for residents to access the train station/ town centre with ease. Whilst details regarding supporting infrastructure are absent at this stage, it is considered that provision of access across the A465 will be provided, with details included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>In terms of emissions related to the proposed development, Abergavenny East has the potential to capitalise upon opportunities to minimise both embodied and operational carbon emissions associated with development from the offset. In terms of embodied carbon, this includes the use of local/ sustainable building materials, and in terms of operational carbon, this includes the use of energy-saving measures such as insulation, double glazing and water recycling.</p> <p>In terms of climate change mitigation, whilst Abergavenny East has a very low risk of flooding from rivers and the sea, and a low risk of flooding from surface water, it could still support adaptation to the</p> | No                     |

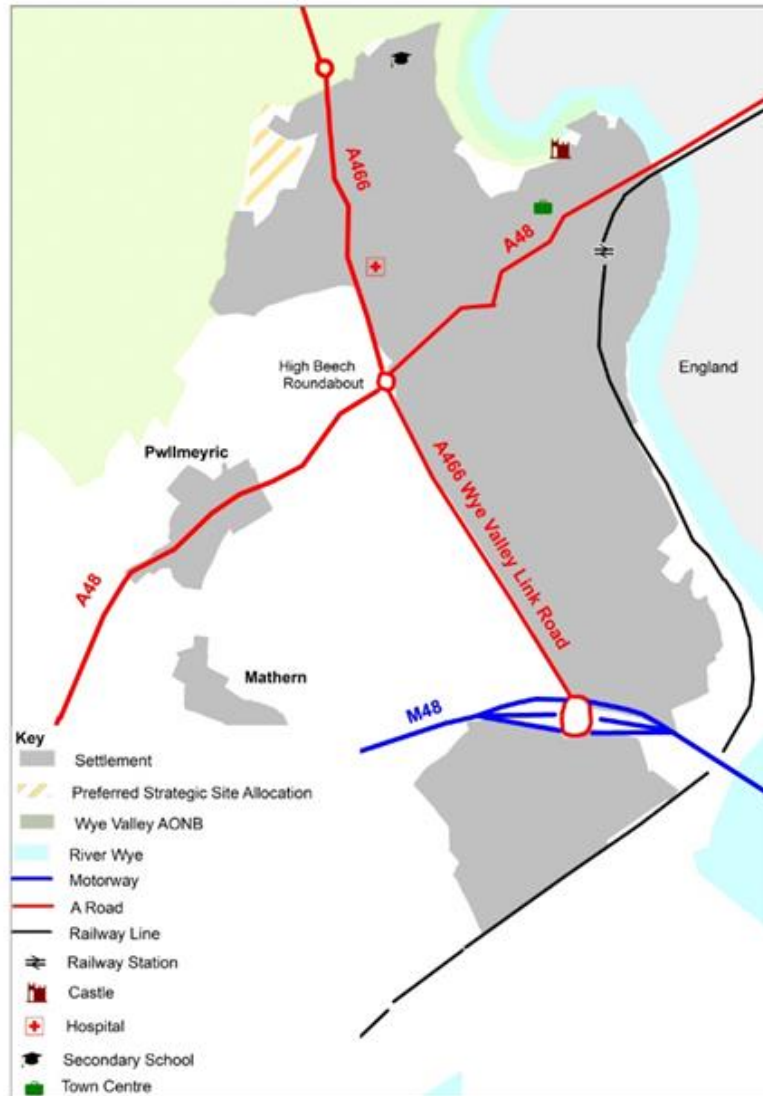
| ISA Topic | Abergavenny East | Significant<br>Effect? |
|-----------|------------------|------------------------|
|-----------|------------------|------------------------|

potential effects of climate change by utilising sustainable drainage systems (SuDS) and providing improvements to the local green infrastructure network.

Overall, the scale of development proposed at Abergavenny East is unlikely to have a significant effect on climate change when considered in isolation. Nevertheless, the site has potential to support the use of sustainable modes of transport, deliver energy/ water-saving measures, and reduce flood risk in the wider area.

## Bayfield, Chepstow

As shown in **Figure AC.2**, Bayfield, Chepstow is located to the northwest of Chepstow, bordering the Wye Valley Area of Outstanding Natural Beauty (AONB) to the northwest. The site is 10.07 hectares and is proposed for residential development. The site will deliver approximately 145 homes over the plan period (145 homes were proposed in the candidate site submission).



**Figure AC.2 Bayfield, Chepstow**

Detailed appraisal findings are presented overleaf against the ISA objectives, with summary findings presented at the end of this Appendix.

| ISA Topic                    | Bayfield, Chepstow  | Significant<br>Effect? |
|------------------------------|---|------------------------|
| Economy<br>and<br>Employment | <p data-bbox="360 300 1827 544">Chepstow plays a significant economic role in the county and is identified as a Primary Settlement in the RLDP settlement hierarchy. Of all of the settlements appraised in the Sustainable Settlement Appraisal (2022), Chepstow achieved the second highest weighted score, not far behind Abergavenny. Chepstow is well placed on the M4 corridor, at the entrance to Wales, to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England and their associated economic opportunities. Notably, these opportunities have been enhanced given the removal of the Severn Bridge Tolls.</p> <p data-bbox="360 580 1827 756">Chepstow is also one of the main focuses of employment within Monmouthshire. It has a good range of employment sites within the town, with the largest being the Newhouse Farm Industrial Estate located to the south of the town on the motorway junction with the M48. In terms of access to this employment site, Bayfield is not located in close proximity. Nevertheless, it still performs positively in terms of providing good access to local employment sites, supporting a degree of self-containment.</p> <p data-bbox="360 793 1827 1075">In terms of services and facilities, the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. Bayfield is approximately 1.3km, or a 15-minute walk, from the town centre, and whilst this will not be a walkable distance for all residents, Chepstow Community Hospital bus stop is approximately 800 metres, or a 11-minute walk, from the site. Nevertheless, a degree of reliance on the private car is likely in this respect. The same applies in terms of accessing the employment opportunities mentioned above, as Bayfield is approximately 1.8km from Chepstow Train Station, or a 21-minute walk, whilst it is only 0.5km from the A466, which connects to the M48/ M4.</p> <p data-bbox="360 1112 1827 1324">Notably, a high percentage of residents cross the River Severn daily to work in Bristol. As mentioned above, Bayfield is only 0.5km from the A466, which connects to the M48/ M4 and onto Bristol. In combination with the distance of the site from Chepstow Train Station, which is not easily accessible via bus, residents are likely to access employment opportunities in Bristol via private car, which will in turn lead to negative effects in relation to transport and movement, air quality, health and wellbeing, and climate change. However, it is noted that there is potential for infrastructure delivery alongside</p> | <b>No</b>              |

| ISA Topic                  | Bayfield, Chepstow  | Significant Effect? |
|----------------------------|---|---------------------|
|                            | <p>development to include the provision of a bus service into the site, which would likely increase the uptake of public transport to access employment opportunities.</p> <p>As Bayfield is proposed for residential use alone, it is unlikely to encourage inward investment and support local economic growth directly. However, by delivering growth and therefore an increase in the local workforce, development of the site will contribute towards the local/ wider economy, with potential for long-term positive effects.</p> <p>Overall, Bayfield is anticipated to lead to long-term positive effects, although not of significance, against this ISA topic. This reflects the focus of growth in Chepstow, which plays a significant economic role in the county. By facilitating growth, it also increases the local working population, supporting the local/ wider economy. However, it is noted that many employment opportunities, both within Chepstow and further afield, will likely be accessed by private car.</p>   |                     |
| Population and Communities | <p>Bayfield performs well in terms of providing sufficient housing to meet the identified housing needs of the community, delivering 145 homes within the plan period. Long-term significant positive effects are predicted in this respect.</p> <p>Notably, there are significant differences between areas of Chepstow as reflected by the range in house prices; St Kingsmark has the highest house prices whilst St Christopher has the lowest<sup>91</sup>. Bayfield is located in St Kingsmark ward, and in this respect, it will not contribute to growth and improved vitality in a part of the town where it is arguably not the most needed. Nevertheless, the site would extend the built-up area of Chepstow to the northwest, and development at this location would likely integrate well with the existing community. Bayfield is also likely to deliver new infrastructure alongside development, which will support the settlement and improve connections with the main town centre to the east. However, uncertainty is noted at this stage.</p> <p>Notably, Chepstow town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. As a relatively small development (145 homes), with</p> | Yes – positive      |

<sup>91</sup> Monmouthshire County Council (2020): 'Local Housing Market Assessment', [online] available to access via [this link](#)

| ISA Topic            | Bayfield, Chepstow   | Significant<br>Effect? |
|----------------------|--|------------------------|
|                      | <p>only residential use proposed, Bayfield will be able to capitalise on the services and facilities already on offer in the town.</p> <p>Overall, Bayfield performs positively in terms of supporting growth within Chepstow, an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands. In this respect, the site is considered likely to lead to long-term positive significant effects against this ISA topic.</p>  |                        |
| Health and Wellbeing | <p>Chepstow does not contain a hospital; however, it is supported by Chepstow Community Hospital which includes two GP practices; Mount Pleasant and Town Gate. Bayfield is approximately 1km on foot from Chepstow Community Hospital, which is located to the west of the main settlement, off the A466. In this respect, the site has good access to health services, with those less able bodied able to access the hospital in approximately 3 minutes via car. For wider hospital services (i.e. A&amp;E and minor injuries units), The Grange University Hospital in Cwmbran, which is the main hospital in the area, is approximately 34.4km from Chepstow. Other nearby hospitals include Southmead Hospital and the Royal Gwent Hospital, which are approximately 22.5km and 30.5km from Chepstow respectively.</p> <p>Access to sustainable transport in Chepstow is relatively good and includes a train station, 16 bus services and an extensive PRoW network. The open countryside around the town includes an extensive PRoW network, which is easily accessible to Bayfield to the northwest. Specifically, Bayfield is adjacent to public footpaths 373/75/1 and 355/16/1 along its western boundary, and 355/4/4 and 355/4/3 along its northern boundary. These footpaths connect the site to the B4235 and B4293 in the north, Mouton Road in the south, and the A466 (St Lawrence Road) to the east. At Mouton Road, the footpath connects to further footpaths, providing access to Great Barnets Woods and Bishop's Barnets Wood. In this respect, long-term positive effects are anticipated in terms of health and wellbeing.</p> <p>In terms of bus services, Bayfield is approximately 800 metres, or a 11-minute walk, from the Chepstow Community Hospital bus stop on the A466. This bus stop is served by the 63 (Chepstow – Usk – Pontypool – Cwmbran), 65 (Chepstow – Trellech – Monmouth), 69 (Chepstow – Tintern – Monmouth), and C2 (Chepstow Community Hospital – St Lawrence Park Estate – Chepstow Comprehensive School – Chepstow Bus Station) bus routes. Regarding the train station, Bayfield is located approximately 1.8km from Chepstow Train Station on foot, or a 21-minute walk, and approximately 3km via car,</p> | Yes – positive         |



| ISA Topic   | Bayfield, Chepstow   | Significant Effect?   |
|---|--|-----------------------|
|   | <p>representing a 7-minute drive. In this respect, residents are more likely to drive to access the train station. However, the C2 bus connects Bayfield to Chepstow Bus Station, which is approximately 650m, or a 10-minute walk, to the train station. It is also noted that there is potential for infrastructure delivery alongside development, which could include a bus service to the site.</p> <p>Overall, Bayfield performs positively against this ISA topic and long-term significant positive effects are anticipated as a result of development at this location. This is because the site provides residents with good access to health services, supports active travel and access to the open countryside, as well as the use of public transport.</p>   |                       |
| <p>Equalities, Diversity and Social Inclusion</p> | <p>Chepstow is defined as a Tier 1 settlement, and therefore, expanding upon its built form through Bayfield will lead to long-term positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the county, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in Monmouthshire. It is predicted that growth around Chepstow will lead to positive effects on new and existing residents' quality of life, supporting increased vitality and creating more integrated communities.</p> <p>According to the Welsh Index of Multiple Deprivation (2019), Bayfield is within St. Kingsmark 2, which is one of the 50% least deprived LSOAs in Wales when looking at overall deprivation. In this respect, development is not taking place in a part of the town that is more in need of growth due to higher levels of deprivation, such as Thornwell 1 in the south of the town, which is one of the 20-30% most deprived LSOAs in Wales. However, it is noted that this part of the town is relatively restricted in terms of growth due to the location of a river to the east, the M48 to the south, and the A466 to the west.</p> <p>Bayfield is approximately 1.3km, or a 15-minute walk, to Chepstow town centre, however Chepstow Community Hospital bus stop is approximately 800 metres, or a 11-minute walk, from the site. In this respect, most residents will be able to access the town centre by a sustainable mode of transport. Ultimately, directing growth to Bayfield will lead to positive effects in terms of improving access to</p> | <p>Yes – positive</p> |

| ISA Topic                    | Bayfield, Chepstow   | Significant<br>Effect? |
|------------------------------|--|------------------------|
|                              | <p>services and facilities for vulnerable or immobile groups in the community. The site also performs well by reducing inequalities between sub-urban and urban areas, by expanding upon Bayfield.</p> <p>Overall, Bayfield performs positively against this ISA topic and long-term significant positive effects are anticipated as a result of development at this location. This is because the site supports the growth of an existing community, with good access to services and facilities and employment opportunities. Bayfield will also support integration between urban and sub-urban communities, reducing inequality and supporting social inclusion.</p>   |                        |
| Transport<br>and<br>Movement | <p>In terms of the strategic transport network, Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England. Notably, these opportunities have been enhanced given the recent removal of the Severn Bridge Tolls.</p> <p>Access to sustainable transport in Chepstow is relatively good and includes a train station, 16 bus services and an extensive PRow network. The open countryside around the town includes an extensive PRow network, which is easily accessible to Bayfield to the northwest. Specifically, Bayfield is adjacent to public footpaths 373/75/1 and 355/16/1 along its western boundary, and 355/4/4 and 355/4/3 along its northern boundary. These footpaths connect the site to the B4235 and B4293 in the north, Mounton Road in the south, and the A466 (St Lawrence Road) to the east.</p> <p>In terms of bus services, Bayfield is approximately 800 metres, or a 11-minute walk, from the Chepstow Community Hospital bus stop on the A466. This bus stop is served by the 63 (Chepstow – Usk – Pontypool – Cwmbran), 65 (Chepstow – Trellech – Monmouth), 69 (Chepstow – Tintern – Monmouth), and C2 (Chepstow Community Hospital – St Lawrence Park Estate – Chepstow Comprehensive School – Chepstow Bus Station) bus routes. Regarding the train station, Bayfield is located approximately 1.8km from Chepstow Train Station on foot, or a 21-minute walk, and approximately 3km via car, representing a 7-minute drive. In this respect, residents are more likely to drive to access the train station. However, the C2 bus connects Bayfield to Chepstow Bus Station, which is approximately 650m, or a 10-minute walk, to the train station. Chepstow Train Station connects residents to Newport (18-minutes), Cardiff (30-minutes), Bristol (1 hour and 20-minutes), Birmingham (1 hour and 30-minutes)</p> | <b>No</b>              |

| ISA Topic            | Bayfield, Chepstow   | Significant<br>Effect? |
|----------------------|--|------------------------|
|                      | <p>and many other towns and cities. It is also noted that there is potential for infrastructure delivery alongside development, which could include a bus service to the site.</p> <p>Levels of self-containment are high in Chepstow, and there are substantial daily flows of commuters to and from the town centre, with a high reliance on the private car. The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). Residents travelling between Bayfield and the town centre/ train station will likely travel through this AQMA, with potential to exacerbate air quality if alternative sustainable modes of transport are not utilised. As the site is well located in terms of access to the strategic road network, due to its proximity to the A466, development has potential to result in increased vehicular use in the town with the potential for long-term adverse effects.</p> <p>Overall, Bayfield performs well against this ISA topic, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. Whilst development of the site may increase traffic through the town, leading to adverse effects on air quality, particularly at the Chepstow AQMA, it is recognised that the site performs positively in terms of promoting the use of sustainable modes of transport. No significant effects are anticipated in light of the above.</p> |                        |
| Natural<br>Resources | <p>Whilst air pollution is not a major problem in Monmouthshire, it is still recognised that it can cause significant problems for people's health. Poor air quality in the county is largely linked to vehicular emissions, particularly NO<sub>2</sub>. This is particularly apparent through the Air Quality Management Area (AQMA) present at Chepstow. Chepstow AQMA is located in the centre of the town, encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace. Chepstow AQMA was designated in 2007 due to high levels of NO<sub>2</sub>, predominately caused by vehicle emissions from through traffic in the town centre. Whilst Bayfield is located away from the AQMA, to the north west of the town, residents travelling between Bayfield and the town centre/ train station will likely travel through this AQMA, with potential to exacerbate air quality if alternative sustainable modes of transport are not utilised. Negative effects are therefore predicted in this respect.</p>   | Yes – negative         |

| ISA Topic                           | Bayfield, Chepstow  | Significant<br>Effect? |
|-------------------------------------|---|------------------------|
|                                     | <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) and grades 3b to 5 are of poorer quality. A detailed agricultural land quality survey has been undertaken by the site promoter as part of the candidate site process, which found that the site is largely a mix of grade 4 (11.6ha), grade 3b (7.7ha) and grade 3a (3.3ha) agricultural land.. Therefore, development will only result in the loss of a small area of BMV land. Nevertheless, Bayfield is a greenfield site, and will therefore result in the loss of greenfield land. However, it is worth noting that due to the lack of available brownfield land in Monmouthshire, this is largely unavoidable.</p> <p>Bayfield falls within a limestone mineral safeguarding area. The site is also considered unlikely to significantly impact demand for water or water quality as appropriate water resource management is likely to be a requirement for development.</p> <p>Overall, Bayfield performs negatively against this ISA topic given that development of the site has potential to exacerbate poor air quality at the Chepstow AQMA and would result in some loss of BMV/ greenfield land. However, it is recognised that there are limited opportunities within the Monmouthshire for development on lower grades of agricultural land/ brownfield land. Nevertheless, significant long-term negative effects are considered likely as a result of development.</p> |                        |
| Biodiversity<br>and<br>Geodiversity | <p>In terms of European sites, the Wye Valley Woodland SAC is located 600m east of Bayfield. The Wye Valley Woodland SAC is a large woodland SAC that straddles the Wales-England border, extending along the east of the county. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.</p> <p>Moreover, the River Wye SAC is located 800m east of the site. The River Wye SAC covers the length of the River Wye, to the north east of the county, extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive, which are the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined, the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well-established otter</p>   | <b>Uncertain</b>       |

| ISA Topic | Bayfield, Chepstow  | Significant<br>Effect? |
|-----------|---|------------------------|
|           | <p>population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.</p> <p>The HRA screening assessment (2022) of the preferred strategic site allocation indicated that LSEs cannot be excluded and that it would be screened in for Appropriate Assessment (AA). Impact pathways for the site include: atmospheric pollution, recreational pressure, loss of functionally linked land, water quality and water quantity, level and flow. The AA concluded that due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. the 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 conclusive AA at this stage. A level of uncertainty is therefore concluded at this stage, recognising that a full AA will be carried out at the deposit stage.</p> <p>There are a range of nationally and locally designated biodiversity sites around Chepstow. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. As above, Bayfield has potential to impact the River Wye SSSI through atmospheric pollution, recreation and water quality, water quantity, level and flow; and to impact the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.</p> <p>Bayfield is also constrained by ancient woodland, with Great Barnett Woods and Bishops Barnett Wood located approximately 100m northeast of the site. It is considered that the site has the potential to adversely affect this nationally important habitat and associated species through increased disturbance, noise, light and air pollution. However, the site also has potential to enhance this habitat and deliver significant positive effects. For example, the development could deliver biodiversity net gain, which could be achieved by creating ecological corridors between the site and the ancient woodland.</p> |                        |

| ISA Topic            | Bayfield, Chepstow  | Significant Effect? |
|----------------------|---|---------------------|
|                      | <p>Whilst Abergavenny East is not constrained by locally designated sites, it remains a greenfield site, and therefore may have the potential to hold biodiversity value. There is therefore potential for development to lead to negative effects on biodiversity through the direct loss of potential habitats and associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national policy.</p> <p>Overall, Bayfield has the potential to lead to adverse effects on biodiversity given the presence of the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and River Wye SAC/ SSSI to the east of the settlement. In terms of wider biodiversity effects, the site is located in proximity to ancient woodland, with the potential for residual indirect negative effects. Nevertheless, it is noted that there is the potential for Bayfield to deliver positive effects through biodiversity enhancement/ net gain. Therefore, uncertainty is noted at this stage, reflecting the findings of the HRA AA. The AA found that without definite boundaries for the strategic site allocation, and only some policy wording, and the lack of key evidence (e.g. no air quality assessment), it was not possible to undertake a fully conclusive Appropriate Assessment at this stage. It is recognised that a fully conclusive HRA AA will be carried out at the Deposit stage which will further inform the ISA.</p> |                     |
| Historic Environment | <p>Bayfield does not contain any designated heritage assets. However, Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west of the site. There is also a Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) situated to the north east of the site, across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure. It's possible that the site could accommodate development without any significant residual negative effects on the scheduled monument and wider historic environment as long it is sensitively designed. Nevertheless, uncertainty is noted at this stage.</p> <p>In addition to the above, it is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. However, the strategic site is not considered likely to have a significant effect on the Welsh language.</p>   | <b>Uncertain</b>    |

| ISA Topic | Bayfield, Chepstow  | Significant<br>Effect? |
|-----------|---|------------------------|
| Landscape | <p>As a largely rural county, it is unsurprising that Monmouthshire has numerous valuable landscape features and is home to internationally and nationally designated landscapes. Looking specifically at Chepstow, the area immediately north of the town lies within the Wye Valley Area of Outstanding National Beauty (AONB). Planning Policy Wales (2021) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be <i>“valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced”</i><sup>92</sup>. In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the AONB aim to <i>“Ensure all development within the AONB and its setting conserves and enhances the AONB”</i>. Whilst protection is provided at the higher level, it is nonetheless considered that Bayfield has the potential to adversely impact upon the AONB, its special landscape features, character and setting.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Bayfield does not fall within, or adjacent to, these Landscapes of Outstanding or Special Historic Interest.</p> <p>Notably, land to the west of the A466 is currently protected by a ‘Green Wedge’ policy to ensure the town’s physical separation from Pwllmeyric and Mathern. Bayfield does not fall within this Green Wedge, and therefore development of this site does not pose a risk to coalescence.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA’s sensitivity to residential development<sup>93</sup>. Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements, which includes Chepstow. However, Bayfield is categorised as being of medium landscape sensitivity to residential development.</p> | Yes – negative         |

<sup>92</sup> Welsh Government (2021) Planning Policy Wales

<sup>93</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study



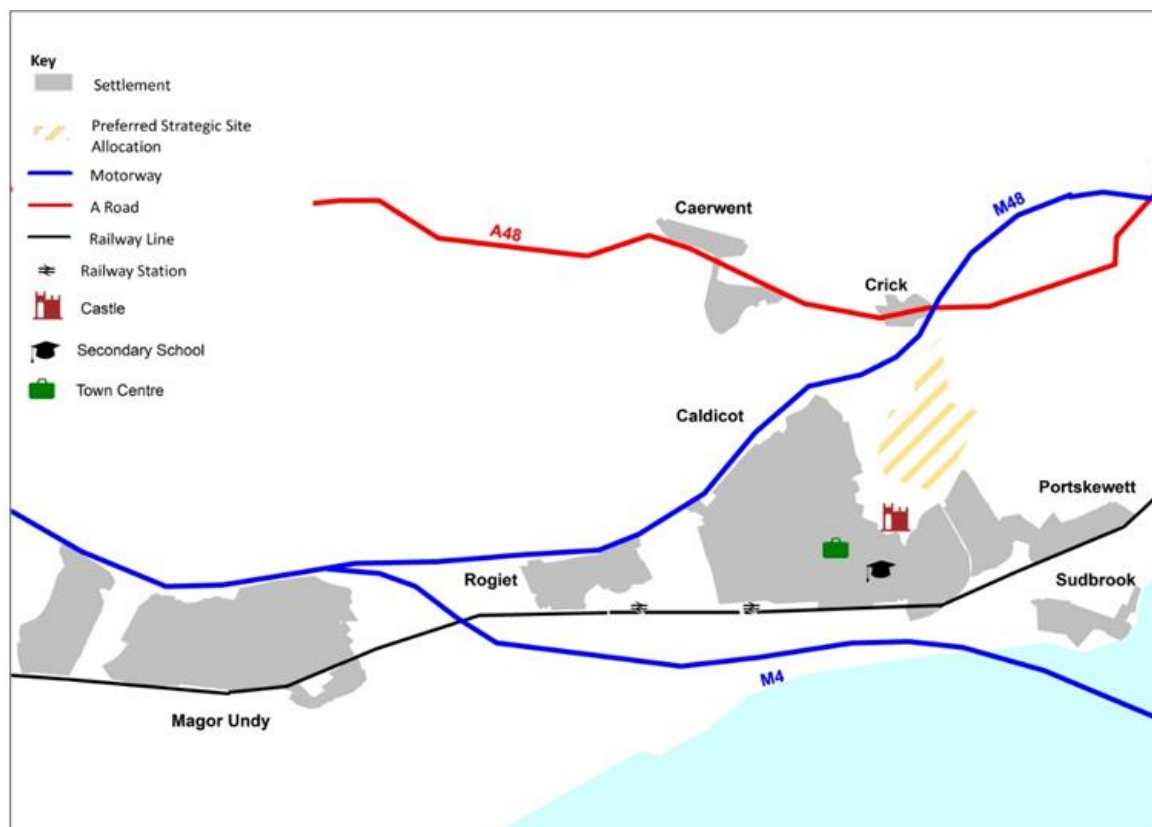
| ISA Topic         | Bayfield, Chepstow  | Significant<br>Effect? |
|-------------------|---|------------------------|
| Climate<br>Change | <p>Overall, Bayfield is particularly sensitive in terms of the landscape, with the potential for significant long-term negative effects. Depending on the design and layout of the development, the site could potentially affect the intrinsic qualities, character and setting of the AONB. However, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. Nevertheless, uncertainty is noted at this stage as potential effects will be dependent on site design/ layout and implementation of specific mitigation measures.</p>   | No                     |
|                   | <p>Monmouthshire's rurality, in combination with its limited public transport, high levels of car ownership and the subsequent reliance on the private car, and high energy consumption, all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such, Bayfield will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.</p>   |                        |
|                   | <p>There is the potential to reduce carbon emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Bayfield performs well in this respect, directing growth towards a Tier 1 settlement with good public transport links, connecting residents with employment and services within and outside the county.</p>  |                        |
|                   | <p>The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). Notably, residents travelling between Bayfield and the town centre/ Chepstow Train Station will likely travel through this AQMA, with potential to exacerbate air quality if alternative sustainable modes of transport are not utilised. Moreover, as the site is well located in terms of access to the strategic road network, due to its close proximity to the A466, development has potential to result in increased vehicular use in the town with the potential for long-term adverse effects.</p> |                        |
|                   | <p>In terms of emissions related to the proposed development, Abergavenny East has the potential to capitalise upon opportunities to minimise both embodied and operational carbon emissions associated with development from the offset. In terms of embodied carbon, this includes the use of local/</p>  |                        |



| ISA Topic | Bayfield, Chepstow  | Significant<br>Effect? |
|-----------|---|------------------------|
|           | <p>sustainable building materials, and in terms of operational carbon, this includes the use of energy-saving measures such as insulation, double glazing and water recycling.</p> <p>In terms of climate change mitigation, whilst Bayfield has a very low risk of flooding from rivers and the sea, and a very low risk of flooding from surface water, it could support adaptation to the potential effects of climate change by utilising sustainable drainage systems (SuDS) and providing improvements to the local green infrastructure network.</p> <p>Overall, the scale of development proposed at Bayfield is unlikely to have a significant effect on climate change when considered in isolation. Nevertheless, the site has potential to support the use of sustainable modes of transport, deliver energy/ water-saving measures, and reduce flood risk in the wider area.</p> |                        |

## Caldicot East

As shown in **Figure AC.3**, Caldicot East is located to the east of Caldicot, to the south of the M48 and north of the B4245. The site is 67.67 hectares and is proposed for mixed use (residential, employment, retail and leisure). The site will deliver approximately 925 homes over the plan period (1,460 homes were proposed in the candidate site submission).



**Figure AC.3 Caldicot East**

Detailed appraisal findings are presented overleaf against the ISA objectives, with summary findings presented at the end of this Appendix.

| ISA Topic                    | Caldicot East   | Significant<br>Effect? |
|------------------------------|---|------------------------|
| Economy<br>and<br>Employment | <p>According to the RLDP sustainable settlement hierarchy, Caldicot is classified as Primary Settlement, with functional transport links with the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Caldicot is located within the Severnside area, which has an important role as the ‘Gateway to Wales’, being located adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing and is well located to the nearby employment areas of Newport, Cardiff and Bristol. Caldicot Train Station connects the town to these employment areas. There are also good road links to the M4 and M48 motorways, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the west and Chepstow to the east. Caldicot East is located south of the M48 and A48 where they cross near Crick.</p> <p>Caldicot East is located south of the M48 and A48 and north of the B4245. Crick Road passes through the centre of the site and connects to the A48 in the north, connecting the site to A466 in Chepstow and beyond that the M48/ Severn Bridge. The site has reasonable access to the M4, via Rogiet to the west. Caldicot town centre is approximately 1.9km from the site, or a 22-minute walk, whilst Caldicot Train Station is approximately 2.7km from the site, or a 7-minute drive. In this respect, residents are likely to be reliant on the private car. A bus stop is not located near the site, however provision of a bus stop as part of the development would likely increase the uptake of public transport. Details regarding supporting infrastructure are absent at this stage, and therefore effects in this respect are uncertain. It is considered that further information will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Employment sites are present throughout the Severnside area. Severn Bridge Industrial Estate is located to the south east of Caldicot, which is a significant employment base and separates Caldicot from neighbouring Portskewett. Caldicot East is in proximity to this employment site, accessible via Crick Road and the B4245. There is also land allocated for employment to the North West of Magor/ Undy with the established Magor Brewery site and Wales One Business Park. However, these sites are relatively far away from Caldicot East, although they are still accessible via the M48/ M4 corridor.</p> <p>Notably, Caldicot East is proposed to include employment use, alongside new infrastructure, which will encourage inward investment and support local economic growth. Whilst the extent of employment land</p> | Yes – positive         |

| ISA Topic                        | Caldicot East   | Significant<br>Effect? |
|----------------------------------|---|------------------------|
|                                  | <p>to be delivered alongside housing is uncertain at this stage, positive effects are nonetheless anticipated in the long term.</p> <p>Overall, Caldicot East is anticipated to lead to significant positive effects against this ISA topic. This reflects the site's sustainable location with good access to the strategic road network and surrounding employment hubs, and the economic opportunities provided at the site through the delivery of strategic mixed-use development. While the extent of employment land delivery is uncertain, it is considered that the site will support self-containment to some extent, and also benefits from access to Severn Bridge Industrial Estate. While access to the services and facilities in Caldicot town centre and the train station is limited with no bus stop currently near the site, this has the potential to be delivered as supporting infrastructure alongside development. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p>  |                        |
| Population<br>and<br>Communities | <p>Caldicot East performs well in terms of providing sufficient housing to meet the identified housing need of the community, delivering 925 homes within the plan period, and a further 535 homes into the next plan period. Long-term significant positive effects are therefore predicted in this respect.</p> <p>Caldicot East will also lead to positive effects by capitalising upon the removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the south of Monmouthshire.</p> <p>Notably, Caldicot East will deliver significant growth in a relatively deprived part of Caldicot. Caldicot East is committed to including residential, employment, retail and leisure, which will transform this part of the community, leading to significant positive effects. In terms of integrating with existing communities/ settlements, Caldicot East performs positively by extending Caldicot to the north east. However, it is noted that Caldicot Castle and its surrounding grounds provides a degree of separation between the site and the main settlement. A degree of uncertainty is therefore noted at this stage, however supporting infrastructure could well seek to deliver connected neighbourhoods. As set out above, it is considered</p> | Yes – positive         |

| ISA Topic            | Caldicot East  | Significant<br>Effect? |
|----------------------|--|------------------------|
|                      | <p>that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Overall, Caldicot East performs positively against this ISA topic by providing sufficient housing to meet the identified housing need of the community, delivering strategic growth within the Severnside area and taking advantage of opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. The site also performs positively through delivering significant housing, employment and supporting infrastructure within a relatively deprived part of the community. In this respect, long-term significant positive effects are considered likely at this stage.</p>  |                        |
| Health and Wellbeing | <p>There are two GP surgeries within Caldicot/ Portskewett: Gray Hill Surgery and Portskewett Surgery. Caldicot East is approximately 1.6km, or a 19-minute walk, from Portskewett Surgery. Whilst this distance may be walkable for some residents, others will have to find alternative modes of transport to access this facility. For wider health facilities (i.e. A&amp;E and minor injuries units), The Grange University Hospital in Cwmbran, which is the main hospital in the area, is approximately 24.9km from Caldicot. Other nearby hospitals include the Royal Gwent Hospital, which is approximately 20.5km from Caldicot, or a 25-minute drive. It is also considered that health provision, such as a GP surgery, could be delivered alongside development at the site, given its strategic nature. However this is uncertain at this stage. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Whilst located away from the M4, the northern part of Caldicot East is approximately 100m from the M48, and the southern part of the site is approximately 80m from the B4245 (The Caldicot Bypass). In this respect, Caldicot East has the potential to perform negatively against this ISA topic as a result of potential impacts on residents' health as a result of air pollution. The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant. However, it is noted that the nature and significance of effects are uncertain at this stage, as they are dependent on both the delivery of supporting infrastructure, alongside the precise layout and design of the site. Both of which are uncertain at this stage.</p> | <b>Uncertain</b>       |

| ISA Topic   | Caldicot East  | Significant<br>Effect? |
|---|--|------------------------|
|   | <p>In terms of the Public Right of Way (PRoW) network, several public footpaths intersect with Caldicot East, including 376/25/1 and 354/48/1, which lead to with 376/9/2 and 376/9/1 to the south, connecting the site to Severn Bridge Industrial Estate. This is in addition to 376/26/1, 376/26/2, 354/80/1 and 354/79/1, which lead to 354/79/2 to the west, connecting the site to Church Road on the existing settlement edge of Caldicot. In this respect, Caldicot East is relatively well connected to the surrounding area via foot, with the open countryside also accessible via the wider PRoW network.</p> <p>Overall, Caldicot East performs relatively well in terms of its proximity to health services and access to the local PRoW network. However, due to potential negative impacts related to air quality, and without further details regarding supporting infrastructure and design/ layout of proposed development, uncertainty is noted at this stage.</p>   |                        |
| <p>Equalities,<br/>Diversity and<br/>Social<br/>Inclusion</p> | <p>Caldicot is classified as a Primary Settlement. Significantly expanding upon Caldicot's built form through the delivery of Caldicot East is likely to lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the county, focussing development in accordance with recent population growth data. Positive effects are predicted in relation to residents' quality of life, creating more positively integrated communities.</p> <p>In terms of the Welsh Index of Multiple Deprivation (019), Caldicot East falls within two LSOAs: Portskewett and Caldicot Castle 1, which are both amongst the 50% least deprived LSOAs in Wales. In this respect, development is not taking place in a part of the town that is more in need of growth due to higher levels of deprivation. However, Caldicot East will likely deliver increased positive effects through reducing inequalities between sub-urban and urban areas; expanding upon Portskewett village located to the east of Caldicot.</p> <p>Notably, development that is located in proximity to sustainable settlements tends to perform positively by ensuring easy access to services and facilities for more vulnerable or immobile groups in the community, particularly elderly residents, young families, those with disabilities, and those without access to a car. Whilst Caldicot East performs positively in this respect, it is noted that the site is slightly detached from the main settlement due to severance by Caldicot Castle. Nonetheless, it is recognised that 'employment, retail and leisure' is provided as part of the strategic site, and therefore a level of</p> | <p>Yes – positive</p>  |

| ISA Topic                    | Caldicot East  | Significant<br>Effect? |
|------------------------------|--|------------------------|
|                              | <p>services/ facilities is likely to be included to support the site. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Overall, Caldicot East is anticipated to lead to significant positive effects against this ISA topic by supporting the growth of and regeneration of existing communities, and improving access to housing, jobs and services.</p>   |                        |
| Transport<br>and<br>Movement | <p>In terms of the strategic transport network, the Severnside area has an important role as the gateway to Wales on the M4, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with Newport to the west, and Chepstow to the east. Levels of self-containment throughout the Severnside area are low, holding the characteristics of a 'dormitory' area with high amounts of out-commuting and reliance on the car as the primary mode of travel. It is however considered that the delivery of Caldicot East will contribute positively towards reducing out-commuting and increasing self-containment, delivering significant housing alongside employment, retail, and leisure provision. Effects in this respect are uncertain without specific site details. It is considered that this will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Furthermore, it is recognised that more recently there have been significant employment bases present at Magor, Undy, Rogiet and Portskewett, which will provide new residents with greater employment opportunities within the wider Severnside area.</p> <p>Given the location of Caldicot in the southern extent of Monmouthshire, it is considered that development under Caldicot East is likely to result in increased vehicular use throughout the Severnside area, with the potential for long-term negative effects. However, it is noted that the site will deliver long-term positive effects through capitalising upon the recent removal of the Severn Bridge Tolls, as well as the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. It is also considered that 'supporting infrastructure' is likely to relate to the transport network to some extent (including sustainable transport offer). It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP. Utilising existing strategic transport links, alongside potential new provision, will contribute positively towards</p> | <b>No</b>              |



| ISA Topic         | Caldicot East   | Significant<br>Effect? |
|-------------------|---|------------------------|
|                   | <p>delivering sustainable communities, achieving infrastructure improvements in the southern extent of the county.</p> <p>Access to sustainable transport throughout the Severnside area is good. Caldicot and Rogiet (at Severn Tunnel Junction station) have rail links to Newport and Cardiff to the west and Bristol/ Cheltenham/ the Midlands to the east. Caldicot Train Station is approximately 2.7km from the site, or a 33-minute walk and 7-minute drive. In this respect, residents are likely to be highly reliant on the private car. There is currently not a bus stop near the site, however provision of a bus stop may be included as part of the site's 'supporting infrastructure'. While this is uncertain at this stage, it is considered that its delivery would likely increase the uptake of public transport. More broadly it is noted that supporting infrastructure of Caldicot East could include enhancements/ improvements to bus, rail, walking and cycling services/ facilities/ networks. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p> <p>Specifically, in terms of the Public Right of Way (PRoW) network, several public footpaths intersect with Caldicot East, including 376/25/1 and 354/48/1, which lead to with 376/9/2 and 376/9/1 to the south, connecting the site to Severn Bridge Industrial Estate. This is in addition to 376/26/1, 376/26/2, 354/80/1 and 354/79/1, which lead to 354/79/2 to the west, connecting the site to Church Road on the existing settlement edge of Caldicot. In this respect, Caldicot East is relatively well connected to the surrounding area via foot, with the open countryside also accessible via the wider PRoW network.</p> <p>Overall, Caldicot East performs relatively well against this ISA topic, 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. However, as the site is currently not near a bus stop, and is relatively far away from the train station, effects of significance are not anticipated at this stage. There is the potential for significant positive effects if specific transport infrastructure improvements were provided, which may well be committed to at the Deposit Stage.</p> |                        |
| Natural Resources | <p>Whilst air pollution is not a major problem in Monmouthshire, it can cause significant problems for people's health. The greatest problems associated with air quality in the county are caused by vehicle</p>   | Yes – negative         |



| ISA Topic | Caldicot East   | Significant<br>Effect? |
|-----------|---|------------------------|
|           | <p>emissions, and therefore development performs positively where it seeks to utilise sustainable transport opportunities such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Caldicot East, whilst well served by the local PRoW network, is less well served by the public transport network, being relatively far away from Caldicot Train Station and with no bus stop nearby. However, due to the scale of the site, it is possible that a bus stop and rail improvements could be delivered alongside development, however uncertainty is noted at this stage. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP.</p>   |                        |
|           | <p>The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) and Grades 3b to 5 are of poorer quality. A detailed agricultural land quality survey has been undertaken by the site promoter as part of the candidate site process, however it only covers part of the site (Bradbury Farm) at this stage. The survey found that the majority of the site is underlain by grade 2 (34.7ha) agricultural land, with a smaller area underlain by grade 3b (1.3ha). Therefore, development of the site will result in the loss of BMV agricultural land. Moreover, Caldicot East is largely greenfield land, although the Showground part of the site is considered brownfield. Nevertheless, it is worth noting that brownfield sites are not extensive across the county, and therefore development of greenfield land is largely unavoidable.</p> |                        |
|           | <p>Monmouthshire's mineral resource is focused to the south of the county, however Caldicot East does not intersect with a mineral safeguarding area. Therefore, development of this site will protect the county's mineral resource. The site is also considered unlikely to significantly impact demand for water or water quality as appropriate water resource management is likely to be a requirement for development.</p>  |                        |
|           | <p>Overall, Caldicot East performs negatively against this ISA topic given that development of the site would result in the loss of BMV agricultural land/ greenfield land, although it is noted that it does contain a portion of brownfield land. It is also recognised that there are limited opportunities within the county for development on lower grades of agricultural land/ brownfield development</p>   |                        |

| ISA Topic                           | Caldicot East   | Significant<br>Effect? |
|-------------------------------------|---|------------------------|
| Biodiversity<br>and<br>Geodiversity | <p>In terms of European sites, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site is located approximately 1.3km south of Caldicot East. The Severn Estuary is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of Monmouthshire, and contains habitats listed under Annex I of the Habitats Directive, including estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive, including Sea lamprey, River lamprey and Twaite shad.</p> <p>A primary reason for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl. A primary reason for the Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range, creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity. The site is also designated due to its importance to the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.</p> <p>The HRA screening assessment (2022) of the preferred strategic site allocation indicated that LSEs cannot be excluded and that it would be screened in for Appropriate Assessment (AA). Impact pathways for the site include: atmospheric pollution, recreational pressure, loss of functionally linked land, water quality and water quantity, level and flow. The AA concluded that due to the relatively limited detail available in the RLDP Preferred Strategy (e.g. the 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 conclusive AA at this stage. A level of uncertainty is therefore concluded at this stage, recognising that a full AA will be carried out at the deposit stage.</p> <p>There are a range of nationally and locally designated biodiversity sites in and around the Severnside area. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites</p> | ?                      |

| ISA Topic | Caldicot East  | Significant<br>Effect? |
|-----------|--|------------------------|
|           | <p>are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. As discussed above, Caldicot East has the potential to impact on the Severn Estuary SSSI through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow.</p> <p>Caldicot East is also constrained by ancient woodland at Farthing Hill, which is adjacent to the site. Therefore, there is the potential for development of the site to adversely impact upon biodiversity present at Farthing Hill through increased disturbance, noise, light and air pollution. Nevertheless, there is also potential to deliver positive effects through biodiversity net gain; this may include creating ecological corridors and aiding connectivity between sites.</p> <p>Whilst Caldicot East is not constrained by locally designated sites, it is recognised that a large portion of the site is greenfield and therefore it has the potential to hold biodiversity value. Notably, there are sparse mature trees present throughout the site. In this respect, there is potential for development of the site to lead to negative effects on biodiversity through direct loss of habitats and any associated species. Therefore, development should seek to retain and enhance these habitats where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national policy. It is considered that the strategic nature of the site presents an opportunity to exceed the mandatory requirement of 10% net-gain, with the potential for significant long-term positive effects.</p> <p>Overall, Caldicot East has potential to lead to significant negative effects against this ISA topic. This is due to the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 1.2km of the site. Caldicot East is also constrained in terms of ancient woodland at Farthing Hill, which is located adjacent to the site. Nevertheless, there is still potential for Caldicot East to deliver positive effects through landscape-led masterplanning that avoids impact upon ancient woodland and includes strategic level biodiversity enhancement/ net gain. Therefore, uncertainty is noted at this stage, reflecting the findings of the HRA AA. The AA found that without definite boundaries for the strategic site allocation, and only some policy wording, and the lack of key evidence (e.g. no air quality assessment), it was not possible to undertake a fully conclusive Appropriate Assessment at this stage. It is recognised that a fully conclusive HRA AA will be carried out at the Deposit stage which will further inform the ISA.</p> |                        |

| ISA Topic               | Caldicot East   | Significant<br>Effect? |
|-------------------------|---|------------------------|
| Historic<br>Environment | <p>The delivery of strategic site Caldicot East would likely include some development within the Caldicot Conservation Area, with the potential for negative effects. This reflects the largely greenfield nature of the site, in addition to its scale and size in the context of the Conservation Area. While outside of the strategic site, development also has the potential to impact upon Caldicot Castle Grade I listed building and Scheduled Monument. Development of Caldicot East could result in the loss of small areas of greenfield/ open space in the setting of the castle, which is also a Country Park. In light of the constraints discussed, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified. However, a degree of uncertainty is noted at this stage, reflecting the potential for positive design, layout and masterplanning to mitigate effects to some extent.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Caldicot East does not fall within, or adjacent to, these Landscapes of Outstanding or Special Historic Interest.</p> <p>It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The strategic site is not considered likely to have a significant effect on the Welsh language.</p> <p>Overall, whilst uncertainties exist, Caldicot East is considered to have potential for significant residual negative effects due to its location within the Caldicot Conservation Area, containing Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. In this respect, development is likely to impact the intrinsic qualities, and setting of these heritage assets. While it is noted that's suitable site design/ layout can mitigate this to some degree, specific details in this respect are absent at this stage.</p> | <b>Yes – negative</b>  |
| Landscape               | <p>As a largely rural county, Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Focusing on the Severnside area, whilst the area is not constrained by international or national landscape designations, the west of Caldicot is separated by an important Green Wedge from Rogiet. However, development at Caldicot East, to the east of Caldicot, will therefore not contribute towards coalescence between Caldicot and Rogiet. Nevertheless, the site</p>  | <b>Yes – negative</b>  |

| ISA Topic         | Caldicot East   | Significant<br>Effect? |
|-------------------|---|------------------------|
|                   | <p>does greatly reduce the current landscape gap between Caldicot and Crick. However, it is noted that the M48 provides a degree of separation between the two settlements.</p> <p>Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Caldicot East does not fall within, or adjacent to, these Landscapes of Outstanding or Special Historic Interest.</p> <p>A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development<sup>94</sup>. The study found that there is capacity for housing in Monmouthshire focussing on the larger settlements, which includes Caldicot, a Primary Settlement within the Severnside area. However, Caldicot East is categorised as having a high-medium sensitivity to residential development. Therefore, development at the site has potential to lead to long-term negative effects.</p> <p>Overall, Caldicot East has the potential to affect the character and setting of the settlement and wider landscape, depending on the design and layout of development. The site has a medium-high sensitivity to housing development and would extend the settlement of Caldicot to the northeast towards the settlement of Crick, whilst extending development north of the Caldicot Castle Country Park (which is also a conservation area). In this respect, long-term significant negative effects are anticipated. Nevertheless, it is noted that mitigation (i.e. through landscape-led masterplanning, sensitive design and layout to avoid the most sensitive areas) could reduce the significance of the potential negative effects. However, uncertainty is noted at this stage, recognising that mitigation including supporting infrastructure will be developed to support the Deposit RLDP.</p> |                        |
| Climate<br>Change | <p>Monmouthshire's rurality, combined with its limited public transport, high levels of car ownership and the subsequent reliance on the private car, and high energy consumption, all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such Caldicot East will be required to contribute positively towards meeting the Council's aim of reducing its</p>   | <b>No</b>              |

<sup>94</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

| ISA Topic | Caldicot East   | Significant<br>Effect? |
|-----------|---|------------------------|
|           | <p>net carbon emissions to zero by 2030. Given the strategic nature of Caldicot East, a key consideration in this respect is the potential for the site to deliver decentralised heat/power generation from renewable or low carbon sources and deliver development to high standards of 'sustainable design and construction'. While it is recognised that requirements in this respect are absent until the Deposit Stage, uncertain positive effects can be concluded at this stage.</p> <p>The strategic site will also contribute positively towards reducing carbon emissions by reducing the need to travel and encouraging the use of sustainable transport modes. The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Caldicot East performs well in this respect, directing growth towards the southern extent of the county, capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Caldicot Train Station is approximately 2.7km from the site, a 33-minute walk or a 7-minute drive. In this respect, residents are likely to be highly reliant on the private car. There is currently not a bus stop near the site, however provision of a bus stop as part of the development would likely increase the uptake of public transport. Given the strategic scale of the site, Caldicot East is assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. It is considered that site specific details will be included in the Infrastructure Plan which will be developed to support the Deposit RLDP. Nevertheless, it is noted that the utilisation of the M4 itself will result in continued high car use in the County.</p> <p>As touched upon above, in terms of emissions related to buildings, Caldicot East has the potential to capitalise upon opportunities to minimise both embodied and operational carbon emissions associated with development from the offset. In terms of embodied carbon, this includes the use of local/ sustainable building materials, and in terms of operational carbon, this includes the use of energy-saving measures such as insulation, double glazing and water recycling.</p> <p>When considering climate change mitigation, Caldicot East mostly has a very low risk of flooding from rivers and the sea, and a very low risk of flooding from surface water. However, the western boundary of the site borders a stretch of land at high risk of flooding from rivers, whilst an isolated area in the north half of the site is high risk of flooding from surface water. Despite this, the site has potential to support adaptation to the potential effects of climate change by utilising sustainable drainage systems (SuDS)</p> |                        |

| ISA Topic | Caldicot East  | Significant<br>Effect? |
|-----------|--|------------------------|
|           | <p>and providing improvements to the local green infrastructure network. Development will also be directed away from these areas of high flood risk in line with higher tier planning policy and guidance via PPW11 and Technical Advice Note 15.</p> <p>Overall, the scale of development proposed at Caldicot East is unlikely to have a significant effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. While there is the potential for the site to deliver climate change mitigation objectives, supporting low carbon / renewable energy generation, at this stage there remains uncertainty regarding what might be feasible and deliverable in this respect. The site performs positively in terms of supporting the uptake of sustainable travel, capitalising upon strategic transport links to the south of the county. Additionally the likely delivery of transport improvements given the scale of development proposed is favourably noted. However, it is noted that the utilisation of the M4 corridor will result in continued high car use.</p> |                        |



## Summary of assessment of Preferred Strategic Site Allocations

Summary conclusions of the assessment of Preferred Strategic Site Allocations are presented below.

**Table AC.4 Assessment of Preferred Strategic Site Allocations**

| ISA Topic                                  | Abergavenny East | Bayfield, Chepstow | Caldicot East  |
|--|------------------|--------------------|----------------|
| Economy and Employment                     | Yes – positive   | No                 | Yes – positive |
| Population and Communities                 | Yes – positive   | Yes – positive     | Yes – positive |
| Health and Wellbeing                       | Yes – positive   | Yes – positive     | Uncertain      |
| Equalities, Diversity and Social Inclusion | Yes – positive   | Yes – positive     | Yes – positive |
| Transport and Movement                     | No               | No                 | No             |
| Natural Resources                          | Yes – negative   | Yes – negative     | Yes – negative |
| Biodiversity and Geodiversity              | Uncertain        | Uncertain          | Uncertain      |
| Historic Environment                       | Uncertain        | Uncertain          | Yes – negative |
| Landscape                                  | Yes – negative   | Yes – negative     | Yes – negative |
| Climate Change                             | No               | No                 | No             |

Significant positive effects are anticipated for all three sites regarding the population and communities and equalities, diversity, and social inclusion ISA topics. This is because all three sites will deliver enough housing to meet the identified housing need, locating development close to services and facilities and employment opportunities, supporting the growth of existing communities.

Significant positive effects are also anticipated for Abergavenny East and Caldicot East regarding the economy and employment ISA topic. This is because these sites are proposed to deliver employment land alongside housing, which, in combination with their proximity to existing local employment sites, will contribute to self-containment, boosting the local economy. Conversely, Bayfield is proposed for residential use alone, and is unlikely to encourage inward investment and support local economic growth directly.

Finally, significant positive effects are anticipated for Abergavenny East and Bayfield regarding the health and wellbeing ISA topic. This is because these sites have good access to health facilities, active travel routes and the open countryside.

No significant effects are predicted for the transport and movement and climate change ISA topics across all three sites. Regarding the former, this is because whilst all three sites direct growth towards a Tier 1 settlement with good access to the strategic transport network, significant positive effects are largely dependent on the delivery of specific transport infrastructure improvements, and whilst these may be committed to at the Deposit Stage, no detailed commitments have been made at this stage. Regarding the latter, this is because the scale of development proposed at all



three sites is unlikely to have a significant effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework.

Moreover, no significant effects are anticipated for Bayfield regarding the economy and employment ISA topic because, whilst long-term positive effects are predicted, many employment opportunities, both within Chepstow and further afield, will likely be accessed by private car.

Significant negative effects are anticipated across all three sites for the natural resources and landscape ISA topics. This is largely due to the potential for all three sites to exacerbate air quality issues (particularly Bayfield, as Chepstow contains an AQMA), the loss of BMV/ greenfield land, and high/ medium landscape sensitivity.

Finally, significant negative effects are predicted for Caldicot East regarding the historic environment ISA topic. This is due to a small part of the site intersecting with the Caldicot Conservation Area, and the site's proximity to Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. In this respect, development is likely to impact the setting of these heritage assets. While it is considered effects may be mitigated to some extent through masterplanning and design, this is uncertain at this stage and therefore a precautionary approach has been taken.

Uncertainty is noted for Caldicot East regarding the health and wellbeing ISA topic due to potential negative impacts related to air quality, in the absence of details regarding supporting infrastructure and design/ layout of proposed development. It is recognised that given the size of the site, there is likely greater potential to mitigate issues such as this through infrastructure delivery.

Uncertainty is noted for all sites in relation to biodiversity, reflecting the findings of the HRAAA. The AA found that without definite boundaries for the strategic site allocations, and only some policy wording, and the lack of key evidence (e.g. no air quality assessment), it was not possible to undertake a fully conclusive Appropriate Assessment at this stage. It is recognised that a fully conclusive HRAAA will be carried out at the Deposit stage which will further inform the ISA.

Finally, uncertainty is noted for Abergavenny East and Bayfield regarding the historic environment ISA topic because of the sites' impact on nearby heritage assets is largely dependent on site design/ layout, which is not confirmed at this stage.

