# Monmouthshire Replacement Local Development Plan

# Self-Assessment of the Preferred Strategy against the Tests of Soundness December 2022





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#### 1. Purpose of this Paper

- 1.1 This Background Paper has been published alongside the Replacement Local Development Plan (RLDP) Preferred Strategy<sup>1</sup>. As part of the development plan process the Council needs to demonstrate that the Plan is 'sound'. The purpose of this paper is to assess the Preferred Strategy against the tests of soundness set out in the Development Plans Manual (Edition 3 March 2020).
- 1.2 The self-assessment undertaken is considered to demonstrate that the Preferred Strategy and the stages undertaken and processes followed to reach this stage are 'sound'.
- 1.3 The soundness of the RLDP will continue to be assessed against the tests of soundness as the Plan progresses and eventually at an independent Examination by a Planning Inspector.
- 1.4 The Council's self-assessment of the Preferred Strategy is set out below.
- 1.5 One of the soundness tests relates to the Plan's general conformity with Future Wales: The National Plan 2040 (Welsh Government, February 2021). An assessment of the Preferred Strategy against the policies of Future Wales has been undertaken and is attached at Appendix 1.

<sup>&</sup>lt;sup>1</sup> <u>https://www.monmouthshire.gov.uk/planning-policy/local-development-plan-revision/?preview=true</u>

### 2. Self-assessment of the Preferred Strategy against the Tests of Soundness

Development Plans Manual – Ed 3, March 2020	Response
	This self-assessment has been undertaken to monitor consistency with the Tests of Soundness at the
	Preferred Strategy stage of the Replacement Local Development Plan process. It has also helped identify
	future requirements as we work towards the preparation of the Deposit Plan.
<ul> <li>Preparation Requirements:</li> <li>Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)</li> <li>Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? (when</li> </ul>	The Preferred Strategy has been prepared in accordance with the procedural requirements. Notable reference should be had to the publication of the Initial Integrated Sustainability Appraisal (ISA) (November 2022) and the Habitats Regulations Assessment (HRA) Report (November 2022) which have been published as supporting documents to the Preferred Strategy. These build on the work undertaken to accompany earlier stages of the Replacement Local Development Plan (RLDP) process – Integrated Sustainability Appraisal Scoping Report (December 2018) and Initial Habitats Regulations Assessment Screening Report (December 2018).
published or adopted respectively)	Scheduled consultation arrangements and documents are in accordance with the LDP Regulations (2005 as amended 2015). The scope and method of consultation is consistent with the Community Involvement Scheme, which includes engagement with a range of stakeholders including the public, elected members, developers and statutory consultees. Many of the consultation measures put in place during the Covid-19 pandemic have been retained to add to the methods of engagement. These provide communities and stakeholders the ability to engage with the RLDP consultation in a virtual manner through webinars and are scheduled alongside face to face 'drop-in' sessions. Full details of the consultation arrangements and documentation can be viewed in the consultation email and letter and the Council's website.
	<ul> <li>Prior to this consultation on the new Preferred Strategy, significant non-statutory consultation has also been undertaken to gain an understanding of the issues and options relevant to the County, with a couple of stages revisited and reviewed due to updated evidence, the Covid-19 pandemic and consideration of comments received during consultation exercises. A summary of key RLDP stages undertaken is set out in Appendix 1 of the Preferred Strategy.</li> </ul>
	<ul> <li>Full details of the consultation methods undertaken will be set out in the Initial Consultation Report prepared to accompany the Deposit Plan.</li> </ul>
	<ul> <li>Welsh Government published Future Wales: The National Plan 2040 in February 2021. This establishes the national development framework, setting the direction for development in Wales to 2040 and provides the</li> </ul>

policy framework for SDPs and LDPs, with a requirement for the lower tier plans to be in general conformity with Future Wales. The policy framework set out in the Preferred Strategy is considered to be in general conformity with this and does not preclude the objectives of Future Wales being met during the RLDP Plan period. The detailed boundaries associated with many of Future Wales' policies will be pursued through the preparation of the SDP, which has yet to commence. It provides the policy context for national and regional growth, with the RLDP providing the policy framework for growth to address and meet Monmouthshire's evidenced local issues and needs. An assessment of the Preferred Strategy against the policies of Future Wales is attached at Appendix 1.

The level of growth set out in the Preferred Strategy 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, our evidence shows that the proposed level of growth is essential to deliver on our local evidence-based issues and objectives and to ensure the RLDP is 'sound'. It is supported by policies 3, 4, 5 and 7 of FW, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The new growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for wider South East Wales region by striking a compromise between achieving our local evidence-based objectives that underpinned the previous Preferred Strategy in June 2021 and the Welsh Government's response which objected to the level of growth Area of the Cardiff Capital Region. Conversely, a lower level of growth as set out in the Welsh Government's response to the previous June 2021 strategy would not address the local evidence-based issues and objectives and would therefore fail the tests of soundness.

Spatially, the RLDP preparation process has reflected the policies of Future Wales having regard to the strategic nature of the Preferred Strategy document. Consideration of earlier spatial options for Dispersed Growth and New Settlement and New Settlement with Limited Growth in Primary Settlements, Secondary Settlements and Severnside only, which formed part of the initial Growth and Spatial Options Consultation Paper (June 2019), have been ruled out for the RLDP on the basis that Welsh Government officials have stated that a New Settlement cannot be pursued outside of the Strategic Development Plan or joint LDP processes. Such changes are considered to demonstrate actions taken to ensure general conformity with Future Wales and SDP processes.

A further issue of relevance to Monmouthshire is the requirement of Policy 34 for the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region. The South East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration with the detailed boundary to be defined through the preparation of the SDP. In advance of an SDP, the area shown for consideration in Future Wales should be treated as a designated Green Belt. In assessing the spatial strategy for distributing growth within the County consideration has be given to paragraph 3.72 of PPW11 which states that:
"when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this".
Such an approach is essential to address the Council's significant concerns regarding the long-term policy implications of the permanency of a Green Belt designation on future growth and prosperity in Monmouthshire.
<ul> <li>In this respect, the Preferred Strategy is considered to facilitate the identification of a Green Belt in southern Monmouthshire with the primary settlements situated outside the broad coverage, consistent with the indicative plan and meeting the aims of Policy 34 but allowing for an appropriate level of growth in Monmouthshire to address its local challenges and issues. A Green Belt and Green Wedge Review has been commissioned on a sub-regional basis to inform the evidence base of the RLDPs and the South East Wales SDP.</li> </ul>
More generally, the overarching policy framework of the Preferred Strategy is considered to align with the policy aims of the Future Wales, with many common policy themes running through both. Examples of this include placemaking (Policy 2), active travel (Policy 12), town centre first (Policy 6) and creating resilient ecological networks and enhancing green infrastructure provision (Policy 9). Particularly relevant in a Monmouthshire context is the policy focus on supporting rural communities (Policy 4) and the rural economy (Policy 5) and delivering affordable homes (Policy 7) which are key challenges for the County. In this respect the Preferred Strategy is considered to set the strategic framework for delivering the policy

	objectives of Future Wales at a local level. The proposed Strategy provides an opportunity for public sector leadership (Policy 3), with the Caldicot East Strategic Development Site including Council-owned land, allowing for different approaches to affordable housing delivery to be explored. Further details of alignment with FW2040 are set out in Appendix 1.
<ul> <li>Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?) Questions</li> <li>Does it have regard to national policy (PPW) and Future Wales?</li> <li>Does it have regard to Well-being Goals?</li> <li>Does it have regard the Welsh National Marine Plan?</li> </ul>	The formulation of the Preferred Strategy has been prepared with full regard to the relevant plans and strategies, whilst recognising that it will need to respond and develop as it progresses through its preparatory process. The national, regional and local plans are where relevant identified within the Preferred Strategy but also within the background and supporting documents and within the in-combination considerations of the ISA and HRA Reports. The ISA process reviews the relevant policies, plans and programmes and considers their implications in relation to the growth levels and spatial options considered and have subsequently informed the new Preferred Strategy and associated Strategic Policies.
<ul> <li>Does it have regard to the relevant Area Statement?</li> <li>Is the plan in general conformity with the NDF?</li> <li>Is the plan in general conformity with relevant SDP (when adopted)?</li> <li>Is it consistent with regional plans, strategies and utility programmes?</li> <li>Is it compatible with the plans of neighbouring LPAs?</li> <li>Does it reflect the Single Integrated Plan (SIP) Well-being Plan or the National Park Management Plan (NPMP)?</li> <li>Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?</li> </ul>	<ul> <li>Each of the Test 1 questions is discussed in turn:</li> <li>National Policy (PPW11) and Future Wales</li> <li>The Preferred Strategy has regard to national policies and guidance as set out in PPW11 and associated Technical Advice Notes (TANs). The Preferred Strategy and supporting documents refer to relevant sections of PPW11 specific to the issue being discussed and the policy requirements of PPW11 have been considered and incorporated where relevant in the preparation of the Strategic Policies. The supporting text adds further commentary on the links to national guidance, including the identification of further work to be undertaken in the preparation of the Deposit Plan. Each of the Strategic Policies is supported by a policy context section which sets out links to the wider policy framework including PPW11 and TANs and are grouped by the overarching policy themes of PPW11. The relationship between the Preferred Strategy and Future Wales is discussed above and in Appendix 1. Reference has also been made to Welsh Government's <i>Building Better Places</i> (July 2020) which sets out its response to the Covid-19 pandemic and <i>Llwybr Newydd</i> (March 2021). The RLDP and Preferred Strategy are recognised as a key mechanism in delivering the planning policy priorities identified in national policy.</li> <li>Well-Being Goals</li> <li>The Preferred Strategy has full regard to the provisions of the Well-being of Future Generations Act 2015 and the well-being goals, as well as the five ways of working as demonstrated by the additional non-</li> </ul>

and Spatial Options Papers. The promotion and recognition of well-being has been a consideration from the outset of the Plan preparation process. The links between the RLDP objectives and the Well-being Goals is clearly set out in the Issues, Vision and Objectives Paper (updated December 2022), which relates and groups the issues and opportunities under the well-being goals themes. Each Strategic Policy provides a table setting out its links to the wider policy framework and which of the well-being goals it will contribute to.

#### Welsh National Marine Plan

The Strategic Policies cover a number of issues and policy areas which complement the aims and objectives of the Marine Plan. In particular, Strategic Policies S3 – Sustainable Place Making and High Quality Design, S4 – Climate Change and S17 – Green Infrastructure, Landscape and Nature Conservation complement the Marine Plan by directing development away from areas of flood risk, protecting and enhancing green infrastructure and networks and recognising the challenges posed by climate change. The relationship with the Marine Plan will be enhanced further through the preparation of detailed policies in the Deposit Plan. The spatial strategy avoids new site allocations in the upper Wye river catchment due to the absence of an identified strategic solution to river water quality issues with particular regard to phosphates. In doing so, the Preferred Strategy seeks to safeguard the river ecosystem, which flows into the Severn Estuary and National Marine Plan area.

#### Area Statement

Monmouthshire forms part of the South East Wales Area Statement along with Blaenau Gwent, Caerphilly, Newport and Torfaen, which was published by NRW in March 2020. The Preferred Strategy has regard to the Area Statement's strategic themes of Linking Our Landscape; Climate Ready Gwent; Healthy Active Connected; and Ways of Working and through the Strategic Policies seeks to achieve many of the outcomes associated with each theme. Examples of this include Strategic Policy S17 – Green Infrastructure, Landscape and Nature Conservation which is consistent with many of the outcomes sought from the Area Statement including improved resilience of our ecosystems across Gwent and the need to safeguard and enhance core habitat networks and support ecological connectivity on and between our best sites across Gwent. Similarly, Strategic Policies S3 – Sustainable Placemaking and High Quality Design and S4 – Climate Change are consistent in their aims as many of the outcomes associated with Climate Ready Gwent and Healthy Active Connected. Consequently, the Preferred Strategy is considered to be consistent with the key themes and aims of the South East Wales Area Statement.

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

• Conformity with Future Wales is discussed above and in Appendix 1.

#### Strategic Development Plan (SDP)

 The preparation of an SDP has not yet formally commenced for the region due to outstanding legal and taxation issues with establishing the CJC. However, Monmouthshire County Council has been actively involved in the discussions and agreements put in place to date and Council has formally resolved to be part of the SDP.

#### Regional plans, strategies and utility programmes

- The Preferred Strategy has been prepared within the context of the relevant regional plans, strategies and utility provider programmes, with Appendix 2 of the Preferred Strategy, associated background papers and the supporting commentary of the Strategic Policies providing details of the documents that have been considered. Specific reference is made to the Cardiff Capital Region and the role Monmouthshire can play in contributing to its main objectives and programmes. The Initial Sustainability Assessment and Habitats Regulations Assessment also consider the in-combination effects of the Preferred Strategy along with other plans and strategies in the region and conclude that the Strategy is in line with both regional and local environmental protection objectives.
- The preparation of the Preferred Strategy has involved a regional and coordinated approach to the collection of evidence, including population projection modelling, regional employment study, and Integrated Sustainability Assessment and Habitats Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will continue through the preparation of the Deposit Plan, with a number of jointly commissioned pieces of evidence already in progress including a Development Viability Model, Renewable Energy Assessment, Strategic Flood Consequence Assessment and Green Belt and Green Wedge Review. Long standing regional working methods associated with areas such as waste and minerals are continued and are reflected in the Preferred Strategy.
- Utility companies have been involved from an early stage in the development of the Preferred Strategy to ensure consistency with their programmes. For example, extensive discussions have taken place between the Council and Dŵr Cyrmu Welsh Water to identify solutions to the phosphates constraints affecting the County, as well as other utility companies such as Western Power to understand capacity for growth and for renewable energy. In terms of riverine water quality, Dwr Cymru Welsh Water has committed £60m to addressing the phosphate water quality issues in Welsh SAC rivers, including committed investment in the

Usk (Brecon and Llanfoist) and Wye (Monmouth) Wastewater Treatment Works (WwTWs). Capacity and phosphate stripping improvements are nearing completion in Brecon, and a strategic solution has been identified to address phosphate levels at the Llanfoist WwTW. This solution requires detailed design and Natural Resources Wales' approval, but is scheduled to be delivered alongside DCWW's Asset Management Plan 7 2020-2025. In combination, these investments provide headroom for development within the upper Usk catchment. In contrast, there is not yet a strategic phosphate solution identified for the upper Wye catchment. Although DCWW has committed to investment at the Monmouth WwTW, there are two complicating factors. Firstly, recently completed capacity improvements require monitoring prior to further works or alterations. Secondly, naturally elevated iron levels in the river Wye catchment mean a different phosphate stripping solution is required. These issues have directly influenced the new spatial strategy. Further detailed discussions with utility providers will follow as part of the assessment on candidate sites and the preparation of the Deposit Plan.

#### Plans of Neighbouring Authorities (LPAs)

- The Preferred Strategy takes into account cross-border issues and the plans of neighbouring authorities and reflects the discussions and agreements reached relating to cross-border issues. Examples include agreement on the approach to the housing numbers attributed to growth in the Brecon Beacons National Park Authority area, growth levels in Torfaen, consideration of Newport's capacity to accommodate an element of Monmouthshire's growth on previously developed land, and discussion with the Forest of Dean regarding their issues and objectives and growth strategy with particular reference to infrastructure impact on Chepstow. Further details of joint working and collaboration are set out in Appendix 3 of the Preferred Strategy.
- As noted above, in recognition of the value of working with neighbouring authorities, and in response to PPW11 and the Development Plans Manual (Ed 3, March 2020) emphasis on collaborative working, we have worked on or are working on a number of pieces of evidence together. These include: a Larger than Local Employment Study, Population and Household Projections, Integrated Sustainability Appraisal, Habitats Regulation Assessment, Development Viability Model, Renewable Energy Assessment and Green Belt and Green Wedge Review. The nature of the co-operation with authorities and sharing of approaches including comparable thematic policy areas will be developed as the Plan's preparatory process continues. This will build on work undertaken by SEWSPG and topic-based Pathfinder groups, which have helped establish a common approach to a number of Plan preparation tasks including candidate sites assessments, sustainable settlement appraisals and retail and employment land monitoring.

 Regard will continue to be had to the emphasis on regional working in light of future provisions around Strategic Development Plans and Future Wales. Single Integrated Plan (SIP), Well-being Plan or the National Park Management Plan (NPMP) The Monmouthshire Well-being Plan was prepared by the Public Service Board and endorsed in February 2018. The RLDP Issues, Vision and Objectives are heavily drawn from and reflect the PSB Well-being Plan which was extensively consulted upon by the Public Service Board in 2017 and resulted in contributions from more than 1,400 people. This approach reflects Welsh Government guidance which recognises the significance of local well-being plans as a key evidence source for LDP preparation (paragraphs 1.6 and 1.21, PPW11). In this respect, the Well-being Plan has been an integral part of the Preferred Strategy preparation ensuring it seeks to address key issues identified for Monmouthshire. The Strategic Policies also set out which of the Well-being Plan objectives it has a particular link to. The Council is now working on the Gwent Public Services Board Well-being Plan. • The new Preferred Strategy is informed by the new Administration's draft Community and Corporate Plan. • The area of Brecon Beacons National Park that sits within Monmouthshire County Council's administrative area is excluded from the extent of the RLDP's geographical area and does not form part of Monmouthshire's Planning Authority remit. The relationship and impact on the Brecon Beacons National Park, does, however, remain a significant consideration for the preparation of the RLDP. The Preferred Strategy is considered to reflect the aims of the 'A Management Plan for the Brecon Beacons National Park' (2015-2020), particularly its themes aiming to 'Manage the Parks Landscape' and 'Conserving and Enhancing Biodiversity'. Strategic Policy SP17 – Green Infrastructure, Landscaping and Nature Conservation is of particular relevance to achieving the aims of the Management Plan. The Green Belt and Green Wedge Review will carefully consider the setting of the National Park, noting the Candidate Site submissions for both development and protection as a Green Wedge of the foothills to the north west of Abergavenny. Joint Working and Collaboration on both plan preparation and the evidence base As demonstrated above, a significant amount of the evidence base has been commissioned on a joint basis with Blaenau Gwent and Torfaen and on a sub-regional basis with Blaenau Gwent, Torfaen, Caerphilly and Newport. We have held regular joint meetings to ensure there is a consistency of approach. Further details of joint working and collaboration are set out in Appendix 3 of the Preferred Strategy and specific examples referenced throughout the Preferred Strategy in relation to the Strategic Policies.

	<ul> <li>On-going meetings and collaboration are pursued through the longstanding South East Wales Strategic Planning Group (SEWSPG), the Planning Officers South Wales (POSW) and the South East Wales Planning Officer Society (SEWPOS).</li> </ul>
<ul> <li>Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)</li> <li>Questions <ul> <li>Is it locally specific?</li> <li>Does it address the key issues?</li> <li>Is it supported by robust, proportionate and credible evidence?</li> <li>Can the rationale behind plan policies be demonstrated?</li> </ul> </li> <li>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</li> <li>Are the vision and the strategy positive and sufficiently aspirational?</li> <li>Have the 'real' alternatives been properly considered?</li> <li>Is it logical, reasonable and balanced?</li> <li>Is it clear and focused?</li> </ul>	<ul> <li>Is it Locally Specific?</li> <li>The Preferred Strategy builds upon the objectives of the Well-being Plan, having regard to the outcomes of the consultation undertaken in its preparation and the embodying principles of the draft Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. The formulation of the Preferred Strategy is underpinned by this locally specific evidence base. Building on this and the extensive non-statutory consultation that has been undertaken to date (see Appendix 1 of the Preferred Strategy for a summary) the Preferred Strategy has emerged as a direct result of a number of very locally specific issues, with three core objectives becoming apparent as the Plan has progressed: delivering affordable housing to help address inequality, rebalancing the County's demography to ensure communities are socially and economically sustainable, and responding to the climate and nature emergency to ensure proposals are environmentally sustainable. The Preferred Strategy also responds to a number of challenges that have arisen following stakeholder consultation and engagement on the earlier non-statutory stages and the previous Preferred Strategy (June 2021). Of note is the Welsh Government objection to the level of growth set out in that previous Preferred Strategy and the new issue of phosphate water quality issues in the River Wye and River Usk.</li> <li>The Preferred Strategy proposes a level and distribution of growth that has regard to these locally specific issues, of delivering affordable homes, responding the climate and nature emergency by delivering net zero carbon ready homes and ensuring our communities are socially and economically sustainable and responding to these locally specific issues, whilst also ensuring the tRLDP delivers on our objectives and addresses our core issues of delivering affordable homes, responding the climate and nature emergency by delivering net zero carbon ready ho</li></ul>

<ul> <li>Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites.</li> <li>Requiring new homes to be net zero carbon ready reflecting our commitment to responding to and tackling climate change.</li> <li>Promoting sustainable economic growth.</li> <li>Identifies Preferred Strategic Site Allocations within the primary settlements of Abergavenny, Caldicot and Chepstow, three of Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro Scheme.</li> </ul>
In preparing the Preferred Strategy three growth options and two spatial options were assessed against their contribution to the RLDP overarching objectives. Details of this assessment is set out in the Growth and Spatial Options Paper (September 2022). This assessment recognises that the growth level set in the new Preferred Strategy does not perform as well as the growth level associated with the Preferred Strategy proposed in June 2021, in relation to addressing RLDP objectives relating to ageing demographic and the ability to create resilient communities and rural communities. However, it performs better than the growth level prescribed by Welsh Government in its response to the June 2021 Preferred Strategy, which performed poorly against eight objectives including its ability to address housing, demographic changes and economic growth. Spatially, two options have been considered, the first relating to proportionate distribute across the County and the second distribution across the County's most sustainable settlement with the exclusion of the upper River Wye phosphates catchment area. When assessed against the RLDP objectives, proportionate growth performed better than the chosen spatial option to exclude the upper River Wye Phosphates catchment area, however, due to the NRW requirement to demonstrate phosphate neutrality, this is considered to be a deliverable spatial option.
<ul> <li>Overall, it is recognised that the Preferred Strategy is unable to deliver the Council's objectives in those settlements in the phosphate affected upper River Wye catchment, including the delivery of affordable homes. However, as there are currently no identified strategic solutions to the treatment of phosphates in the upper River Wye catchment area during the Plan period this is unavoidable. However, if a strategic solution to the phosphate issue is secured in the Monmouth Wastewater Treatment Works during the Plan period, windfalls sites within settlement boundaries could be developed. It is proposed to include within the settlement boundary three current sites: land at Rockfield Road, Monmouth with planning permission but unable to proceed at present due to phosphates, and two current LDP sites at Drewen Farm, Monmouth</li> </ul>

and Tudor Road, Wyesham that are unable to proceed due to phosphates. In accordance with the Development Plans Manual, these will be considered as 'bonus sites'.

#### Is it supported by robust, proportionate and credible evidence?

Extensive evidence building has been undertaken to support the Preferred Strategy. A full breakdown is provided in Appendix 2 of the Preferred Strategy. In addition to these, further studies and evidence will be or are currently being undertaken and commissioned, including viability modelling, Strategic Flood Consequence, and Green Belt and Green Wedge Review. A renewable energy assessment and site search process to meet the identified Gypsy and Traveller accommodation need are ongoing. Further work will be undertaken during the Plan preparatory process as appropriate and necessary.

#### Can the rationale behind plan policies be demonstrated?

The evidence gathered has informed the preparation of the strategic policies, which need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Plan. Each strategic policy has a reasoned justification and a summary table setting out how it relates to the relevant RLDP objectives, national policy, and Well Being Goals, as well as the key evidence. The Strategic Policies have been grouped by PPW11's overarching policy themes and the relevant sections of PPW11 are referenced as these combined with the locally specific evidence forms a key approach to establishing the rationale to the Plan's policies.

#### Does it seek to meet assessed needs and contribute to the achievement of sustainable development?

The Preferred Strategy is derived from evidence that assesses the needs of the County, particularly in respect of homes (both market and affordable) and jobs, as well as the need to protect the most valuable areas of land. The Growth and Spatial Options Paper (September 2022) and Initial Integrated Sustainable Appraisal (November 2022) accompanying the Preferred Strategy, appraise the Preferred Strategy's contribution to locally specific needs and sustainable development credential respectively. The Integrated Sustainability Appraisal process has an integral and iterative role in the preparation of the RLDP. In this respect, its use in testing or measuring the performance of the RLDP from its inception through to the preparation of the Preferred Strategy is indicative of the iterative feedback between the ISA and the RLDP as work progresses.

- The Preferred Strategy contribution to the RLDP locally specific objectives is discussed above, which concludes that the Strategy performs well against addressing the needs of the County but is unable to deliver the Council's objectives in those settlements in the phosphate affected upper River Wye catchment.
- Similar results were concluded in the Initial Integrated Sustainability Assessment of the Options considered as part of the Preferred Strategy process. In summary, Growth Option 1 (PS June 2021) 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 (the new Preferred Strategy growth level) performs slightly less positively than Option 1 given the level of growth proposed is less and therefore less affordable housing and less demographic change result, however similar positive effects are predicted under this Option, providing a more balanced demographic, more affordable housing and more sustainable communities than predicted under Option 3 (WG prescribed growth level).
- Spatially, while both options perform well, options 1 (proportionate distribution) performs more positively than Option 2 (exclusion of upper River Wye catchment) 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. Option 2 also performs positively in this respect; however, the significance of effects is uncertain due to 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. However, the environmental constraint makes this unavoidable.
- The ISA of the Preferred Strategy, which combines growth option 2 with spatial option 2 recognises that whilst the Preferred Strategy is unable to fully deliver the Council's objectives, the strategy nonetheless maximises delivery of core issues and objectives within environmental and national policy constraints. When assessed against the ISA themes the Preferred Strategy is predicted to have a positive significant effect on themes including economy and employment, population and communities and transport and movement, in recognition of the Preferred Strategy proposing to deliver new employment and homes to meet identified needs, distributed to the higher tier settlements of Abergavenny, Caldicot and Chepstow,

where there is greater need and better access to sustainable transport modes and wider infrastructure. It recognises, however, that limiting employment and housing opportunities in the settlements of the upper River Wye catchment area could exacerbate out-commuting and may exacerbate any existing demographic issues in Monmouth and other settlements in the upper River Wye catchment. The assessment acknowledges that a solution is however, being sought between the relevant organisations which may facilitate a level of growth in the upper River Wye catchment during the Plan period.

- Effects remain uncertain at this stage in the Plan process on a number of ISA themes including health and wellbeing equalities, diversity and social inclusion, biodiversity, historic environment, landscape and climate change. This is primarily related to the limited detail available to fully assess the potential effects due the strategic level of the plan stage and also recognition of limited growth in Monmouth other upper River Wye catchment settlements. Significant negative effects are predicted in relation to the natural resources ISA theme, which recognises that given the widespread nature of high quality ALC throughout the County that substantial loss of the County's soil resource is inevitable.
- In addition, the Local Housing Market Assessment has provided key evidence on the level of affordable housing need in the County. An Employment Land Review has been undertaken to quantify the future employment land requirements based on the Welsh Government Practice Guidance for Economic Development. This will be supplemented by an Economic Development Strategy. The need for homes and jobs has also been considered alongside the need to protect the County's land resources for environmental, agricultural and nature conservation purposes. The balance to be achieved between these differing and sometime competing needs will continue to be a key focus of the RLDP as it progresses to the Deposit stage.
- The hierarchy of settlements has been developed taking account of the sustainability credentials of each settlement and how they can contribute to their wider communities. This hierarchy recognises and acknowledges the availability of services and facilities, accessibility issues and other considerations. Reference should be made to the Sustainable Settlement Appraisal Background Paper (December 2022) for full details. This work has formed the basis for the proposed spatial strategy, which seeks to ensure development is located in the most sustainable settlements within a Monmouthshire context.

#### Are the vision and the strategy positive and sufficiently aspirational?

The RLDP Vision has been developed to take into account the key challenges and opportunities for change, whilst being aspirational and positive enough to seek a reversal to the otherwise projected decline in job numbers and younger age groups present in the County. The vision for growth is a positive one which seeks to create high quality, sustainable places in both urban and rural settlements within a Monmouthshire context. The Preferred Strategy takes a positive, yet realistic approach to achieving growth within the context of Monmouthshire and tackling key national and local issues, such as the provision of affordable homes, growing Monmouthshire's economic base, tackling climate change and creating sustainable places to live and work in. The strategy is considered to present a balanced approach to growth by putting forward a strategy that is aspirational enough to address a number of key issues facing the County, whilst also having regard to Welsh Government Officer concerns regarding alignment with Future Wales: the National Plan 2040 and phosphates water quality issues associated with the River Wye and River Usk.

#### Have the 'real' alternatives been properly considered?

- A number of different alternative growth and spatial options are considered in the Growth and Spatial Options Paper (September 2022), and also against the ISA themes through the Integrated Sustainability Assessment process, with a brief overview provided above in relation to 'Does it seek to meet assessed needs and contribute to the achievement of sustainable development?'. Having regard to the outcome of these assessments, four options setting out different combinations of growth and spatial options as set out in the Growth and Spatial Options Paper (September 2022) were considered as part of the Progressing the Monmouthshire's Replacement Local Development Plan Council Report on 27<sup>th</sup> September 2022. These were:
  - Option 1: Proceed with the previous Preferred Strategy that we consulted on in July-August 2021;
  - Option 2: Adopt an amended approach and proceed with a demographic-led strategy (based on the latest detailed population data) and an amended spatial strategy to take account of the phosphate constraint in the River Wye catchment. This is the recommended option;
  - Option 3: Proceed with the WG prescribed maximum dwelling requirement (4,275 dwellings over the Plan period), and a spatial strategy that takes account of the phosphate constraint in the River Wye catchment; or
  - Option 4: Restart the RLDP process.
- Council endorsed option 2 as the basis for progressing the RLDP as set out in the new Preferred Strategy.

	<ul> <li>Is it logical, reasonable and balanced?</li> <li>The Preferred Strategy has emerged from a clear understanding of the issues at a national, regional and local level. It has considered a range of options and has had regard to the views expressed during the non-statutory consultation and engagement exercises to date and made changes to the options considered as a result. The Preferred Strategy has emerged from engagement and evidence and as such it is considered to be logical and reasonable within the context of the issues facing Monmouthshire. It is considered to provide a balanced approach that integrates with other plans and strategies, whilst ensuring it is reflective of national policy and the need for a sustainable and deliverable Plan.</li> </ul>
	<ul> <li>Is it coherent and consistent?</li> <li>The Preferred Strategy sets out a coherent strategy from which its strategic policies flow. The strategy is guided by, and consistent with, the Plan vision and objectives, the principles of sustainability and placemaking set out in national planning guidance, the growth and spatial options and the evidence base.</li> </ul>
	<ul> <li>Is it clear and focused?</li> <li>The Preferred Strategy is set out in a clear and logical form, clearly showing the links between the various elements of the Strategy. It provides a clear focus of its purpose, identifying the vision and issues associated with the Plan and how the Preferred Strategy will seek to address these.</li> </ul>
<ul> <li>Test 3: Will the plan deliver (Is it likely to be effective?)</li> <li>Questions</li> <li>Will it be effective?</li> <li>Can it be implemented?</li> <li>Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?</li> </ul>	<ul> <li>Will it be effective?</li> <li>The Preferred Strategy's objectives have emerged from an understanding of the challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The strategy seeks to integrate and reflect other plans and strategies as part of an integrated approach to delivery, maximising its opportunities to be effective in its implementation.</li> <li>The Preferred Strategy makes provision for approximately 5,400 – 5,940 homes (5,400 plus 10% flexibility) over the Plan period, including the provision of approximately 1,580 – 1,850 affordable homes. This level of growth will enable the provision of market and affordable housing and provides the opportunity to</li> </ul>
<ul> <li>Will development be viable?</li> <li>Can the sites allocated be delivered?</li> <li>Is the plan sufficiently flexible? Are there appropriate contingency provisions?</li> <li>Is it monitored effectively?'</li> </ul>	<ul> <li>address the unbalanced demography, improve labour force retention and assists in the County's housing affordability challenge.</li> <li>In order to meet the housing provision figure of 5,940, the RLDP will need to make new allocations for 2,200 new homes reflecting the number of units that already have planning permission or that will be delivered via other housing supply streams, such as windfall and infill sites. These new allocations provide the Council</li> </ul>

with the opportunity to open up longer term directions for strategic growth and implement place-making and climate change principles.
<ul> <li>The Preferred Strategy also provide the planning policy framework to facilitate the growth of the resident workforce to support 6,240 jobs over the Plan period to help grow Monmouthshire's economic base and</li> </ul>
reduce the out-commuting experienced within the County. This level of job growth aligns with the projected population and housing growth and takes account of adjustments to household membership rates for key
younger age groups and a reduced level of commuting by retaining more of the resident workforce.
<ul> <li>The Preferred Strategy establishes the requirement for new homes to be net zero carbon ready, reflecting the Council's commitment to responding to and tackling climate change.</li> </ul>
<ul> <li>It is recognised, however, that the Preferred Strategy is unable to deliver the Council's objectives in those</li> </ul>
settlements in the phosphate affected upper River Wye catchment. As there are currently no identified
strategic solutions to the treatment of phosphates in the upper River Wye catchment area during the Plan period this is unavoidable.
• As discussed in relation to Test 2 and the Strategy's ability to address local issues, it is recognised that the
Preferred Strategy does not perform as well against the RLDP objectives as the higher growth level proposed
under Option 1 and Spatial Option 1 to distribute growth proportionately across the County. However, it
performs better than the level of growth proposed by Welsh Government. Notwithstanding that however,
the Preferred Strategy does begin to address key issues including the ageing demographic, affordability
challenges and economic growth, whilst having regard to the phosphate constraints and Welsh Government's concerns regarding alignment with Future Wales: the National Plan 2040. Similar results
were concluded in the Integrated Sustainability Appraisal of the Growth and Spatial Options when assessed
against the ISA themes (see Test 2 for further details). Similarly, the ISA concludes that whilst the Preferred
Strategy is unable to fully deliver the Council's objectives, the strategy nonetheless maximises delivery of
core issues and objectives within environmental and national policy constraints.
Can it be implemented?
• The preparation of the Preferred Strategy is with the clear intention that it will be implementable and that
its policies and proposals will be delivered within the Plan period. The Preferred Strategy sets out a
deliverable spatial framework and strategic growth which is based on sustainability principles and is responsive to the needs of the communities of Monmouthshire. The policies and proposals (both strategic
and eventually specific within the future Deposit Plan) will provide the framework through which the Plan's
objectives will be implemented and the decision-making process undertaken. More detailed assessment

work, covering issues such as viability, phasing and deliverability of sites will be undertaken to support the preparation of the Deposit Plan.

- The level of affordable housing noted above aligns with the Council commitment to ensuring that the new site allocations provide 50% affordable housing. In order for residential sites to be allocated in the RLDP, it will be essential to demonstrate that sites are viable and deliverable, having regard to the Council's commitment for 50% affordable housing provision on new sites. This may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding.
- Providing for the level of jobs growth is part of a complex picture, including the provision of a deliverable range of employment land supply, in appropriate locations. It will also be achieved through the allocation of a minimum of 38ha of employment land to facilitate the delivery of industrial and business employment uses. It has, however, become widely accepted that there has been a fundamental shift in working practices experienced as a legacy of the Covid-19 pandemic, with a significant increase in people working from home/remotely. This has provided the opportunity for many people to live and work in the same location via a new remote working approach and aligns with Welsh Government's 'Smarter Working: a Remote Working Strategy for Wales. The RLDP will also include a policy framework to support job growth from other key employment sectors including retail, leisure and tourism.
- As part of the preparation of the Deposit RLDP an effective and appropriate monitoring framework will be developed and included within the Plan. This will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted RLDP.

## Is there support from the relevant infrastructure providers both financially and in terms of meeting the relevant timescales?

Infrastructure providers are an important component in developing the RLDP and form a key consultee. In this respect they have and will continue to be engaged throughout the Plan making process. Notably further consultation will be undertaken in the preparation of the Deposit Plan to ensure that Plan delivery is fully evidenced. Extensive discussions have taken place between the Council and Dŵr Cymru Welsh Water and NRW to identify workable solutions to the phosphates water quality issue. The outcome of these ongoing discussions has become a central part of the proposed spatial strategy with no new allocations proposed in the upper River Wye Phosphates Catchment area. Other infrastructure providers have also been involved in on-going discussion including Western Power, the Aneurin Bevan University Health Board, Transport for Wales, and the Local Education Authority.

	Will the development be viable?
	Will the development be viable? The need for development to be viable is an important aspect in the preparation of the Plan and will be
	evidenced in relation to the identification of sites or the development of specific policies. Work is currently
	being developed at a regional level to establish a robust and consistent methodology for assessing viability
	across authorities in the south east Wales region. This work sits alongside viability modelling at a site-specific
	level ensuring that viability assessments submitted with candidate sites are appropriately informed by local
	conditions and policy and are robustly evidenced. In seeking to address key local issues such as 50%
	affordable housing delivery on new site allocations and net zero carbon ready homes, it will be essential to
	demonstrate that sites are viable and deliverable. As noted above, this might require Welsh Government's
	policy position changes on use of Social Housing Grant or other public sector funding. Additional viability work will be required to demonstrate site viability and deliverability based on these policy requirements.
	A second call for candidate sites was undertaken over an eight-week period during summer 2021. Detailed
	information on site viability was required as part of this exercise, with a guidance note issued to help
	landowners and developers on the level and type of information required. A Viability Steering Group has
	also been established to inform the viability process and ensure key inputs reflect market conditions in
	Monmouthshire. This site-specific information together with viability modelling will be used to evidence
	that the sites allocated in the Deposit Plan are viable.
	Can the sites allocated be delivered?
•	The Preferred Strategy identifies Preferred Strategic Development Sites for the Primary Settlements of
	Abergavenny, Caldicot and Chepstow through Strategic Policy S7. To inform these Strategic Development
	Sites, a high-level assessment has been undertaken to identify those sites which could contribute to
	delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. These sites have
	provided sufficient evidence of viability and deliverability that will be built on as the Plan progresses. Two
	of the Preferred Strategic Sites are anticipated to provide housing both within and beyond the RLDP plan
	period (Abergavenny East and Caldicot East).
•	Further site-specific allocations will be identified as part of the Deposit plan with their deliverability
	evidenced accordingly.
	is the Dian sufficiently flexible? Are there entropriete contingensies in place?
	Is the Plan sufficiently flexible? Are there appropriate contingencies in place? The Preferred Strategy has been designed to provide a flexible policy framework which is capable of
	providing certainty on how much growth is proposed and its broad distribution, but flexible enough to
	consider appropriate and acceptable opportunities that may arise during the Plan period, such as windfall
	consider appropriate and acceptable opportunities that may arise during the rial period, such as windial

sites and rural enterprise developments. The dwelling and employment land requirement figures contain a flexibility allowance to allow for unforeseen circumstances that may emerge through the Plan period. The flexibility allowance will be given further consideration as part of the Deposit Plan preparation. There is a clear challenge in balancing the environmental constraint of water quality in the River Wye with meeting the identified objectives. Although there is no identified strategic phosphates solution at present for the River Wye, as a contingency it is proposed to include within the settlement boundary three current sites: land at Rockfield Road, Monmouth with planning permission but unable to proceed at present due to phosphates, and two current LDP sites at Drewen Farm, Monmouth and Tudor Road, Wyesham that are unable to proceed due to phosphates. In accordance with the Development Plans Manual, these will be considered as 'bonus sites'.
<ul> <li>Is it monitored effectively?</li> <li>As part of the preparation of the Deposit Plan an effective and appropriate monitoring framework will be developed and included within the Plan and will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted RLDP. In the meantime, a number of annual monitoring exercises will continue to be undertaken to help ensure evidence is up-to-date. This includes the annual housing surveys, Employment and Retail Surveys and preparation of the Adopted LDP Annual Monitoring Reports.</li> </ul>

#### Appendix 1

#### Monmouthshire RLDP Preferred Strategy (December 2022) – General Conformity with Future Wales: The National Plan 2040 Assessment

Future Wales: The National Plan 2040 (referred to as Future Wales from this point on) was published by Welsh Government in February 2021 to promote development that enhances well-being and quality of life in Wales. It considers the issues significant to Wales's prosperity and well-being, such as the economy, housing, transport, energy, and the environment. It identifies where national developments should take place, where the key growth areas are and what infrastructure and services are needed. It is set in the context of a vision that will help deliver sustainable places across Wales by 2040, by supporting placemaking and ensuring our choices direct development to the right places, making the best use of resources, creating and sustaining accessible healthy communities, protecting our environment and supporting prosperity for all.

The requirement for a development plan to be in general conformity with the upper tier statutory development plan in Wales is set out in primary legislation. Planning Policy Wales 11 (February 2021) and the Development Plans Manual (March 2020) provide additional guidance on how to assess general conformity. Paragraph 2.18 of the Development Plans Manual notes that "the fact that a development plan may be inconsistent with one or more polices in the upper tier plan, either directly or through the omission of a policy/proposal, does not, by itself, mean that the plan is not in general conformity. Rather, the fundamental point is how significant the inconsistency is from the point of view of delivery of the upper tier plan". It goes on to note in paragraph 2.19 "whilst it would be acceptable for the lower tier plan to provide further detail in relation to making it more locally distinctive, it fundamentally must not undermine the overarching strategy, policies or proposals in the upper tier plan(s)". The requirement to be in general conformity with Future Wales is also a test of soundness and will be tested through the examination process.

The purpose of this Appendix is to demonstrate that the Monmouthshire's Preferred Strategy (December 2022) assists in the delivery of the Future Wales policies and is in general conformity with its overarching strategy.

The following section assesses whether the RLDP objectives and Strategic Policies set out in the Preferred Strategy are considered to be in general conformity with Future Wales Policies using the traffic light model below:

RLDP/Preferred Strategy is considered to be in general conformity with the Future Wales 2040 policy objective.

RLDP/Preferred Strategy is considered to make a neutral contribution to the Future Wales 2040 policy objective.

RLDP/Preferred Strategy is not considered to be in general conformity with the Future Wales 2040 policy objective.

Future Wales Policy*	Relevant RLDP Objectives and	General Conformity with FW Strategy
	Preferred Strategy Strategic Policies	
Policy 1 – Where Wales will grow	RLDP Objectives:	Monmouthshire is not identified as a growth area in Future
The Welsh Government supports sustainable growth in all parts	Objective 1 – Economic Growth /	Wales, however, the policy allows for growth in towns and
of Wales. In three National Growth Areas there will be growth in	Employment	villages in rural areas of an appropriate scale and to support
employment and housing opportunities and investment in	Objective 6 – Land	local aspiration and need. The Preferred Strategy growth
infrastructure. The National Growth Areas are:	Objective 9 – Demography	level has emerged from an understanding of the issues,
<ul> <li>Cardiff, Newport and the Valleys</li> </ul>	Objective 10 – Housing	challenges and needs of Monmouthshire as well as a sound,
Swansea Bay and Llanelli	Objective 12 – Communities	logical and robust evidence base.
Wrexham and Deeside	Objective 13 – Rural Communities	
The National Growth Areas are complemented by Regional		The Council has considered how best to progress the RLDP
Growth Areas which will grow, develop and offer a variety of	Preferred Strategy Strategic Policies:	having regard to a number of challenges that have arisen
public and commercial services	S1 – Growth Strategy	following stakeholder consultation and engagement on the
at regional scale. There are Regional Growth Areas in three	S2 – Spatial Distribution of	previous Preferred Strategy in summer 2021, namely a Welsh
regions:	Development – Settlement Hierarchy	Government objection on the level of growth set out in the
• The South West	S6 – Affordable Homes	Preferred Strategy and phosphate water quality issues in the
Mid Wales	S7 – Preferred Strategic Site	Rivers Wye and Usk. In response to these challenges four
• The North	Allocations	options were considered by Council on 27 <sup>th</sup> September having
Development and growth in towns and villages in rural areas	S9 – Sustainable Transport	regard to the benefits and risks associated with each. The
should be of appropriate scale and support local aspirations and	S12 – Employment Sites Provision	Report recognises that while the Preferred Strategy would
need.		not deliver key outcomes/address local evidence-based
		issues in the upper River Wye Catchment settlements, it
		would deliver growth (homes and jobs) that 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
		emergencies. The proposed level of growth also represents a
		closer alignment with the level of growth prescribed by Welsh

		Government's July 2021 letter whilst meeting the Council's objectives and meeting the tests of soundness. Although Monmouthshire is not within the national growth area identified in Future Wales 2040: The National Plan, our evidence shows that the proposed level of growth is essential to deliver our local evidence-based issues and objectives and to ensure the RLDP is 'sound'. It is supported by policies 3, 4, 5 and 7, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for wider South East Wales region. On the basis of the evidence prepared to support the Preferred Strategy is it considered the level and distribution of growth proposed is of an appropriate scale to specifically address local aspirations and needs.
<ul> <li>Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking</li> <li>The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.</li> <li>Urban growth and regeneration should be based on the following strategic placemaking principles:</li> <li>creating a rich mix of uses;</li> <li>providing a variety of housing types and tenures;</li> </ul>	RLDP Objectives: Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 8 - Health and Well-being Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural Communities Objective 15 – Accessibility Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies:	The Preferred Strategy's core aim is to deliver sustainable and resilient communities for all. The Strategic Policy Framework seeks to ensure development contributes to the creation of sustainable places that focus on delivering placemaking and ensuring Monmouthshire's communities are sustainable in the long terms and are attractive places to live, work and visit. The policy framework set out in the Preferred Strategy is considered to reflect the policy objectives of the Future Wales policy and provide the basis to make a significant contribution to placemaking objectives at the local level within Monmouthshire.

<ul> <li>building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;</li> <li>increasing population density, with development built at urban densities that can support public transport and local facilities;</li> <li>establishing a permeable network of streets, with a hierarchy that informs the nature of development;</li> <li>promoting a plot-based approach to development, which</li> </ul>	<ul> <li>S3 – Sustainable Placemaking and</li> <li>High Quality Design</li> <li>S9 – Sustainable Transport</li> <li>S11 – Community and Recreation</li> <li>Facilities</li> <li>S17 – Green infrastructure,</li> <li>landscape and Nature Conservation</li> </ul>	The new Preferred Strategy focuses growth on the three principal settlements of Abergavenny, Caldicot and, to a lesser extent, Chepstow. The Strategy identifies three Strategic Development Sites which will deliver sustainable and well-connected urban extensions. The sites will have good walking and cycling links to the respective town centres and railway stations and public transport links. The larger
provides opportunities for the development of small plots,		Abergavenny and Caldicot sites will deliver a mix of uses and
<ul><li>including for custom and self-builders; and</li><li>integrating green infrastructure, informed by the planning</li></ul>		amenities on site.
authority's Green Infrastructure Assessment.		Visions for each town are being developed via regeneration
Planning authorities should use development plans to establish		Placemaking Plans co-produced with the respective Town
a vision for each town and city. This should be supported by a		Council.
spatial framework that guides growth and regeneration, and establishes a structure within which		
towns and cities can grow, evolve, diversify and flourish over		
time.		
Policy 3 – Supporting Urban Growth and Regeneration – Public	RLDP Objectives:	The Preferred Strategy policy framework establishes a new
Sector Leadership	Objective 1 – Economic Growth /	direction for the RLDP to ensure sustainable growth in the
The Welsh Government will play an active, enabling role to	Employment	County, embodying the principles set out in the draft
support the delivery of urban growth and regeneration. The	Objective 10 – Housing	Community and Corporate Plan of tackling inequality,
Welsh Government will assemble land, invest in infrastructure	Objective 11 – Placemaking	protecting our environment and adapting to a world being
and prepare sites for development. We will work with local	Objective 14 – Infrastructure	reshaped by climate change. Monmouthshire County Council
authorities and other public sector bodies to unlock the potential		recognise the significant role it must play in providing public
of their land and support them to take an increased development	RLDP Strategic Policies:	leadership in achieving this aim.
role.	S1 – Growth Strategy	
The public sector must show leadership and apply placemaking	S2 – Spatial Distribution of	To deliver on these key objectives sites to be allocated in the
principles to support growth and regeneration for the benefit of	Development – Settlement Hierarchy	RLDP will need to demonstrate that sites are viable and
communities across Wales.	S3 – Sustainable Placemaking & High	deliverable, having regard to the Council's commitment for
The public sector's use of land, developments, investments and	Quality Design	50% affordable housing provision on new site allocations, the
actions must build sustainable places that improve health and	S5 – Infrastructure Provision	requirement for net zero carbon ready homes and associated
well-being.	S6 – Affordable Homes	infrastructure to ensure the development is sustainable and well-connected. This commitment could have financial

Planning authorities must take a proactive role and work in collaboration with the Welsh Government and other public sector bodies to identify the best locations for growth and regeneration, and provide certainty about how they should be developed.	C C	implications for the Council of reduced land sale receipts and the potential need to CPO sites to bring them forward. It may also require Welsh Government policy position changes on use of Social Housing Grant of other public funding. The suggested approaches are supported by Policy 3 of FW which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. One of the preferred Strategic Development Sites is promoted by a Registered Social Landlord, and another extends onto Council-owned land offering opportunities to deliver affordable housing is a different way.
Policy 4 – Supporting Rural Communities The Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 8 – Health and Well-being Objective 9 – Demography Objective 10 – Housing Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural communities Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High Quality Design S6 – Affordable Homes S9 – Sustainable Transport S13 – Rural Enterprise S14 – Visitor Economy	The issues identified in Policy 4 of Future Wales are directly related to the issues and challenges that the Monmouthshire RLDP is seeking to address. The Preferred Strategy proposes a level and distribution of growth that provides the opportunity to address the County's key issues/challenges including an unbalanced demography, improve labour force retention and out-commuting rates and assist in the County's housing affordability challenge. In this respect the Preferred Strategy is considered to offer a significant contribution to achieving the objectives of Policy 4 of Future Wales whilst also being the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

Policy 5 – Supporting the rural economy	Objective 1 – Economic Growth /	A significant issue for Monmouthshire is the need to sustain
The Welsh Government supports sustainable, appropriate and	Employment	and regenerate the County's rural economy consistent with
proportionate economic growth in rural towns that is planned	Objective 9 – Demography	the policy aims of Policy 5 of Future Wales. The Preferred
and managed through Strategic and Local Development Plans.	Objective 11 – Placemaking	Strategy provides the policy framework to allow for an
Strategic and Local Development Plans must plan positively to	Objective 12 – Communities	appropriate amount of diversification and enterprise in rural
meet the employment needs of rural areas including	Objective 13 – Rural Communities	areas as well as the infrastructure both physical and digital to
employment arising from the foundational economy; the	Objective 16 – Culture, Heritage and	facilitate this. The Preferred Strategy also recognises the role
agricultural and forestry sector, including proposals for	Welsh Language	the agricultural and forestry, tourism and leisure sectors play
diversification; start-ups and micro businesses.		in Monmouthshire's economy and seeks to facilitate their
The Welsh Government also strongly supports development of	RLDP Strategic Policies:	growth at an appropriate scale. The Strategy is supplemented
innovative and emerging technology businesses and sectors to	S1 – Growth Strategy	by a range of evidence and the RLDP will be accompanied by
help rural areas unlock their full potential, broadening the	S2 – Spatial Distribution of	an Economic Development Strategy.
economic base, and creating higher paid jobs.	Development – Settlement Hierarchy	
	S3 – Sustainable Placemaking & High	
	Quality Design	
	S5 - Infrastructure	
	S13 – Rural Enterprise	
	S14 – Visitor Economy	
Policy 6 – Town Centre First	RLDP Objectives:	In accordance with PPW11 the Preferred Strategy sets out the
Significant new commercial, retail, education, health, leisure and	Objective 1 – Economic Growth /	town centre hierarchy for Monmouthshire with a view to
public service facilities must be located within town and city	Employment	sustaining and enhancing the County's main towns as vibrant
centres. They should have good access by public transport to and	Objective 2 – Town and Local	and attractive centres and to maintain their essential
from the whole town or city and, where appropriate, the wider	Centres	functions as attractive places to live and visit and provide a
region.	Objective 11 – Placemaking	valuable role in meeting the needs of local communities. The
A sequential approach must be used to inform the identification	Objective 12 – Communities	hierarchy assists the implementation of the sequential
of the best location for these developments and they should be	Objective 13 Rural Communities	approach and town centre first principle by directing retail,
identified in Strategic and Local Development Plans.	Objective 15 – Accessibility	commercial and social developments, including leisure,
		cultural and entertainment uses to the appropriate position
	RLDP Strategic Policies:	in the hierarchy.
	S1 – Growth Strategy	
	S2 – Spatial Distribution of	At Preferred Strategy stage, only the three Preferred Strategic
	Development – Settlement Hierarchy	Development Sites have been identified. Details of other
		allocations and infrastructure will be contained in the Deposit

	S3 – Sustainable Placemaking & High Quality Design	Plan or accompanying Infrastructure Plan at the next key stage.
	S10 – Town, Local and Neighbourhood Centres	
Policy 7 – Delivering Affordable Homes The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – Demography Objective 10 – Housing Objective 12 – Communities Objective 13 – Rural Communities Preferred Strategy Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S6 – Affordable Homes S7 – Preferred Strategic Site Allocations	Tackling affordability issues in Monmouthshire's housing market has been identified as a key challenge to address through the RLDP process and is a key driver behind the proposed Strategy. Accordingly, the Preferred Strategy establishes a policy framework that seeks to address this through an affordable housing target of between 1,580 – 1,850 affordable homes, commencing work to establish affordable housing percentage thresholds for inclusion in the Deposit Plan and committing to ensuring new site allocations provide for 50% affordable housing. Additional opportunities to increase the supply of affordable housing, such as a housing mix policy will also be explored in the Deposit Plan. As noted in relation to Policy 3, Monmouthshire County Council recognise the significant role it must play in providing public leadership in achieving this aim as well as the role the RLDP plays. The Preferred Strategy sets out the Council's commitment for 50% affordable housing provision on new site allocations. This commitment could have financial implications for the Council of reduced land sale receipts and the potential need to CPO sites to bring them forward. It may also require Welsh Government policy position changes on use of Social Housing Grant of other public funding. The suggested approaches are supported by Policy 3 of FW which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.

Policy 8 – Flooding Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.	RLDP Objectives: Objective 3 - Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 6 – Land Objective 7 – Natural Resources Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S17 – Green Infrastructure, Landscape and Nature Conservation	The latest Local Housing Market Assessment (LHMA) (December 2020) provides the evidence base on affordable housing matters within the RLDP. The Preferred Strategy is underpinned by Objective 4 which seeks 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. Policy S4 of the Strategy makes a policy commitment to avoid locating development in areas at risk of flooding, or where appropriate, minimise the risk of flooding including the incorporation of measures such as Sustainable Urban Drainage Systems and flood resilience design. In accordance with the updated TAN15, we have commissioned a Strategic Flood Consequence Assessment (SFCA) along with other Planning Authorities in the South-East Wales region to inform the preparation of areas most suitable for development and support the identification and safeguarding of areas suitable for sustainable and natural flood management. The Preferred Strategy also recognises the significant role Green Infrastructure plays in flood attenuation and water
Policy 9 – Resilient Ecological Networks and Green	RLDP Objectives:	resource management and managing and enhancing biodiversity and ecosystems resilience. Monmouthshire has significant Green Infrastructure,
Infrastructure		landscape, biodiversity and nature conservation resources.

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to: • identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and • identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built	Objective 3 - Green Infrastructure, Biodiversity and Landscape Objective 4 – Flood Risk Objective 6 – Land Objective 7 – Natural Resources Objective 8 – Health and Well-being Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S17 – Green Infrastructure, Landscape and Nature Conservation	The need to protect and enhance theses resources is a key focus of the RLDP, recognising the multifunctional role it has in delivering active travel, placemaking, ecosystem resilience, climate change mitigation and improving general health and well-being. The Council has prepared the Monmouthshire Green Infrastructure Strategy (2019), which has also informed the evidence base of the SE Wales Area Statement. This provides an overarching framework for positive actions by all stakeholders involved in the future protection, management and enhancement of Green Infrastructure in Monmouthshire and sets out key strategic objectives and priorities for guiding the planning management and delivery of Green Infrastructure in Monmouthshire.
<ul> <li>environment.</li> <li>Policy 10 – International Connectivity The Welsh Government identifies the following Strategic Gateways to facilitate international connectivity: <ul> <li>Cardiff Airport</li> <li>Holyhead Port</li> <li>Haven Waterway, including the Ports of Milford Haven and Pembroke Dock</li> </ul></li></ul>		There are no Strategic Gateways to facilitate international connectivity identified in the Monmouthshire boundary. The RLDP is therefore considered to have a neutral impact on the achieving the Future Wales policy.

<ul> <li>Fishguard Port</li> <li>The Welsh Government will work with the operators, investors and local authorities to support Strategic Gateways and maintain their international connectivity roles.</li> <li>Strategic and Local Development Plans should support the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales.</li> </ul>		
New development around the Strategic Gateways should be		
carefully managed to ensure their operation is not constrained or compromised.		
Policy 11 – National Connectivity R	RLDP Objectives:	The Preferred Strategy seeks to promote sustainable forms of
The Welsh Government will support and invest in improving C national connectivity. Our priorities are to encourage C longer-distance trips to be made by public transport, while also C making longer journeys possible by electric vehicles. The Welsh E Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity: • Rail Network – Transform the rail network and improve the S	Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S5 – Infrastructure Provision S9 – Sustainable Transport	transport, reduce the need to travel, increase provision for walking and cycling and improve public transport provision. The spatial strategy of the RLDP is to focus development in those locations that provide the best opportunities for achieving sustainable development, which offer a choice of transport modes and contribute towards the development of a sustainable transport network and provide opportunities to enhance and connect to the Active Travel Networks. Enhancing the use of ultra-low emission vehicles through the provision of sufficient charging infrastructure is also recognised as a key contributor to improving sustainable national connectivity given Monmouthshire's rural character. The RLDP will promote the concept of the '20-minute neighbourhood'. However, Monmouthshire is predominantly a rural County and as set out in FW Policy 5, it is recognised that there are significant disparities between urban areas with regard to the feasibility of delivering effective public transport systems and active travel routes. Development proposals in rural areas of Monmouthshire should therefore

Planning authorities should support developments associated with improvements to national connectivity and, where		demonstrate innovative solutions to connect rural locations to services and facilities.
appropriate, maximise the opportunities that arise from them. Planning authorities must ensure that, where appropriate, new		The RLDP will also seek to facilitate the Monmouthshire
development contributes towards the improvement and		specific recommendations of the 'South East Wales Transport
development of the National Cycle Network and key links to and		Commission Final Recommendations Plan 2020, which
from it.		recommends the enhancement of the Severn Tunnel Junction
		rail station and access arrangements, and development of a
		walkway station at Magor and Undy.
		The RLDP will therefore plan for strategic development with Monmouthshire's most sustainable locations that have opportunities and potential to connect and link with regional travel aspirations and plans, in particular identified opportunities at Severn Tunnel Junction and the South East Wales Metro scheme. The identified preferred strategic growth areas of Abergavenny East, Bayfield in Chepstow and Caldicot East will be linked to the town centre and railway
		stations via active travel connections.
		An updated Monmouthshire Local Transport Plan taking account of recent key evidence including the South East Wales Transport Commission Final Recommendations Plan: November 2020 and South East Metro will be prepared alongside the preparation of the Deposit Plan. The RLDP will support the transport schemes in identified within the updated LTP, and where appropriate, safeguard land for key transport proposals.
Policy 12 – Regional Connectivity	RLDP Objectives:	The Preferred Strategy seeks to promote sustainable forms of
The Welsh Government will support and invest in improving	Objective 14 – Infrastructure	transport, reduce the need to travel, increase provision for
regional connectivity. In urban areas, to support sustainable	Objective 15 – Accessibility	walking and cycling and improve public transport provision.
growth and regeneration, our priorities are	Objective 17 – Climate and Nature	The spatial strategy of the RLDP aims to focus development in
	Emergency	those locations that provide the best opportunities for

improving and integrating active travel and public transport. In		achieving sustainable development, which offer a choice of
rural areas our priorities are supporting the uptake of ultra-low	RLDP Strategic Policies:	transport modes and contribute towards the development of
emission vehicles and diversifying and	S4 – Climate and Nature Emergency	a sustainable transport network and provide opportunities to
sustaining local bus services.	S5 – Infrastructure Provision	enhance and connect to the Active Travel Networks.
The Welsh Government will work with Transport for Wales, local	S9 – Sustainable Transport	Enhancing the use of ultra-low emission vehicles through the
authorities, operators and partners to deliver the following		provision of sufficient charging infrastructure is also
measures to improve regional connectivity:		recognised as a key contributor to improving sustainable
• Active Travel – Prioritising walking and cycling for all local		national connectivity given Monmouthshire's rural character.
travel. We will support the implementation of the Active Travel		
Act to create comprehensive networks		As noted above the RLDP will also seek to facilitate the
of local walking and cycling routes that connect places that		Monmouthshire specific recommendations of the 'South East
people need to get to for everyday purposes.		Wales Transport Commission Final Recommendations Plan
• Bus – Improve the legislative framework for how local bus		2020, which recommends the enhancement of the Severn
services are planned and delivered. We will invest in the		Tunnel Junction rail station and access arrangements, and
development of integrated regional and local		development of a walkway station at Magor and Undy. It will
bus networks to increase modal share of bus travel and improve		also plan for strategic development with Monmouthshire's
access by bus to a wider range of trip destinations.		most sustainable locations that have opportunities and
Metros – Develop the South East Metro, South West Metro and		potential to connect and link with reginal travel aspirations
North Wales Metro. We will create new integrated transport		and plans, in particular identified opportunities at Severn
systems that provide faster, more		Tunnel Junction and the South East Wales Metro scheme.
frequent and joined-up services using trains, buses and light rail.		The identified preferred strategic site allocations of
• Ultra-Low Emission Vehicles – Support the roll-out of suitable		Abergavenny East, Bayfield and Caldicot East will be linked to
fuelling infrastructure to facilitate the adoption of ultra-low		the town centre and railway stations via active travel
emission vehicles, particularly in rural areas.		connections.
Planning authorities must plan the growth and regeneration of		
the National and Regional Growth Areas to maximise		An updated Monmouthshire Local Transport Plan taking
opportunities arising from the investment in public transport,		account of recent key evidence including the South East
including identifying opportunities for higher density, mixed-use		Wales Transport Commission Final Recommendations Plan:
and car-free development around metro stations.		November 2020 and South East Metro will be prepared
Active travel must be an essential and integral component of all		alongside the preparation of the Deposit Plan. The RLDP will
new developments, large and small. Planning authorities must		support the transport schemes in identified within the
integrate site allocations, new development and infrastructure		updated LTP, and where appropriate, safeguard land for key
with active travel networks and, where appropriate, ensure new		transport proposals.

development contributes towards their expansion and		
improvement.		
Planning authorities must act to reduce levels of car parking in		
urban areas, including supporting car-free developments in		
accessible locations and developments with car parking spaces		
that allow them to be converted to other uses over time. Where		
car parking is provided for new non-residential development,		
planning authorities should seek a minimum of 10% of car		
parking spaces to have electric vehicle charging points		
Policy 13 – Supporting Digital Communications	RLDP Objectives:	Given Monmouthshire's rural character, the RLDP recognises
The Welsh Government supports the provision of digital	Objective 14 - Infrastructure	the importance of ensuring the provision of adequate digital
communications infrastructure and services across Wales.		infrastructure to enhancing the County's economic and
Planning authorities must engage with digital infrastructure	RLDP Strategic Policies:	community connectivity and communication needs and
providers to identify the future needs of their area and set out	S5 – Infrastructure Provision	reducing the need to travel.
policies in Strategic and Local Development Plans to help deliver		
this.		
New developments should include the provision of Gigabit		
capable broadband infrastructure from the outset.		
Policy 14 – Planning in Mobile Action Zones	RLDP Objectives:	Future Wales does not identify the Mobile Action Zones at
The Welsh Government supports increased mobile phone	Objective 14 - Infrastructure	this stage. The RLDP is therefore considered to have a neutral
coverage and the associated economic and social benefits it		impact on achieving the policy aims. This will be reviewed
brings.	RLDP Strategic Policies:	once the Mobile Action Zones are published.
The Welsh Government will identify Mobile Action Zones,	S5 – Infrastructure Provision	
showing locations where there is little or no mobile		
telecommunications coverage.		
The Welsh Government, planning authorities and mobile		
telecommunications operators must work together to achieve		
increases in mobile coverage within Mobile Action Zones.		
Policy 15 – National Forest	RLDP Objectives:	Future Wales does not identify the location(s) of the
The Welsh Government is committed to developing a national	Objective 3 - Green Infrastructure,	proposed national forest. However, Welsh Government
forest through the identification of appropriate sites and	Biodiversity and Landscape	identify 14 National Forest Sites that are part of its estate and
mechanisms. Action to safeguard proposed	Objective 4 – Flood Risk	managed and maintained by Natural Resources Wales, two of
locations for the national forest will be supported.	Objective 6 – Land	which are within Monmouthshire's boundary – Wentwood

	Objective 7 – Natural Resources Objective 8 – Health and Well-being Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S17 – Green Infrastructure, Landscape and Nature Conservation	Forest and Wye Valley Woodlands. Work is ongoing by Welsh Government to identify additional sites. Policy S17 of the Preferred Strategy is supportive of protecting and enhancing Green Infrastructure assets within the County consistent with the aims of Policy 15 of FW.
Policy 16 – Heat Networks Within Priority Areas for District Heat Networks planning authorities should identify opportunities for District Heat Networks and plan positively for their implementation. Large scale mixed-use development should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. Planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.	RLDP Objectives: Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change	There are no Priority Areas for District Heat Networks identified within the Monmouthshire boundary within Future Wales. The RLDP does, however, establish the strategic policy framework to support the development of renewable and low/zero carbon energy generation. A Renewable and Low Carbon Energy Assessment of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and will inform the Deposit Plan in terms of specific local search areas for the potential for types of renewable and low/zero carbon energy. The assessment reviews the potential for District Heat Networks in Monmouthshire and concludes that there is very little potential for financially viable traditional heat networks (50 kWh/m <sup>2</sup> and greater). This corresponds with the Welsh Government's heat mapping for Future Wales.
Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure The Welsh Government strongly supports the principle of	RLDP Objectives: Objective 17 – Climate and Nature Emergency	There are no Pre-Assessed Areas for Wind Energy within the Monmouthshire boundary within Future Wales. Consistent with Policy 17 of Future Wales the RLDP does, however,
developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.	RLDP Strategic Policies: S4 – Climate Change	establish the policy framework for developing renewable and low carbon energy from all technologies through Strategic Policy S4 – Climate Change. An assessment of the potential
In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales'		for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and will inform the Deposit Plan in terms of identifying local search areas for

international commitments and our target to generate 70% of	different types of renewable and low/zero carbon energy.
consumed electricity by renewable means by 2030 in order to	Consistent with FW, the Renewable and Low Carbon Energy
combat the climate emergency.	Assessment concludes that there is limited wind resource in
In Pre-Assessed Areas for Wind Energy the Welsh Government	Monmouthshire. It does, however, identify significant solar
has already modelled the likely impact on the landscape and has	resource. Further work will be undertaken to refine the
found them to be capable of accommodating development in an	potential solar resource to identify local search areas in the
acceptable way. There is a presumption in favour of large-scale	Deposit Plan and establish local renewable energy generation
wind energy development (including repowering) in these areas,	targets.
subject to the criteria in policy 18.	
Applications for large-scale wind and solar will not be permitted	
in National Parks and Areas of Outstanding Natural Beauty and	
all proposals should demonstrate	
that they will not have an unacceptable adverse impact on the	
environment.	
Proposals should describe the net benefits the scheme will bring	
in terms of social, economic, environmental and cultural	
improvements to local communities.	
New strategic grid infrastructure for the transmission and	
distribution of energy should be designed to minimise visual	
impact on nearby communities. The Welsh Government will	
work with stakeholders, including National Grid and Distribution	
Network Operators, to transition to a multi-vector grid network	
and reduce the barriers to the implementation of new grid	
infrastructure.	
Policy 18 – Renewable and Low Carbon Energy Developments	Policy 18 of Future Wales sets out the criteria Welsh
of National Significance	Government will use to assess renewable and low carbon
Proposals for renewable and low carbon energy projects	energy developments of national significance. The RLDP is
(including repowering) qualifying as Developments of National	therefore considered to have a neutral impact on its delivery
Significance will be permitted subject to	as it is not Monmouthshire's policy framework being used to
policy 17 and the following criteria:	determine the proposals.
1. outside of the Pre-Assessed Areas for wind developments and	
everywhere for all other technologies, the proposal does not	Recent appeal and Ministerial decisions prioritise the
have an unacceptable adverse impact on the surrounding	safeguarding of best and most versatile agricultural land over

landscape (particularly on the setting of National Parks and Areas	the temporary use for renewable energy generation such as
of Outstanding Natural Beauty);	solar farms. Given the extent of BMV agricultural land in
2. there are no unacceptable adverse visual impacts on nearby	Monmouthshire this approach significantly reduces the
communities and individual dwellings;	amount of land potentially available for renewable energy
3. there are no adverse effects on the integrity of Internationally	development and presents a challenge to the Council meeting
designated sites (including National Site Network sites and	its requirement to be net carbon neutral by 2030.
Ramsar sites) and the features for which they have been	
designated (unless there are no alternative solutions, Imperative	
Reasons of Overriding Public Interest (IROPI) and appropriate	
compensatory measures have been secured);	
4. there are no unacceptable adverse impacts on national	
statutory designated sites for nature conservation (and the	
features for which they have been designated), protected	
habitats and species;	
5. the proposal includes biodiversity enhancement measures to	
provide a net benefit for biodiversity;	
6. there are no unacceptable adverse impacts on statutorily	
protected built heritage assets;	
7. there are no unacceptable adverse impacts by way of shadow	
flicker, noise, reflected light, air quality or electromagnetic	
disturbance;	
8. there are no unacceptable impacts on the operations of	
defence facilities and operations (including aviation and radar)	
or the Mid Wales Low Flying Tactical Training Area (TTA-7T);	
9. there are no unacceptable adverse impacts on the transport	
network through the transportation of components or source	
fuels during its construction and/or ongoing operation;	
10. the proposal includes consideration of the materials needed	
or generated by the development to ensure the sustainable use	
and management of resources;	
11. there are acceptable provisions relating to the	
decommissioning of the development at the end of its lifetime,	
including the removal of infrastructure and effective restoration.	

The cumulative impacts of existing and consented renewable energy schemes should also be considered.         RLDP Objectives:           Policy 19 - Strategic Policies for Regional Planning Strategic Development Plans should embed placemaking as an overarching principle and should estabilish for the region where required constituent Local Development Plans):         RLDP Objectives:         The preparation of the Preferred Strategy has also involved a regional and coordinated approach to the collection of woreaching provision and requirement;           1. a spatial strategy;         Dejective 1 - Housing         Habitat Regulations Assessment. This has provided a consistent and comparable approach to the collection of employment trudy. Renewable and Low Carbon Energy Assessment and Integrated Sustainability Assessment and cast the majory and traveller need;           3. the housing provision and requirement; 4. the gyps and traveller need;         Objective 10 - Housing Dipective 10 - Housing         Alabitat Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a sis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will 5.1 - Growth Strategy 3.1 - Infrastructure Provision 7. the identification of green belts, green corridors and nationally infrastructure;         Development - Settlement Hierarchy 5.2 - Employment Sites Provision 7.5 - Sustainable Transport 5.1 - Employment Sites Provision 7.5 - Sustainable Transport 5.1 - Condical networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and 1.1 a. co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal. The Webkh Government requires the adoption of Str		-	
Policy 19 - Strategic Policies for Regional Planning       RLDP Objectives:       The preparation of the Preferred Strategy has also involved a vertaching principle and should estabilish for the region (and coordinated approach to the collection of verarching principle and should estabilish for the region (and coverlanced approach to the collection of verarching principle and should estabilish for the region (and coverlanced approach to the collection of veridence and any input to the submitting the preparation of the Preferred Strategy has also involved a very construct to the collection of objective 1 - Natural Resources objective 10 - Housing objective 10 - Housing objective 14 - Infrastructure       The preparation of the Preferred Strategy has also involved a regional and coordinated approach to the collection of very construct to the collection of objective 10 - Housing objective 10 - Housing objective 14 - Infrastructure         3. the housing provision and requirement;       Objective 14 - Infrastructure       Disective 14 - Infrastructure         4. the gyps and travelier need;       S1 - Strategic Policies:       The preparation of the Preferred Strategy has also involved a substantial evidence and any implications on a more regional basis as well as at a local level. This approach will continue through the preparation of the Deposit Plan, with a and nerewable energy;         5. the employment form of green belts, green corridors and nationally important landscapes where required;       S2 - Spatial Distribution of Development Stee Provision S15 - Sustainable Transport and concentity;       S2 - Spatial	The cumulative impacts of existing and consented renewable		
Strategic Development Plans should embed placemaking as an overacthing principle and should establish for the region (and where required constituent Local Development Plans):       Objective 1 – Economic Growth / Employment       regional and coordinated approach to the collection of evidence, including population projection modelling, regional where required constituent Local Development Plans):         1. a spatial strategy;       Objective 7 – Natural Resources       Objective 7 – Natural Resources         2. a settlement hierarchy;       Objective 7 – Natural Resources       Objective 1 – Infrastructure         3. the housing provision and requirement;       Objective 1 – Infrastructure       Consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will sapproach will s	energy schemes should also be considered.		
overarching principle and should establish for the region (and where required constituent Local Development Plans):Employment Objective 5 – Matural Resources Objective 10 – Housingevidence, including population projection modelling, regional employment study, Renewable and Low Carbon Energy Assessment and Integrated Sustainability Assessment and Habitats Regulations Assessment and Integrated Sustainability Assessment and consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will 51 – Growth Strategic Policy 33 – National Growth Area – Cardiff, Newport and tast regions.Employment operation of the South East region.Objective 10 – Housing Objective 10 – Housing Objective 10 – Housing Objective 10 – Housing Objective 14 – Infrastructure s – Spatial Distribution of prevelopment provision S – Spatial Distribution of prevelopment and severation of the sustainable management of natural severes and cultural assets; S10 – Soutainable Transport S16 – MineralsRLDP Objectives: Objective 14 – Infrastructure Provision S3 – Infrastructure Provision S3 – Infrastructure Provision S16 – MineralsNomouthshire is not identified as a growth area in Future Wedge Review. Long standing regional working methods associated with areas such as avaste and minerals are continued and reflected in the Prefered Strategy.Nomouthshire is not identified as a growth area in Future Wider region which addresses the opportunities of opprent in the south East regions.RLDP Objectives: Objective 1 – Economic Growth / Employment Strategic Dipctive 9 – DemographyMonmouthshire is not identified as a growth area in Future Wedge Review. Long Storegic and Local Development Plan	Policy 19 – Strategic Policies for Regional Planning	RLDP Objectives:	The preparation of the Preferred Strategy has also involved a
where required constituent Local Development Plans):Objective 5 – Minerals and Waste1. a spatial strategy;Objective 7 – Natural Resources2. a settlement hierarchy;Objective 10 – Housing3. the housing provision and requirement;Objective 10 – Housing4. the gypsy and traveller need;Objective 14 – Infrastructure5. the employment provision;RLDP Strategic Policies:6. the spatial areas for strategic housing, employment growthS1 – Growth Strategy7. the identification of green belts, green corridors and nationallyDevelopment – Settlement Hierarchy8. the location of key services, transport and connectivityS1 – Growth Strategy9. a framework for the sustainable management of naturalS2 – Spatial Distribution of9. a framework for the sustainable management of green infrastructure;S1 – Employment Tistes Provision9. a framework for the sustainable management of green infrastructure; andS16 - Minerals9. a cordinated framework for minerals extraction and the circular economy, including waste treatment and disposal.S16 - MineralsThe Welsh Government requires the adoption of StrategicSuth Rate gions.Policy 33 - National Growth Area - Cardiff, Newport and the Valleys will be the main focus of grown And investment in the South East region.RLDP Objectives:Objective 6 - LandObjective 6 - Land	Strategic Development Plans should embed placemaking as an	Objective 1 – Economic Growth /	regional and coordinated approach to the collection of
1. a spatial strategy;       Objective 7 – Natural Resources       Assessment and Integrated Sustainability Assessment and Development Provision;         3. the housing provision and requirement;       Objective 10 – Housing       Assessment and Integrated Sustainability Assessment and Development Provision;         6. the spatial areas for strategic housing, employment growth and investment in the North, Mid Wales, South West and South East regions.       Constructive Provision;       Assessment and Integrated Sustainability Assessment and Development Provision;         7. the identification of green belts, green corridors and nationally important landscapes where required;       Sustainability Assessment and Integrated Sustainability Assessment and reen evidence and any implications on a more         8. the location of key services, transport and connectivity infrastructure;       Sa – Spatial Distribution of natural Size – Spatial Distribution of natural sets;       Development Sites Provision         10. ecological networks and opportunities for protecting of green infrastructure; and       Size – Spatial Distribution of Strategic       This regional approach to many of the policy areas covered in the RLDP will provide a substantial evidence base for the opolicy areas covered in the Caroling waste treatment and disposal.         11. a co-ordinated framework for minerals extraction and the caregions.       RLDP Objectives:       Monmouthshire is not identified as a growth area in Future         Objective 7 – Natural Resources       Objective 6 – Land       Objective 6 – Land       Monmouthshire is not identified as a growth area in Future </td <td>overarching principle and should establish for the region (and</td> <td>Employment</td> <td>evidence, including population projection modelling, regional</td>	overarching principle and should establish for the region (and	Employment	evidence, including population projection modelling, regional
2. a settlement hierarchy;Objective 10 – HousingHabitats Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more sets the amployment provision;3. the spatial areas for strategic housing, employment growth and renewable energy;RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Infrastructure ProvisionHabitats Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will s2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Infrastructure Provision S3 – Cypsy and Travellers S9 – Sustainable Transport S12 – Employment Sites Provision S15 – Sustainable Waste Management S16 - MineralsHabitats Regulations Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis as well as at a local level. This approach will socotinue through the preparation of the Deposit Plan, with a socoted and reflected in the Deposit Plan, with a S2 – Spatial Distribution of S3 – Sustainable Transport S3 – Sustainable Waste Management S16 - MineralsHabitats Regulations Assessment. This has provided a consistent and comparable approach to implications on a more regional basis to consider to mute of jointly commissioned pieces of evidence already in progress including a Development Viability Model, a Strategic Discutive 1 – forowth Area – Cardiff, Newport and the circular economy, including waste treatment and disposal. The Welsh Government requires the adoption	where required constituent Local Development Plans):	Objective 5 – Minerals and Waste	employment study, Renewable and Low Carbon Energy
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<ul> <li>infrastructure;</li> <li>a framework for the sustainable management of natural resources and cultural assets;</li> <li>10. ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and</li> <li>11. a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal. The Welsh Government requires the adoption of Strategic Development Plans in the North, Mid Wales, South West and South East regions.</li> <li>Policy 33 – National Growth Area – Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region.</li> <li>Substainable Transport Sites Provision Site Policy areas covered in Substantial evidence base for the North / Employment Circular - Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region.</li> <li>RLDP Objective 5 – Land Objective 9 – Demography</li> <li>Substainable Transport Sites Provision Site Policy areas such as waste and minerals are continued and reflected in the Preferred Strategy. Site – Sustainable Waste</li> <li>Management Site Provision of the south East SDP.</li> <li>This regional approach to many of the policy areas covered in the RLDP will provide a substantial evidence base for the preparation of the South East SDP.</li> <li>Monmouthshire is not identified as a growth area in Future Wales, however, the policy supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region. The background evidence to</li> </ul>	important landscapes where required;	S3 – Infrastructure Provision	Flood Consequence Assessment and Green Belt and Green
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circular economy, including waste treatment and disposal. The Welsh Government requires the adoption of Strategic Development Plans in the North, Mid Wales, South West and South East regions.Additional Growth Area – Cardiff, Newport and the Objectives: Objective 1 – Economic Growth / Employment Objective 6 – Land Objective 9 – DemographyMonmouthshire is not identified as a growth area in Future Wales, however, the policy supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region. The background evidence to	of green infrastructure; and		preparation of the South East SDP.
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ValleysObjective 1 – Economic Growth / EmploymentWales, however, the policy supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region. The background evidence to	South East regions.		
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Strategic and Local Development Plans should recognise the Objective 9 – Demography its functions as a Capital Region. The background evidence to	Cardiff, Newport and the Valleys will be the main focus for	Employment	wider region which addresses the opportunities and
	growth and investment in the South East region.	Objective 6 – Land	challenges arising from the region's geographic location and
National Growth Area as the focus for strategic economic and Objective 10 – Housing the Preferred Strategy shows that the proposed level of	Strategic and Local Development Plans should recognise the	Objective 9 – Demography	its functions as a Capital Region. The background evidence to
	National Growth Area as the focus for strategic economic and	Objective 10 – Housing	the Preferred Strategy shows that the proposed level of

housing growth; essential services and facilities; advanced	Objective 12 – Communities	growth is essential to deliver our local evidence-based issues
manufacturing; transport and digital infrastructure.	Objective 13 – Rural Communities	and objectives and ensure the RLDP is 'sound' in respect of all
The Welsh Government will work with regional bodies and local		tests of soundness. The RLDP growth strategy will assist in
authorities in the region and in neighbouring regions of England	Preferred Strategy Strategic Policies:	addressing our core issues without harming or compromising
to promote and enhance Cardiff, Newport and the Valleys'	S1 – Growth Strategy	Welsh Government's objectives for the wider South Wales
strategic role and ensure key investment decisions support	S2 – Spatial Distribution of	region.
places in the National Growth Area and the wider region.	Development – Settlement Hierarchy	
The Welsh Government supports Cardiff's status as an	S6 – Affordable Homes	The Preferred Strategy seeks to build on Monmouthshire's
internationally competitive city and a core city on the UK stage.	S7 – Preferred Strategic Site	key strategic location that benefits from good links to Cardiff,
Cardiff will retain and extend its role as the primary national	Allocations	Bristol and the Midlands. The RLDP recognises that given
centre for culture, sport, leisure, media, the night time economy	S9 – Sustainable Transport	Monmouthshire position as the gateway to Wales combined
and finance.	S12 – Employment Sites Provision	with the wider opportunities associate with the Cardiff
The Welsh Government supports an increased strategic role for		Capital Region City Deal, South East Wales Metro and the
Newport as a focus for sustainable, long-term growth and		County's strategic location between the Great Western Cities
investment. The Welsh Government will work with authorities		of Cardiff, Newport and Bristol, the County has potential to
within the region and in England to promote Newport's strategic		contribute to the aims for the wider region.
role and ensure key investment decisions in Wales and England		
support Newport.		Additional comments are set out in relation to FW Policy 1
The Welsh Government supports co-ordinated regeneration and		above.
investment in the Valleys area to improve well-being, increase		
prosperity and address social inequalities. The Welsh		
Government will work with regional bodies, local authorities,		
businesses, the third sector, agencies and stakeholders to		
support investment, including in the manufacturing sector, and		
to ensure a regional approach is taken to addressing		
socio-economic issues in the Valleys.		
The Welsh Government supports development in the wider		
region which addresses the opportunities and challenges arising		
from the region's geographic location and its functions as a		
Capital Region.		
Policy 34 – Green Belts in the South East	RLDP Objectives:	The South East Wales Regional Strategic Diagram (page 163
	Objective 3 – Green Infrastructure,	of Future Wales) provides an indicative plan of the area for
	Biodiversity and Landscape	consideration with the detailed boundary to be defined

The Welch Covernment or subscripts the Covernment of Decision	Objective C. Level	through the managemetics of the CDD through the con-
The Welsh Government requires the Strategic Development Plan	Objective 6 – Land	through the preparation of the SDP. In advance of an SDP,
to identify a green belt to the north of Cardiff, Newport and the		the area shown for consideration in Future Wales should be
eastern part of the region to manage urban form and growth.	RDLP Strategic Policies:	treated as a designated Green Belt. In assessing the spatial
The Strategic Development Plan must consider the relationship	S2 – Spatial Distribution of	strategy for distributing growth within the County
of the green belts with the green belt in the West of England.	Development – Settlement Hierarchy	consideration has be given to paragraph 3.72 of PPW11 which
Local Development Plans and development management	S7 – Preferred Strategic Site	states that:
decisions should not permit major development in the areas	Allocations	"when considering a Green Belt designation, a sufficient range
shown for consideration for green belts, except in very	S17 – Green Infrastructure,	of development land which is suitably located in relation to
exceptional circumstances, until the need for green belts and	Landscape and Nature Conservation	the existing urban edge should be made available, having
their boundaries has been established by an adopted Strategic		regard to the longer term need for development land, the
Development Plan.		effects of development pressures in areas beyond the Green
		Belt and the need to minimise demand for travel. This may
		require land to be safeguarded, and boundaries of proposed
		Green Belts must be carefully defined to achieve this".
		In this respect, the Preferred Strategy is considered to
		facilitate the identification of a green belt in southern
		Monmouthshire with the primary settlements situated
		outside the broad designation, consistent with the indicative
		plan and meeting the aims of Policy 34 but allowing for an
		appropriate level of growth in Monmouthshire to address its
		local challenges and issues. A Green Belt and Green Wedge
		review had been commissioned on a sub-regional basis to
		inform the evidence base of the RLDPs and the South East
		Wales SDP. The Council still has significant concerns,
		however, regarding the Green Belt designation as a
		permanent designation that would have long-term policy
		implications for future growth and prosperity in
		Monmouthshire.
Policy 25 Valloys Perional Park		
Policy 35 – Valleys Regional Park		Policy 35 – Valleys Regional Park is not considered to be
The Welsh Government supports the establishment of the		directly related to Monmouthshire. The Preferred Strategy is
Valleys Regional Park.		therefore considered to have a neutral impact of achieving its
		aims.

Strategic and Local Development Plans should embed its		
principles into their planning frameworks. The Welsh		
Government will work with local authorities, the third sector and		
key partners to support the Valleys Regional Park and maximise		
opportunities for new development.		
Policy 36 – South East Metro	RLDP Objectives:	Preferred Strategy Policy S9 – Sustainable Transport, sets out
The Welsh Government supports the development of the South	Objective 14 – Infrastructure	the policy framework to promote sustainable travel in the
East Metro and will work with Transport for Wales, local	Objective 15 – Accessibility	County with specific reference to developing the role of
authorities and other partners to enable its	Objective 17 – Climate and Nature	Monmouthshire's Primary settlements in accordance with
delivery and maximise associated opportunities.	Emergency	the South East Wales Regional Plan and Monmouthshire's
Strategic and Local Development Plans must support the South		Local Transport Plan around which low carbon sustainable
East Metro. Planning authorities should plan growth and	RLDP Strategic Policies:	transport opportunities can be developed and linked to the
regeneration to maximise the opportunities arising from better	S4 – Climate Change	South East Wales Metro. The Preferred Strategy identifies
regional connectivity, including identifying opportunities for	S5 – Infrastructure Provision	Preferred Strategic Site Allocations within Monmouthshire's
higher density, mixed-use and car-free development around	S9 – Sustainable Transport	most sustainable locations that have opportunities and
new and improved metro stations.		potential to connect and link with regional travel aspirations,
		in particular identified opportunities at Severn Tunnel
		Junction and the South East Wales Metro Scheme.
		An updated Monmouthshire Local Transport Plan taking
		account of recent key evidence including the South East
		Wales Transport Commission Final Recommendations Plan:
		November 2020 and South East Metro will be prepared
		alongside the preparation of the Deposit Plan. The RLDP will
		support the transport schemes in identified within the
		updated LTP, and where appropriate, safeguard land for key
		transport proposals.

\*Table excludes FW Policies 20 – 32 as these cover the north west and south west regions

#### Conclusion

#### Monmouthshire Replacement Local Development Plan Self-Assessment of the Preferred Strategy against the Tests of Soundness

As the assessment above demonstrates, the Preferred Strategy aligns with the objectives of Future Wales and establishes a policy framework that is in general conformity with Future Wales and makes a positive contribution to its policy aims. At a local and regional level, the RLDP is well-placed to implement the vision and objectives of Future Wales by ensuring that it includes policies that adhere to principles of placemaking and sustainable development.

Future Wales includes policy provisions for issues at a national level such as International Connectivity and Renewable and Low Carbon Energy Developments of National Significance. These are shown in yellow above, to indicate that the Preferred Strategy makes a neutral contribution to these areas. Similarly, a neutral affect is indicated for policies areas where locations are yet to be published such as Planning Mobile Action Zones and Policy 35 relating to the Valleys Regional Park which is not directly relevant to Monmouthshire. Whilst the RLDP does not directly include provisions for these issues, they are not considered to have a material impact on the ability of the RLDP to align with the over-arching vision and objectives of Future Wales.