



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Background Paper:

Self-Assessment of the Deposit Plan against
the Tests of Soundness

October 2024



monmouthshire
sir fynwy

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Self-Assessment of the Deposit Plan against the Tests of Soundness

1. Introduction

- 1.1. This paper is one of a series produced by Monmouthshire County Council (MCC) as part of the evidence base for the Replacement Local Development Plan (RLDP) which covers the period 2018 – 2033. 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 Deposit Plan 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 Deposit Plan and the 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 to an independent Examination by a Planning Inspector.
- 1.4. The Council's self-assessment of the Deposit Plan is set out below.

2. Self-assessment of the Deposit Plan against the Tests of Soundness

Test 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 Deposit stage of the Replacement Local Development Plan process.
Preparation Requirements: - Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?) - Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? (when published or adopted respectively)	Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?) The Deposit Plan has been prepared in accordance with the procedural requirements. Notable reference should be had to the publication of the Integrated Sustainability Appraisal (ISA) (2024) and the Habitats Regulations Assessment (HRA) Report (2024) which have been published as supporting documents to the Deposit Plan. 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), Initial Integrated Sustainability Appraisal (ISA) for the Monmouthshire RLDP (Nov 2022) and Initial Habitats Regulations Assessment Screening Report (December 2018) and Habitats Regulations Assessment of the Monmouthshire RLDP Preferred Strategy (Nov 2022). 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 will be available on the Council’s website. Prior to the consultation on the Deposit Plan, 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 2 of the Deposit Plan. Full details of the consultation methods undertaken are set out in the Initial Consultation Report which accompanies the Deposit Plan. Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? 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 policy framework for SDPs and LDPs, with a requirement for the lower tier plans to be in general conformity with Future Wales. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a ‘green’ rating and noting that <i>“Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</i> In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government. The proposed level of growth set out in the Deposit Plan 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 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 and not undermining the prospects of surrounding local authorities or the ambitions for the National Growth Area of the Cardiff Capital Region. Conversely, a lower level of growth would not address the local evidence-based issues and objectives and would therefore fail the tests of soundness.
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	Spatially, the RLDP preparation process has reflected the policies of Future Wales and again Welsh Government noted in its response the Preferred Strategy that it does not object to the settlement hierarchy and distribution of housing growth. 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 been given to paragraph 3.72 of PPW12 which states that: <i>“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”.</i>
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	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. In this respect, the Deposit Plan 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. More generally, the overarching policy framework of the Deposit Plan 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 Deposit Plan is considered to set the policy framework for delivering the policy objectives of Future Wales at a local level. The RDLP provides an opportunity for public sector leadership (Policy 3), with the Caldicot East Strategic Development Site (Policy HA2) 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 Section 3 of this paper.
Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?) Questions Does it have regard to national policy (PPW) and Future Wales?	The formulation of the Deposit Plan 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 Plan 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

• Does it have regard to Well-being Goals? • Does it have regard the Welsh National Marine Plan? • Does it have regard to the relevant Area Statement? • Is the plan in general conformity with the NDF? • Is the plan in general conformity with relevant SDP (when adopted)? • Is it consistent with regional plans, strategies and utility programmes? • Is it compatible with the plans of neighbouring LPAs? • Does it reflect the Single Integrated Plan (SIP) Well-being Plan or the National Park Management Plan (NPMP)? • Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?	considered and have subsequently informed the Strategy, Strategic Policies and associated Development Management Policies. Each of the Test 1 questions is discussed in turn: National Policy (PPW12) and Future Wales The Deposit Plan has regard to national policies and guidance as set out in PPW12 and associated Technical Advice Notes (TANs). The RLDP and supporting documents refer to relevant sections of PPW12 specific to the issue being discussed and the policy requirements of PPW12 have been considered and incorporated where relevant in the preparation of the Strategic Policies and detailed Development Management policies. The supporting text adds further commentary on the links to national guidance. Each of the Strategic Policies is supported by a policy context section which sets out links to the wider policy framework including PPW12 and TANs. The relationship between the Deposit Plan and Future Wales is discussed above and in Section 3 of this Paper. The RLDP is recognised as a key mechanism in delivering the planning policy priorities identified in national policy. Well-Being Goals The Deposit Plan 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-statutory consultation and engagement undertaken on the Issues, Vision and Objectives, the Growth and Spatial Options Papers and the Preferred Strategy stage of the plan process. 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 goal 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.
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	Welsh National Marine Plan The Strategic Policies and associated Development Management 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 S5 – 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 is enhanced further through the detailed policies in the Deposit Plan. For example, policies NR2 – Severn Estuary Recreational Pressure, which seeks to ensure that there are no adverse impacts on the integrity of the Severn Estuary SAC, SPA and Ramsar as a result of an increase in visitor pressures and NR3 – Protection of Water Sources and the Water Environment, which looks to ensure development does impact upon quality and quantity of water sources. As such, the policy framework 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 Deposit Plan 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 S5 – 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,
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the Deposit Plan 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 Section 3 of this Paper.

Strategic Development Plan (SDP)

The preparation of an SDP has not yet formally commenced for the region, however, consultation on a Delivery Agreement is anticipated to be undertaken towards the end of 2024. 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 Deposit Plan has been prepared within the context of the relevant regional plans, strategies and utility provider programmes, with Appendix 3 of the Plan, associated background papers and the supporting commentary of the strategic and detailed policies providing details of the documents that have been considered. Specific reference is made to the regional assessment of future growth and migration for the Cardiff Capital Region (CCR). This report aims to review how each LPA could contribute towards increasing the number of jobs across the region by 2040 and how the increase in jobs corresponds with projected growth in LPAs, the region and Future Wales 2040. It reviews the migration assumptions underpinning the proposed level of population/jobs growth and the potential implications of the spatial distribution of jobs and people on travel patterns. The study provides a policy-off approach to the assessment of potential growth in the region. As such, it sits alongside and complements RDLP evidence prepared by each authority in the region. It is not intended to replace or supersede the detailed consideration of growth potential prepared by individual authorities to inform the RLDP process.

	The Initial Sustainability Assessment and Habitats Regulations Assessment also consider the in-combination effects of the Plan along with other plans and strategies in the region and conclude that the Plan is in line with both regional and local environmental protection objectives. The preparation of the Deposit Plan has also involved a regional and coordinated approach to the collection of evidence, including population projection modelling and regional employment study, Development Viability Model, Renewable Energy Assessment and Strategic Flood Consequence 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. Long standing regional working methods associated with areas such as waste and minerals are continued and are reflected in the Deposit Plan. Utility companies have been involved from an early stage in the development of the RLDP to ensure consistency with their programmes. For example, extensive discussions have taken place between the Council and Dŵr Cymru Welsh Water to identify solutions to the phosphates constraint affecting the County, as well as other utility companies such as Western Power to understand capacity for growth and for renewable energy. Plans of Neighbouring Authorities (LPAs) The Deposit Plan 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 Plan. As noted above, in recognition of the value of working with neighbouring authorities, and in response to PPW12 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:
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	regional assessment of future growth and migration for the Cardiff Capital Region (CCR), a Larger than Local Employment Study, Population and Household Projections, Integrated Sustainability Appraisal, Habitats Regulation Assessment, Development Viability Model and Renewable Energy Assessment. In addition, work undertaken by SEWSPG and topic-based Pathfinder groups, 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) In 2021 a new Gwent wide well-being Public Service Board (PSB) was established replacing the five separate Public Service Boards in the Gwent region (Blaenau Gwent, Caerphilly, Newport, Monmouthshire and Torfaen), forming the Gwent PSB. The Gwent PSB Well-Being Plan was published in 2023 and sets out what the PSB could do over the next five years to tackle the social, economic, environmental and cultural issues which can affect well-being in Gwent. The Well-Being Plan contains two main objectives; to create a fairer, more equitable and inclusive Gwent for all and a climate-ready Gwent, where our environment is valued and protected, benefitting our well-being now and for future generations. The Well-Being Plan then identifies five steps that will help to achieve the two well-being objectives. The RLDP objectives as shown in Table 1 of the Deposit Plan sets out the Gwent PSB Well-Being Plan steps that are considered to correspond with the RLDP objective to illustrate where the two align and illustrate how the RLDP will help to deliver on the Gwent PSB Well-Being Plan. The Strategic Policies also set out which of the Well-being Plan objectives it has a particular link to. Prior to the formulation of the Gwent PSB, the Monmouthshire Well-being Plan was prepared by the Monmouthshire PSB and endorsed in February 2018. The RLDP Issues, Vision and Objectives are heavily drawn from and reflect the Monmouthshire PSB Well-being Plan which was extensively consulted upon by the Public Service Board in 2017 and resulted in contributions from more than
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	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, PPW12). In this respect, the Monmouthshire Well-being Plan was an integral part of the non-statutory stages ensuring it seeks to address key issues identified for Monmouthshire. In 2022, Monmouthshire County Council published Taking Monmouthshire Forward, a Community and Corporate Plan covering the period 2022-2028. It establishes the Council's purpose is for Monmouthshire to be "a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life". It sets out the objectives and values that will be adhered to and the actions needed to meet this purpose. These objectives and values are embodied in the RLDP strategy, with specific alignment between the RLDP and Corporate Plan's objectives highlighted in Table 1 of the Deposit Plan. The objectives each Strategic Policy support is also set out in the Links to Wider Policy Framework tables noted after each Strategic Policy. 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 RLDP is considered to reflect the aims of Y Bannau: The Future, the Management Plan for Bannau Brycheiniog National Park (2023 – 2028) and its five inter-connected missions relating to Climate, Water, Nature, People and Place with the complexities in balancing these goals represented in adapted version of the 'Doughnut' model of social and ecological boundaries. Many of the Plan's policies seek to deliver the same outcomes as Y Bannau: The Future. 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,
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	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 Deposit Plan and specific examples referenced throughout the Preferred Strategy in relation to the Strategic Policies. 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).
• Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) - Questions • Is it locally specific? • Does it address the key issues? • Is it supported by robust, proportionate and credible evidence? • Can the rationale behind plan policies be demonstrated? • Does it seek to meet assessed needs and contribute to the achievement of sustainable development? • Are the vision and the strategy positive and sufficiently aspirational? • Have the 'real' alternatives been properly considered? • Is it logical, reasonable and balanced? • Is it coherent and consistent? • Is it clear and focused?	Is it Locally Specific? In order to address the key issues and challenges facing Monmouthshire, the Deposit Plan builds upon the Adopted Local Plan objectives, taking account of a range of other policy drivers including the Well-Being of Future Generations Act 2015, the Gwent Public Service Board (PSB) Well-being Plan (this replaces the objectives previously set out in the Monmouthshire PSB Well-being Plan and the Council's Community and Corporate Plan. In this respect, the formulation of the Deposit Plan and the stages that came before, has been underpinned by this locally specific evidence base. Building on this and the extensive non-statutory consultation that has been undertaken to date (see Appendix 2 of the Deposit Plan for a summary) the Deposit Plan's overarching strategy has emerged as a direct result of a number of very locally specific issues, with a number of 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, responding to the climate and nature emergency to ensure proposals are environmentally sustainable and supporting and enabling sustainable economic growth. The Plan also responds to a number of challenges that have arisen following stakeholder consultation and engagement on the earlier non-statutory stages. Of note is the Welsh Government objection to the level of growth set out in that June 2021 Preferred Strategy and the issue of phosphate water quality issues in the River Wye and River Usk.

	The Plan's Growth Strategy as set out in Strategic Policies S1 and S2 propose a level and distribution of growth that has regard to these locally specific issues, whilst also ensuring that the RLDP delivers on our objectives and addresses our core issues of delivering affordable homes, responding the climate and nature emergency by delivering net zero carbon homes and ensuring our communities are socially and economically sustainable be attracting and retaining younger people to rebalance our ageing demographic. Does it address key issues? Each Strategic Policy highlights the links to the RLDP objectives, Gwent PSB Well-being Plan objectives and the Monmouthshire Community and Corporate Plan objectives. These locally specific, key issues are referenced extensively throughout the Deposit Plan and have formed the principal rationale for choosing the policy approach taken. Key issues addressed by the Plan include: • Delivering a level of growth (homes and jobs) that address our local issues, having regard to Welsh Government's comments regarding alignment with Future Wales: the National Plan 2040. • Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites. • Requiring new homes to be net zero carbon reflecting our commitment to responding to and tackling climate change. • Promoting sustainable economic growth. • Identifies Strategic Site Allocations within the primary settlements of Abergavenny, Caldicot (including Severnside), Chepstow and Monmouth, 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. • Lower level of growth in the most sustainable lower tier settlements to deliver affordable homes and address rural inequality and rural isolation in these areas.
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	Is it supported by robust, proportionate and credible evidence? Extensive evidence building has been undertaken to support the Deposit Plan which is available to view on the Council's website. 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 to date has informed the preparation of the Plan and its overarching strategy and 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. They are also supported by a series of detailed development management policies, which will help deliver on the aims of the strategic policies. All policies reference the relevant sections of PPW12, combined with any regionally or locally specific evidence forming a key approach to establishing the rationale to the Plan's policies. Policy areas are also supported by Background Papers, where relevant, to add further evidence to the rationale behind a policy approach. Does it seek to meet assessed needs and contribute to the achievement of sustainable development? The Deposit Plan 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 Integrated Sustainable Appraisal (2024) accompanying the RLDP, appraise the Deposit'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 Deposit Plan is indicative of the iterative feedback between the ISA and the RLDP as work progresses.
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	When assessed against the ISA themes the Deposit Plan is predicted to have a positive significant effect on themes including economy and employment, population and communities, health and wellbeing, equalities, diversity, and social inclusion and transport and movement in recognition of the Plan's proposing to deliver new employment and homes including tackling the affordable housing challenge, distributed to the higher tier settlements, where there is greater need and better access to sustainable transport modes and wider infrastructure. Minor positive effects are considered most likely in relation to the biodiversity and geodiversity ISA theme reflecting the policy framework in place to avoid adverse impacts on biodiversity and the policy requirement to bring forward biodiversity net gains and ecological connectivity. Significant negative effects are predicted in relation to the natural resources (air, land, minerals and water) ISA themes due to the substantial (and unavoidable) loss of greenfield and agricultural land. The ISA recognises that there are limited brownfield opportunities within Monmouthshire and that the Plan works well to allocate strategic site adjacent to built up areas. Minor negative effects are considered likely in relation to the landscape theme recognising that whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality. Effects remain uncertain in relation to the historic environment ISA theme due to the proximity of the strategic site allocations to heritage features, however it also recognises that there are notable policy provisions that will benefit the historic environment by protecting features and the setting they are located within. A neutral effect is considered most likely in relation to climate change adaptation and its relationship to flooding reflecting the allocation of sites at little or no risk of flooding. However, a minor negative effect is concluded in terms of climate change mitigation due to the level of growth proposed through the housing policies, although the ISA recognises the policies that seek to reduce emission.
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	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, supplemented by Monmouthshire's Economy, Employment and Skills Strategy (2023). 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 has been a key focus of the RLDP as it progressed to the Deposit stage. The Plan's contribution to the RLDP locally specific objectives is discussed above, which concludes that the Strategy/Plan performs well against addressing the needs of the County, with Plan's overarching strategy emerging as a direct result of a number of very locally specific issues, with a number of 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, responding to the climate and nature emergency to ensure proposals are environmentally sustainable and supporting and enabling sustainable economic growth. 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
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	positive one which seeks to create high quality, sustainable places in both urban and rural settlements within a Monmouthshire context. The Plan's 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. 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. 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 27th 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 2022 Preferred Strategy.
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	Following consultation on the 2022 Preferred Strategy, which took place between December 2022 and January 2023, a report was taken to Council in October 2023 to seek endorsement of a number of updates to the Preferred Strategy as the basis for the ongoing preparation of the Deposit Plan. As a result of the consultation, a small number of key changes to the Preferred Strategy were agreed and incorporated into the Deposit Plan: • The factual update to include 2022/23 data in the spatial distribution of housing table (this has since been updated to incorporate 2023/24 data). • Identification of a strategic site in Monmouth in response to Dwr Cymru Welsh Water investment and Welsh Government advice, together with changes to how the previously termed 'bonus sites' are factored into the housing figures. • Changing the strategic site in Chepstow. • Increasing the flexibility level from 10% to 15% and consequential adjustments to the spatial distribution of housing tables. • Enhancing the sustainability credentials and energy efficiency of new homes to be net zero carbon homes rather than net zero ready homes. The extensive consultation that has been undertaken on the non-statutory stages of the Plan process and the changes that have been made as a result of those consultation exercises, is considered to sufficiently demonstrate that 'real' alternatives have been considered throughout the plan process. In addition the ISA also includes an assessment of reasonable alternatives in relation to the level of growth, location of growth and strategic growth area options. Is it logical, reasonable and balanced? The Deposit Plan 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 Plan 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
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	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. Is it coherent and consistent? The Deposit Plan sets out a coherent strategy from which its strategic and detailed 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. Is it clear and focused? The Deposit Plan is set out in a clear and logical form, clearly showing the links between the various elements of the overarching Strategy. It provides a clear focus of its purpose, identifying the vision and issues associated with the Plan and how the Plan will seek to address these.
Test 3: Will the plan deliver (Is it likely to be effective?) Questions • Will it be effective? • Can it be implemented? • Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales? • Will development be viable? • Can the sites allocated be delivered?	Will it be effective? The RLDP'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. The RLDP makes provision for 6,210 homes, including a 15% flexibility allowance to meet a requirement of 5,400 homes over the Plan period, including the provision of up to 2,000 affordable homes. This level of growth will enable the provision of market and affordable housing and provides the opportunity to address the unbalanced demography, improve labour force retention and assists in the County's housing affordability challenge. In order to meet the housing provision figure of 6,210 homes, the RLDP makes 18 new housing/mixed use allocations for 2,305 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.

• Is the plan sufficiently flexible? Are there appropriate contingency provisions? • Is it monitored effectively?	These new allocations provide the Council with the opportunity to open up longer term directions for strategic growth and implement place-making and climate change principles. The Plan also allocates 57ha of B Use Class employment land to meet the minimum requirement of 38ha and provides 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 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. Responding to the climate and nature emergency, the RLDP establishes the requirement for new homes to be net zero carbon, reflecting the Council's commitment to responding to and tackling climate change. New housing allocations have also been made on a 50% affordable homes basis, delivering on the key objective of providing more affordable homes in the County. Can it be implemented? The preparation of the Deposit Plan is with the clear intention that it will be implementable and that its policies and proposals will be delivered within the Plan period. The Deposit Plan sets out a deliverable spatial framework and growth levels which are based on sustainability principles and responsive to the needs of the communities of Monmouthshire. The policies and proposals (both strategic and detailed) 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 forms part of the extensive evidence base supporting the Deposit Plan. The level of affordable housing noted above aligns with the Council commitment of ensuring that new site allocations provide 50% affordable housing. In order for residential sites to be allocated in the RLDP, it has been a pre-requisite that site promoters demonstrate that sites are viable and deliverable, having regard to the Council's commitment for 50% affordable housing provision on new
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	sites. To ensure the site delivers on the key priorities of the RLDP, site specific policies have been prepared for every housing allocation and an Infrastructure Delivery Plan (Appendix 8 of the RLDP) has also been prepared which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of the allocated sites. Housing and employment trajectories are also included in the Deposit Plan setting out anticipated timescales for the delivery of site allocations. 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 57ha of employment land to meet a minimum requirement of 38ha of employment land to facilitate the delivery of industrial and business employment uses. The RLDP will also include a policy framework to support job growth from other key employment sectors including retail, leisure and tourism. Details of the net zero carbon homes policy are set out in Policy NZ1 – Monmouthshire Net Zero Carbon Homes. The Deposit RLDP sets out an effective and appropriate monitoring framework, which 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. 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. 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. The RLDP is supported by an Infrastructure Delivery Plan (Appendix 8 of the RLDP) and site-specific viability
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	assessments which have factored in appropriate costs and timescales for supporting infrastructure to be provided. Will the development be viable? The Plan is supported by a high-level affordable housing viability evidence and detailed 'site specific' viability assessments that have used the Development Viability Model, which was developed by Burrows-Hutchinson Ltd on behalf of SEWSPG, establishing a robust and consistent methodology for assessing viability across authorities in the south east Wales region. This demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing thresholds are set out in Strategic Policy S7 and reflect the outcomes of the viability evidence. The input of a Viability Steering Group has also informed the viability process to ensure key inputs reflect market conditions in Monmouthshire. This site-specific information together with viability modelling has been used to evidence that the sites allocated in the Deposit Plan are viable. Each proposed housing allocation is supported by robust technical and viability evidence. The individual site-specific viability assessments that accompany each allocation reflect the circumstances specific to that development whilst also applying a standard approach/cost to variables agreed as part of the Viability Steering Group, where relevant. The site-specific assessments have been periodically updated throughout the plan preparation to ensure they capture the latest costs, values and planning obligation requirements as well key policy requirements such as 50% affordable homes and net zero carbon homes. The latest round of site-specific viability assessments reaffirmed that the proposed allocations are viable and can accommodate the Plan's policy requirements. Can the sites allocated be delivered?
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	In addition to the viability evidence noted above, the Plan is also accompanied by a housing trajectory, which demonstrates the phasing and delivery of housing over the lifetime of the plan. This has been produced in consultation with site promoters and wider stakeholders to ensure realistic phasing and delivery rates have been considered. The Infrastructure Delivery Plan (Appendix 8 of the RLDP) also demonstrates how infrastructure provision has been considered in tandem to support the housing trajectory. Is the Plan sufficiently flexible? Are there appropriate contingencies in place? The RLDP 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 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. In December 2022, the Preferred Strategy (2022) was published for public consultation between the period 5th December 2022 and 30th January 2023. The Preferred Strategy included a housing requirement figure of 5,400 homes and included a flexibility allowance of 10%, caveated that this was subject to review as part of the Deposit Plan preparation. In October 2023, a report was taken to Full Council to seek Council's endorsement of a number of post-consultation updates to the Preferred Strategy. An increase in the flexibility rate from 10% to 15% was one of the updates agreed. The increase in flexibility from 10% to 15% increases the housing provision from 5,940 to 6,210 homes and resulted in an additional 270 units being added to the total figure to be provided for in the RLDP. The Council report justifies the increase in the flexibility allowance on the following basis: • It ensures the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst allowing the allocation of smaller sites across the County to sustain and enhance existing communities. • Ensures that the Plan is more robust and resilient as there is delivery in the short-term while the large strategic sites take time to be developed out.
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- Will result in the Plan being able to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop.
- A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing current unmet affordable housing need.

As evidenced through the housing trajectory, this level of flexibility comfortably demonstrates delivery of the Anticipated Annual Build Rate (AABR) throughout the Plan period. The flexibility allowance has been reviewed and increased to ensure the Plan will remain effective in the event of changing circumstances.

Similarly, in order to support the Plan's economic growth aspirations, 57ha of B Use Class has been allocated to meet the minimum requirement of 38ha. This allows for a range of employment sites to be allocated to meet a range of employment needs throughout the County. The Plan also provides a supportive policy framework to provide a flexible approach to economic opportunities that might come forward throughout the Plan period.

Is it monitored effectively?

An effective and appropriate monitoring framework has been developed and included within the Plan and will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR represents 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.

3. General Conformity with Future Wales: The National Plan 2040 Assessment

- 3.1. 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.
- 3.2. 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 12 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 policies 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.
- 3.3. The purpose of this Appendix is to demonstrate that the Monmouthshire Deposit Replacement Local Development Plan assists in the delivery of the Future Wales policies and is in general conformity with its overarching strategy.
- 3.4. The following section assesses whether the RLDP objectives and Strategic Policies set out in the RLDP are considered to be in general conformity with Future Wales Policies using the traffic light model below:

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

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

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

Future Wales Policy	Relevant RLDP Objectives and RLDP Strategic Policies	General Conformity with FW Strategy
Policy 1 – Where Wales will grow The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are: • Cardiff, Newport and the Valleys • Swansea Bay and Llanelli • Wrexham and Deeside The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions: • The South West • Mid Wales • The North	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	Monmouthshire is not identified as a growth area in Future Wales, however, the policy allows for growth in towns and villages in rural areas of an appropriate scale and to support local aspiration and need. The RLDP growth level has emerged from an understanding of the issues, challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The Council has considered how best to progress the RLDP having regard to a number of challenges that have arisen following stakeholder consultation and engagement on the non-statutory stages. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a ‘green’ rating and noting that <i>“Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not</i>

Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.	S7 – Affordable Homes S8 – Site Allocations and Placemaking Principles S10 – Employment Sites Provision S13 – Sustainable Transport	<i>undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</i> In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government. 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 RLDP, is it considered the level and distribution of growth proposed is of an appropriate scale to specifically address local aspirations and needs.
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Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking 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. Urban growth and regeneration should be based on the following strategic placemaking principles: • creating a rich mix of uses; • providing a variety of housing types and tenures; • building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other; • increasing population density, with development built at urban densities that can support public transport and local facilities; • establishing a permeable network of streets, with a hierarchy that informs the nature of development; • promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and • integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.	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: S3 – Sustainable Placemaking and High-Quality Design S5 – Green infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Strategic Policy Framework supported by detailed policies, 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 Deposit Plan 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. The Deposit Plan focuses growth on the four primary settlements of Abergavenny, Caldicot (including Severnside), Monmouth and, to a lesser extent, Chepstow. The Strategy identifies four 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 Abergavenny and Caldicot sites will deliver a mix of uses and amenities on site. Input from the Design Commission for Wales has also helped shape the progression of the Strategic sites and identify key placemaking parameters. In addition, a range of other housing sites are allocated throughout the County in our most
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Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.	S15 – Community and Recreation Facilities	sustainable settlements as identified by the Sustainable Settlement Appraisal. All residential allocations must comply with Policy S8 – Site Allocation Placemaking Principles and site-specific requirements which are set out in individual site allocation policies. Overall, the RLDP is considered to be in conformity with the principles set out in Policy 2 of Future Wales.
Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership The Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will assemble land, invest in infrastructure and prepare sites for development. We will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. The public sector must show leadership and apply placemaking principles to support growth and regeneration for the benefit of communities across Wales. The public sector’s use of land, developments, investments and actions must build sustainable places that improve health and well-being.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 10 – Housing Objective 11 – Placemaking Objective 14 – Infrastructure RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design	The Deposit Plan policy framework establishes the direction for the RLDP to ensure sustainable growth in the County, embodying the principles set out in the Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. Monmouthshire County Council recognise the significant role it must play in providing public leadership in achieving this aim. To deliver on these key objectives sites allocated in the RLDP have been required to demonstrate that they are viable and deliverable, having regard to the Council’s commitment for 50% affordable housing provision on new site allocations, the requirement for net zero carbon homes and associated infrastructure to ensure the development is sustainable and well-connected. This commitment could have financial implications for the Council of reduced land sale receipts. It may also

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.	S5 – Green Infrastructure, Landscape and Nature Recovery S6 – Infrastructure Provision S7– Affordable Homes S8 – Site Allocation Placemaking Principles S12 – Employment Sites Provision	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 Strategic Site Allocations is promoted by a Registered Social Landlord, and another extends onto Council-owned land offering opportunities to deliver affordable housing in 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:	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 RLDP 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 Deposit Plan 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.

	S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S7 – Affordable Homes S11 – Rural Enterprise S12 – Visitor Economy S13 – Sustainable Transport	
Policy 5 – Supporting the rural economy The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and Local Development Plans must plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their	Objective 1 – Economic Growth / Employment Objective 9 – Demography Objective 11 – Placemaking Objective 12 – Communities Objective 13 – Rural Communities Objective 16 – Culture, Heritage and Welsh Language RLDP Strategic Policies: S1 – Growth Strategy	A significant issue for Monmouthshire is the need to sustain and regenerate the County's rural economy consistent with the policy aims of Policy 5 of Future Wales. The Deposit Plan provides the policy framework to allow for an appropriate amount of diversification and enterprise in rural areas as well as the infrastructure both physical and digital to facilitate this. The Plan also recognises the role the agricultural and forestry, tourism and leisure sectors play in Monmouthshire's economy and seeks to facilitate their growth at an appropriate scale. The Plan is supplemented by a range of employment/economy-based evidence including the Economy, Employment and Skill Strategy.

full potential, broadening the economic base, and creating higher paid jobs.	S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S6 – Infrastructure S10 – Employment Sites Provision S11 – Rural Enterprise S12 – Visitor Economy	
Policy 6 – Town Centre First Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region. A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 2 – Town and Local Centres Objective 11 – Placemaking Objective 12 – Communities Objective 13 Rural Communities Objective 15 – Accessibility RLDP Strategic Policies: S1 – Growth Strategy	In accordance with PPW12 the Deposit Plan sets out the town centre hierarchy for Monmouthshire with a view to sustaining and enhancing the County's main towns as vibrant and attractive centres and to maintain their essential functions as attractive places to live and visit and provide a valuable role in meeting the needs of local communities. The hierarchy assists the implementation of the sequential approach and town centre first principle by directing retail, commercial and social developments, including leisure, cultural and entertainment uses to the appropriate position in the hierarchy. The Monmouthshire Town Centre / Retail Study (2024) which includes an update of retail expenditure forecasts confirms that there will be more limited expenditure growth available to support shop

	S2 – Spatial Distribution of Development – Settlement Hierarchy S3 – Sustainable Placemaking & High-Quality Design S14 – Town, Local and Neighbourhood Centres	floorspace within Monmouthshire centre than previously forecast. In this respect, the RLDP therefore does not make any new retail allocations.
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 S7 – Affordable Homes	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 Plan's overarching Strategy. Accordingly, the Deposit Plan establishes a policy framework that seeks to address this through an affordable housing target of up to 2,000 affordable homes, establishing affordable housing percentage thresholds within Strategic Policy S7 and requiring 50% affordable housing on new site allocations. Additional opportunities to increase the supply of affordable housing through a housing mix policy and an affordable housing exceptions sites policy have also been incorporated in the 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 RLDP sets out the Council's commitment for 50% affordable housing provision on new site allocations. This

	S8 – Site Allocation Placemaking Principles	commitment could have financial implications for the Council of reduced land sale receipts. It may also require Welsh Government policy position changes on use of Social Housing Grant or 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. The latest Local Housing Market Assessment (LHMA) (May 2024) provides the evidence base on affordable housing matters within the RLDP.
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	The Deposit Plan 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 Plan 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 Drainage Systems and flood resilience design. In accordance with the updated TAN15, a

	S5 – Green Infrastructure, Landscape and Nature Conservation	Strategic Flood Consequence Assessment (SFCA) along with other Planning Authorities in the South-East Wales region, has been undertaken to inform the preparation of the RLDP and the site allocation process. The RLDP also recognises the significant role Green Infrastructure plays in flood attenuation and water resource management and managing and enhancing biodiversity and ecosystems resilience.
Policy 9 – Resilient Ecological Networks and Green Infrastructure 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.	RLDP Objectives: 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	Monmouthshire has significant green infrastructure, landscape, biodiversity and nature conservation resources. The need to protect and enhance these 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 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 environment.	S5 – Green Infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles	planning management and delivery of green infrastructure in Monmouthshire. Section 5 of the RLDP also sets out the policy requirements relating to ecological resilience and green infrastructure with site specific requirements set out in policy S8 – Site Allocation Placemaking Principles and site-specific requirements set out in policies HA1 – HA18.
Policy 10 – International Connectivity The Welsh Government identifies the following Strategic Gateways to facilitate international connectivity: • Cardiff Airport • Holyhead Port • Haven Waterway, including the Ports of Milford Haven and Pembroke Dock • Fishguard Port The Welsh Government will work with the operators, investors and local authorities to support Strategic Gateways and maintain their international connectivity roles. Strategic and Local Development Plans should support the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales.		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.

New development around the Strategic Gateways should be carefully managed to ensure their operation is not constrained or compromised.		
Policy 11 – National Connectivity The Welsh Government will support and invest in improving national connectivity. Our priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. The Welsh 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 quality of rail services for passengers. • Bus Network – Invest in the development of the national bus network, fully integrated with regional and local bus networks, to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Strategic Road Network – Invest in road improvements to reduce journey times, deliver a safer and more resilient road network, and improve air and noise quality. Create a network of rapid-charging points to enable longer distance travel by electric vehicles throughout Wales. • National Cycle Network – Revitalise the National Cycle Network to create a network of traffic-free	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S6 – Infrastructure Provision S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Deposit Plan seeks to promote sustainable forms of 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 and is a requirement of Policy S4 – Climate Change. The RLDP promotes the sustainable transport hierarchy and requires new developments to incorporate new links to facilitate movement by non-car methods. However, Monmouthshire is predominantly a rural County and as set out in FW Policy 5, it is recognised that there are significant

paths connecting cities, towns and countryside across Wales. Planning authorities should support developments associated with improvements to national connectivity and, where appropriate, maximise the opportunities that arise from them. Planning authorities must ensure that, where appropriate, new development contributes towards the improvement and development of the National Cycle Network and key links to and from it.		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 demonstrate innovative solutions to connect rural locations to services and facilities. The RLDP will also seek to facilitate the Monmouthshire specific recommendations of the South East Wales Transport Commission Final Recommendations Plan 2020, which 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 has therefore planned 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 Strategic Site Allocations of Land to the East of Abergavenny, Mounton Road in Chepstow, Leasbrook in Monmouth and Land to the East of Caldicot will be linked to the town centre and railway stations (where relevant) via active travel connections. Site specific allocation policies have set out key placemaking and active travel requirements.
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		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 has been prepared alongside the preparation of the Deposit Plan. The RLDP supports the transport schemes identified within the updated LTP, and where appropriate, safeguards land for key transport proposals.
Policy 12 – Regional Connectivity The Welsh Government will support and invest in improving regional connectivity. In urban areas, to support sustainable growth and regeneration, our priorities are improving and integrating active travel and public transport. In rural areas our priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity: • Active Travel – Prioritising walking and cycling for all local travel. We will support the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday purposes.	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate and Nature Emergency S6 – Infrastructure Provision S8 – Site Allocation Placemaking Principles S13 – Sustainable Transport	The Deposit Plan seeks to promote sustainable forms of transport, reduce the need to travel, increase provision for walking and cycling and improve public transport provision. The spatial strategy of the RLDP aims 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 and is a requirement of Policy S4 – Climate Change.

• Bus – Improve the legislative framework for how local bus services are planned and delivered. We will invest in the development of integrated regional and local bus networks to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Metros – Develop the South East Metro, South West Metro and North Wales Metro. We will create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail. • Ultra-Low Emission Vehicles – Support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas. Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations. Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.		As noted above the RLDP will also seek to facilitate the Monmouthshire specific recommendations of the 'South East Wales Transport Commission Final Recommendations Plan 2020, which recommends the enhancement of the Severn Tunnel Junction rail station and access arrangements, and development of a walkway station at Magor and Undy. It will also 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 Strategic Site Allocations of Land to the East of Abergavenny, Moun-ton Road in Chepstow, Leasbrook in Monmouth and Land to the East of Caldicot will be linked to the town centre and railway stations (where relevant) via active travel connections. Site specific allocation policies have set out key placemaking and active travel requirements. 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 has been prepared alongside the Deposit Plan. The RLDP supports the transport schemes in identified within the updated LTP, and where
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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.		appropriate, safeguards land for key transport proposals.
Policy 13 – Supporting Digital Communications The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out 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.	RLDP Objectives: Objective 14- Infrastructure RLDP Strategic Policies: S6 – Infrastructure Provision	Given Monmouthshire’s rural character, the RLDP recognises the importance of ensuring the provision of adequate digital infrastructure to enhancing the County’s economic and community connectivity and communication needs and reducing the need to travel.
Policy 14 – Planning in Mobile Action Zones The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings. The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage.	RLDP Objectives: Objective 14- Infrastructure RLDP Strategic Policies: S6 – Infrastructure Provision	Future Wales does not identify the Mobile Action Zones at this stage. The RLDP is therefore considered to have a neutral impact on achieving the policy aims. This will be reviewed once the Mobile Action Zones are published.

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 The Welsh Government is committed to developing a national forest through the identification of appropriate sites and mechanisms. Action to safeguard proposed locations for the national forest will be supported.	RLDP Objectives: 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 S5 – Green Infrastructure, Landscape and Nature Conservation	Future Wales does not identify the location(s) of the proposed national forest. However, Welsh Government identify 14 National Forest Sites that are part of its estate and managed and maintained by Natural Resources Wales, two of which are within Monmouthshire's boundary – Wentwood Forest and Wye Valley Woodlands. Work is ongoing by Welsh Government to identify additional sites. Policy S5 of the Deposit 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	RLDP Objectives: Objective 17 – Climate and Nature Emergency	There are no Priority Areas for District Heat Networks identified within the Monmouthshire boundary within Future Wales. The RLDP does, however, establish the

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 Strategic Policies: S4 – Climate Change S8 – Site Allocation Placemaking Principles	policy framework requiring residential developments to be built to net zero carbon standards, including the requirement to not connect to the gas grid and heating to be provided through low carbon heating systems. Similarly, the RLDP supports the development of renewable and low/zero carbon energy generation in principle and has allocated a potential ground mounted solar development. A Renewable and Low Carbon Energy Assessment (RLCEA) of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan in terms of its policy approach in relation to local search areas for the potential for types of renewable and low/zero carbon energy and renewable energy targets. 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/m² 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 developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.	RLDP Objectives: Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change	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, establish the policy framework for developing renewable and low carbon energy from all technologies through Strategic Policy S4 – Climate Change and associated detailed policies. An assessment of the potential for renewable energy

In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, 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.		generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan's approach to the identification of local search areas for different types of renewable and low/zero carbon energy. Consistent with FW, the Renewable and Low Carbon Energy Assessment (RLCEA) concludes that there is limited wind resource in Monmouthshire. It does, however, identify significant solar resource. However, this resource is reduced significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar, it does, however, include a criteria-based policy to determine proposals on a site-by-site basis. The findings of the RLCEA have also been used to inform the RLDP renewable energy generation targets. The Plan also allocates a potential ground mounted solar development.
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Policy 18 – Renewable and Low Carbon Energy Developments of National Significance Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria: 1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty); 2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings; 3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and 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;		Policy 18 of Future Wales sets out the criteria Welsh Government will use to assess renewable and low carbon energy developments of national significance. The RLDP is therefore considered to have a neutral impact on its delivery as it is not Monmouthshire's policy framework being used to determine the proposals. As noted above, an assessment of the potential for renewable energy generation, using the Welsh Government Toolkit, has been undertaken and informed the Deposit Plan's approach to the identification of local search areas for different types of renewable and low/zero carbon energy. Consistent with FW, the Renewable and Low Carbon Energy Assessment (RLCEA) concludes that there is limited wind resource in Monmouthshire. It does, however, identify significant solar resource. However, this resource is reduced significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar, it does, however, include a criteria-based policy to determine proposals on a site-by-site basis. The findings of the RLCEA have also been used to inform the RLDP renewable energy
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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.		generation targets. The Plan also allocates a potential ground mounted solar development.
Policy 19 – Strategic Policies for Regional Planning Strategic Development Plans should embed placemaking as an overarching principle and should establish for the	RLDP Objectives: Objective 1 – Economic Growth / Employment Objective 5 – Minerals and Waste	A Strategic Development Plan for the South East Wales region is yet to commence. However, the preparation of the RLDP has involved a regional and coordinated approach to the collection of evidence including a Regional Assessment of Future Growth and Migration

region (and where required constituent Local Development Plans): 1. a spatial strategy; 2. a settlement hierarchy; 3. the housing provision and requirement; 4. the gypsy and traveller need; 5. the employment provision; 6. the spatial areas for strategic housing, employment growth and renewable energy; 7. the identification of green belts, green corridors and nationally important landscapes where required; 8. the location of key services, transport and connectivity infrastructure; 9. a framework for the sustainable management of natural resources and cultural assets; 10. ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and 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.	Objective 7 – Natural Resources Objective 10 – Housing Objective 14 – Infrastructure RLDP Strategic Policies: S1 – Growth Strategy S2 – Spatial Distribution of Development – Settlement Hierarchy S6 – Infrastructure Provision S7 – Affordable Housing S8 – Site Allocation Placemaking Principles S9 – Gypsy and Travellers S10 – Employment Sites Provision S13 – Sustainable Transport S16- Minerals S17 – Sustainable Waste Management	for the Cardiff Capital Region (CCR), commissioned on behalf of local authorities in the South East Wales region. Further evidence has been approached with a regionally agreed methodology including population projection modelling, regional employment study, Renewable and Low Carbon Energy Assessment 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. Similarly, a number of jointly commissioned pieces of evidence have also informed the RLDP including a Development Viability Model and a Strategic Flood Consequence Assessment. Long standing regional working methods associated with areas such as waste and minerals are continued and reflected in the Plan. 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 Wales SDP.
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Policy 33 – National Growth Area – Cardiff, Newport and the Valleys Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys’ strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. The Welsh Government supports Cardiff’s status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport.	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 S7 – Affordable Homes S8 – Site Allocation Placemaking Principles S10 – Employment Sites Provision S13 – Sustainable Transport	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 RLDP growth level has emerged from an understanding of the issues, challenges and needs of Monmouthshire as well as a sound, logical and robust evidence base. The Council has considered how best to progress the RLDP having regard to a number of challenges that have arisen following stakeholder consultation and engagement on the non-statutory stages. In response to the Preferred Strategy (Dec 2022), consultation Welsh Government formally responded with a ‘green’ rating and noting that <i>“Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Preferred Strategy is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</i> In this respect the overarching strategy of the Deposit Plan has been accepted as being in conformity with Future Wales by Welsh Government.
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The Welsh Government supports co-ordinated regeneration and 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.		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 background evidence to the RLDP shows that the proposed level of growth is essential to deliver our local evidence-based issues and objectives and ensure the RLDP is 'sound' in respect of all tests of soundness. The RLDP growth strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for the wider South Wales region. The RLDP seeks to build on Monmouthshire's key strategic location that benefits from good links to Cardiff, Bristol and the Midlands. The RLDP recognises that given Monmouthshire position as the gateway to Wales combined with the wider opportunities associate with the Cardiff Capital Region City Deal, South East Wales Metro and the County's strategic location between the Great Western Cities of Cardiff,
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		Newport and Bristol, the County has potential to contribute to the aims for the wider region.
Policy 34 – Green Belts in the South East The Welsh Government requires the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in the West of England. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.	RLDP Objectives: Objective 3 – Green Infrastructure, Biodiversity and Landscape Objective 6 – Land RLDP Strategic Policies: S2 – Spatial Distribution of Development – Settlement Hierarchy S5 – Green Infrastructure, Landscape and Nature Conservation S8 – Site Allocation Placemaking Principles	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 been given to PPW12 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”. In this respect, the RLDP 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. 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 35 – Valleys Regional Park The Welsh Government supports the establishment of the Valleys Regional Park. 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 35 – Valleys Regional Park is not considered to be directly related to Monmouthshire. The RLDP is therefore considered to have a neutral impact of achieving its aims.
Policy 36 – South East Metro The Welsh Government supports the development of the South East Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Strategic and Local Development Plans must support the South East Metro. Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.	RLDP Objectives: Objective 14 – Infrastructure Objective 15 – Accessibility Objective 17 – Climate and Nature Emergency RLDP Strategic Policies: S4 – Climate Change S6 – Infrastructure Provision S13 – Sustainable Transport	Preferred Strategy Policy S13 – Sustainable Transport, sets out the policy framework to promote sustainable travel in the County with specific reference to developing the role of Monmouthshire’s Primary settlements in accordance with the South East Wales Regional Plan and Monmouthshire’s Local Transport Plan around which low carbon sustainable transport opportunities can be developed and linked to the South East Wales Metro. The RLDP identifies site allocations within 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.

		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 has been prepared alongside the RLDP. The Plan supports the transport schemes identified within the updated LTP, and where appropriate, safeguards land for key transport proposals.
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Conclusion

- 3.5. As the assessment above demonstrates, the RLDP 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.
- 3.6. 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 RLDP 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.