



Monmouthshire Replacement Local Development Plan

2018-2033

Deposit RLDP Consultation Report

October 2025



monmouthshire
sir fynwy

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Consultation Report: Deposit RLDP

1. Background and Introduction

- 1.1. The Planning and Compulsory Purchase Act 2004 (section 62) requires all local authorities to prepare a local development plan (LDP) for their area. The Town and Country Planning (LDP) (Wales) Regulations 2005 (as amended) prescribes the form and content of LDPs and process to be followed for their preparation.
- 1.2. Monmouthshire County Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within Bannau Brycheiniog National Park), covering the period 2018 to 2033. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies against which future planning applications will be assessed. When adopted, the RLDP will replace the existing adopted LDP as the statutory land use development plan for the County.
- 1.3. The preparation of the RLDP involves a number of key stages as shown in Figure 1 and has proceeded to submission stage. The Plan is being prepared in accordance with the revised Delivery Agreement (October 2024) which sets out the timetable for Plan preparation and the approach to community consultation and engagement.

Figure 1: Key Stages of the RLDP Process



- 1.4. The RLDP has evolved through a number of key plan stages since commencement in 2018. Several challenges have arisen during the plan preparation period which have affected progress and required further consideration at the relevant stage. These challenges include the publication of updated Welsh Government based population projections, the Covid 19 pandemic, an objection from Welsh Government to the June 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk catchment areas. These challenges have resulted in a number of stages being revisited, with several iterations of documents being published for consultation. This report sets out details of each stage by LDP Regulation and discusses the background to the documents prepared and revisited relevant to that stage. An overview, however, of each key stage up to the Deposit stage in chronological order is set out in Appendix 1. This provides an audit trail of the sequence of events related to the progression of the RLDP.
- 1.5. The Deposit RLDP was subject to public consultation from 4th November to 16th December 2024, in accordance with the revised Delivery Agreement and LDP Regulation 17. This Report sets out who and how we engaged with the community and stakeholders at each stage of the RLDP plan process, up to Deposit. Details of

the 2022 Preferred Strategy stage are, however, expanded upon in the Initial Consultation Report, which was prepared in accordance with LDP Regulation 16A. This Consultation Report has been prepared in accordance with LDP Regulation 22(2) and guidance set out in the Development Plans Manual.

- 1.6. In accordance with LDP Regulation 22(2) this report:
- Identifies the bodies engaged and consulted and number of representations received at pre-deposit and deposit stage.
 - Sets out the steps taken to publicise /engage throughout the RLDP preparation process.
 - Summarises the main issues raised at pre-deposit and deposit stage and how the main issues have been addressed in the RLDP.
 - Recommends how the Council considers each representation at Deposit stage should be addressed.
- 1.7. This Consultation Report clearly sets out the Council's consideration of all duly made representations received on the Deposit RLDP.

Structure of this Document

- 1.8. The report provides an overview of the consultation methods, including who and how we engaged/consulted, at key stages of the RLDP process, including:
- Delivery Agreement (LDP Regulation 9)
 - Call for Candidate Sites (LDP Regulation 14)
 - Pre-Deposit Participation (LDP Regulation 14)
 - Preferred Strategy Consultation (LDP Regulation 15)
 - Candidate Site Register Consultation (LDP Regulation 15)
 - Deposit Consultation (LDP Regulation 17)
- 1.9. Section 8 of the report provides a summary of the main issues raised to the Deposit Plan consultation. Full details of each duly made representation and the Council's response are provided in a series of separate documents reflecting the volume of representations received in relation to the Deposit Plan.
- 1.10. A separate Representations Register has also been published, which provides a copy of the duly made representations that were received by the Council during the RLDP Deposit consultation. Again, this is set out in a series of volumes due to the number of representors that commented on the Deposit Plan. The Register has been published in accordance with Regulation 19 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and can be viewed on the Council's website. The register is a factual compilation of the comments received, with the necessary redactions made where relevant.

Integrated Sustainability Assessment

- 1.11. All formal stages of the RLDP are subject to an Integrated Sustainability Assessment (ISA) which fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-Being of Future Generations (WBFG). The role of the Sustainability Appraisal is to assess the extent to which the emerging policies will help achieve the wider environmental, economic, social and cultural objectives of the Replacement Local Development Plan (RLDP).

- 1.12. The first stage in the ISA process is the preparation of Sustainability Scoping Report which sets out the sustainability appraisal issues and objectives/criteria against which the RLDP strategy, policies and proposals will be assessed, and includes a review of the plans, programmes, strategies and policies relevant to the RLDP and a review of the environmental, social and economic baseline characteristics of the County, which are updated throughout the Plan preparation process. The Scoping Report was issued for targeted consultation for a five-week period from 26th October 2018 – 30th November 2018. The post consultation report was agreed on 16th January 2019 by Individual Cabinet Member.
- 1.13. The ISA procedure is an iterative process, with assessments undertaken at the relevant Preferred Strategy stages and Deposit Stage. The ISA reports have been published for formal consultation alongside the Preferred Strategies and Deposit Plan, with consultation and engagement details set out throughout this report.

Habitats Regulations Assessment

- 1.14. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the RLDP. The HRA must determine the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance and if applicable, scope what needs ‘appropriate assessment’.
- 1.15. Again, the HRA is prepared alongside the RLDP and as an integrated and iterative process. The Initial Screening Report is the first stage of the process and involves identifying and agreeing a list of European sites to take forward in consideration of the potential for likely significant effects to arise as a result of the RLDP. The draft HRA Initial Screening Report was issued for targeted consultation for a five-week period from 26th October 2018 to 30th November 2018 and subsequently agreed on 16th January 2019 by Individual Cabinet Member. Reflecting the requirements of the Habitats Regulations, iterative HRA Reports accompanied the Preferred Strategies and Deposit Plan and were subject to the same consultation arrangements.

2. Delivery Agreement (LDP Regulation 9)

- 2.1. The first requirement of the Replacement Local Development Plan process is the preparation of a Delivery Agreement (DA). It provides the timetable for the preparation of the Plan and includes a Community Involvement Scheme (CIS), which details how and when the Council will consult and engage with groups, organisations and individuals during the Plan's preparatory process.
- 2.2. A report was presented to Council on 19th March 2018 seeking approval to undertake targeted consultation on the initial draft DA for a four-week period from 21st March to 18th April 2018. The draft document was sent to 74 statutory consultees, including the Welsh Government, Natural Resources Wales, all Town and Community Councils in Monmouthshire, and neighbouring Local Authorities. Responses were received from six external parties, resulting in nine individual representations which were individually summarised, together with the Council's draft response in a Report of Consultation, and reported to Council on 10th May 2018. The DA was subsequently agreed with Welsh Government on 14th May 2018, with the final Delivery Agreement published in the May 2018.
- 2.3. In accordance with Welsh Government advice there is no requirement to consult on subsequent revisions to the initial DA, with details of set out below:

Delivery Agreement Revisions	Details
Initial Delivery Agreement – May 2018	Establishes timetable for key stages of the plan preparation and approach to community engagement. Agreed by Welsh Government on 14 th May 2018.
First Revision – March 2020	Amended to reflect the delays incurred up to the Preferred Strategy stage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work. The Revised Delivery Agreement was approved by Council on 5 th March 2020 and agreed by Welsh Government on 6 th March 2020.
Second Revision – October 2020	Updated to reflect unavoidable delays relating to the Covid-19 pandemic, the review of the Issues, Vision, Objectives and Evidence Base, and publication of 2018-based population projections. The Revised DA was reported to Council on 22 nd October 2020. The CIS was also reviewed and adjusted in line with the Coronavirus Regulations (2020) and Ministerial advice to reflect social

	distancing and other measures. The revised DA was agreed with the Welsh Government on the 30 th October 2020.
Third Revision – December 2022	Updated to reflect revised timescales following the decision to embark on a new Preferred Strategy following an objection from Welsh Government to the July 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk Catchment areas. The Revised DA was agreed by Council on 1st December 2022 and agreed with Welsh Government on the 2nd December 2022.
Fourth Revision – October 2024	Updated to reflect impacts on the publication of the Deposit RLDP due to the timing of a UK General Election. The Revised DA was agreed by Council on 24th October 2024 and agreed with the Welsh Government on 25th October 2024.

3. Call for Candidate Sites (Regulation 14)

- 3.1. As part of the plan preparation process, the Council invited landowners, developers and the public to put forward candidate sites to be considered for development, redevelopment or protection in the RLDP. This was undertaken as part of a two-staged process details of which are set out in the Candidate Site Methodology.
- 3.2. Stage one involved an Initial Call for Candidate Sites, which took place for a sixteen-week period from 30th July to 19th November 2018. Letters and emails were sent to all those on the Planning Policy database, including statutory bodies, organisations, agents and private individuals, and forms were made available in the Council's Community Hubs, One Stop Shop and public libraries. The Council also offered a Candidate Site Advice service, with 34 Candidate Site Advice meetings held with site promoters.
- 3.3. In response to the initial call, 220 Candidate Sites were submitted by landowners, agents and developers for a range of uses, including residential, employment and recreation uses, as well as for protection. All sites were compiled into a Candidate Site Register which was available to view on the Council's website and in County Hall, Usk.
- 3.4. A Second Call for Candidate Sites commenced on 9th March 2020 due to run for a twelve-week period to 3rd June 2020. Letters and emails were sent to approximately 1,000 representors on the Planning Policy database, including those who submitted a site during the Initial Call. Forms and guidance notes were made available in the Council's Community Hubs, One Stop Shop and public libraries and on the Council's website. However, due to the Covid-19 pandemic and advice from the Minister of Housing and Local Government, the decision was made to cease the Second Call for Candidate Sites on 20th July 2020. A notice of cessation was sent to the statutory consultees and other consultees on the Council's consultation database and placed on the Council's website advising of this decision.
- 3.5. A Second Call for Candidate Sites then took place alongside the 2021 Preferred Strategy consultation for an eight-week period from 5th July to 31st July 2021. Letters/emails were sent to approximately 1,000 consultees on the Planning Policy database, including all of those who submitted a site during the Initial Call. Forms and various guidance notes to support the submission of sites were made available in the Council's Community Hubs, One Stop Shop and public libraries and on the Council's website. The Second Call for Candidate Sites generated 159 candidate site submissions for development/redevelopment for a range of uses, including residential, employment and recreation uses. A total of 20 candidate sites for protection were submitted during both the calls for sites. Candidate sites submitted for protection during the Initial Call were logged in the register to be given further consideration as part of the Deposit Plan.
- 3.6. All sites submitted during the Second Call for Candidate Sites were published in a Candidate Sites Register, which updated and replaced the register published following the Initial Call for Candidate Sites. Sites that were not resubmitted following the Initial Call for Candidate Sites were not included in the updated Register. Emails and letters were sent to stakeholders on the RLDP consultation database on the 10th February 2022, notifying of the publication of the Candidate Site Register on the Council's website, noting that it was for informative purposes only at that time.

- 3.7. An update to the Candidate Sites Register was made following the 2022 Preferred Strategy consultation stage and was available to comment on at the Deposit consultation stage. The update included previously filtered out sites due to their location within the River Wye Valley phosphate catchment area, following Welsh Government's advice that new site allocations should be made in Monmouth on the basis that sufficient certainty was provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025. Consequently, candidate sites within the River Wye Valley catchment area that were previously filtered out were added to the Candidate Site Register. A further amendment was made to include the submission of CS0293- Abergavenny East 2, which was submitted during the 2022 Preferred Strategy Consultation.
- 3.8. A Phosphate Briefing Update was sent out the week commencing 24th July 2023 to inform Members and all stakeholders on the RLDP consultation database of the updated approach to the environmental issue of water quality in the Rivers Wye and Usk and the implications for the RLDP and planning applications. The email advised that the Candidate Sites Register had been updated to reflect the changes noted above and that there would be an opportunity to comment at Deposit Plan stage.
- 3.9. The updated Candidate Site Register is available to view on the Council's website.

4. Pre-Deposit Participation (LDP Regulation 14)

- 4.1. LDP Regulation 14 states that, before complying with Regulation 15 (relating to Pre-Deposit Proposals), an LPA must, as it considers appropriate, engage specific and general consultation bodies for the purpose of generating alternative strategies and options. This stage in the Plan process involved the preparation of two documents:
- **Issues, Vision and Objectives:** this identifies the key issues, challenges and drivers facing the County, setting out the vision and objectives for the RLDP.
 - **Growth and Spatial Options:** this sets out a number of alternative growth and spatial options for the RLDP having regard to the Plan's evidence base and policy aspirations.
- 4.2. There is no statutory requirement for the Council to carry out public consultation at this stage. However, a series of consultation and engagement methods were undertaken in relation to each document as considered appropriate. Reflecting the challenges and changing circumstances experienced in preparing the RLDP, both pre-deposit documents have been amended and consulted upon a number of times, resulting in a number of iterations, with details of each set out below.

Issues, Vision and Objectives

- 4.3. The identification of the issues and proposed vision and objectives were heavily drawn from/reflect the Public Service Board (PSB) Well-being Plan which was extensively consulted on in 2017 and resulted in contributions from more than 1,400 people. This approach reflects Welsh Government guidance which recognises the significance of local well-being plans as a key evidence source for LDPs. In view of this, and given the non-statutory status of the Issues, Vision and Objective stage of the RLDP process, it was not considered necessary to undertake a full public consultation exercise on this initial stage of the plan preparation process. Discussions on the draft Issues, Vision and Objectives were Member focussed, through an Economy and Development Select Committee workshop and a series of Area Committee and Cluster meetings as set out below.

Issues, Vision and Objectives Non-Statutory Consultation January/ February 2019

Non-statutory engagement and consultation on the draft Issues, Vision and Objectives Report took place via:

- Workshop at Economy & Development Select Committee on 22nd January 2019 to which all Members were invited.
- Area Committee & Area Cluster meetings:
 - Lower Wye Area Committee – 23rd January 2019
 - Severnside Area Committee – 23rd January 2019
 - North Monmouthshire Area Committee – 30th January 2019
 - Central Monmouthshire Area Committee – 30th January 2019
- Report to Economy and Development Select Committee- 14th February 2019 to inform on the consultation feedback received to date, to seek further

feedback from the Committee, and seek endorsement of the Draft Issues, Vision and Objectives Paper.

- 4.4. A summary of the feedback received, together with the Council's draft response was reported to Cabinet on 5th June 2019. The feedback received covered a range of topic areas including population, economic growth, housing and affordable housing, economy and employment, and climate change.
- 4.5. The Issues, Vision and Objectives Paper was amended with some minor changes to reflect the feedback received from the targeted engagement and endorsed by Cabinet on 5th June 2019.
- 4.6. It was noted at the time that the vision and objectives will continue to be refined prior to inclusion in the Preferred Strategy to reflect the outcomes of further stakeholder engagement / consultation in relation to the growth and spatial options and a revised evidence base. The spatial element of the Vision was also to be determined following consultation to take place on the LDP growth and spatial options and set out in the Preferred Strategy.
- 4.7. Subsequent to the 5th June 2019 Cabinet meeting, the Council declared a climate emergency on 16th May 2019. It was therefore considered necessary to make further amendments to the Issues, Vision and Objectives Paper to reflect this decision, with greater emphasis given to climate change, and consolidate the changes agreed at the 5th June Cabinet meeting. Amendments were also considered necessary to set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. These were reported and agreed by Cabinet on 3rd July 2019.
- 4.8. The Issues, Vision and Objectives paper was updated again in March 2020 to add the spatial element of the Vision associated with the 2020 Preferred Strategy. A further review was then undertaken in June 2020 to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic, the findings of which were reported to Cabinet in its meeting of 17th June 2020. Following the publication of a letter from the Minister of Housing and Local Government on 7th July 2020, an assessment of the RLDP evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic was undertaken. For completeness, the review incorporated the assessment of the RLDP Issues, Vision and Objectives that was undertaken in June 2020. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Council at its meeting of 22nd October 2020.
- 4.9. Minor updates were made to the Issues, Vision and Objectives Paper in December 2022, as part of the Preferred Strategy consultation that took place in December 2022 and again in September 2024, as part of the preparation for the Deposit.
- 4.10. A summary of these events is set out below.

Issues, Vision and Objectives (IVO) Revisions	Details
IVOs Consultation Draft	Member focussed consultation reflecting that the issues and proposed vision and objectives were heavily drawn from/reflect the Public Service Board (PSB) Well-being Plan which was extensively consulted on in 2017. Amended with some minor changes to reflect the feedback received from the targeted engagement and endorsed by Cabinet on 5 th June 2019
Reviewed and amended July 2019	Updated to reflect the Council's declaration of a climate emergency in May 2019 and set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. Reported and agreed by Cabinet on 3rd July 2019.
Updated March 2020	Amendment of Vision to include the spatial element associated with the 2020 Preferred Strategy.
Review undertaken in June 2020 and October 2020	A review was undertaken in June 2020 and again in July 2020 following the publication of a letter from the Minister of Housing and Local Government (7 th July 2020) to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Cabinet on 17 th June 2020 and Council on 22 nd October 2020.
Updated December 2022	Minor updates made in December 2022, as part of the Preferred Strategy consultation that took place in December 2022.
Updated September 2024	Minor updates undertaken as part of the preparation of the Deposit Plan.

Growth and Spatial Options

- 4.11. A number of Growth and Spatial Options Papers were published for consultation over the course of the plan preparation process to reach the Deposit stage. These are discussed in turn below.

Growth and Spatial Options 2019

- 4.12. The Growth and Spatial Options Paper 2019 sets out a number of alternative growth and spatial strategy options for consideration as part of the RLDP. The growth options sections of the 2019 Paper, reflecting the findings of the Edge Analytic Report (2018), set out a range of demographic, housing and employment growth scenarios, based on the Welsh Government 2014 based population and household projections. The Paper presented a number of alternative low, mid and high growth options for consultation purposes (8 options altogether). Consideration was also given to spatial strategy options in terms of broadly where this growth should take place within the County, with five broad spatial strategy options proposed for consultation. The 2019 Growth and Spatial Options Paper was endorsed by the Economy and Development Select Committee on 17th July 2019 and endorsed for non-statutory consultation at the 3rd July 2019 Cabinet meeting.
- 4.13. The Growth and Spatial Options Paper (2019) was issued for non-statutory public consultation for a four-week period between 8th July 2019 and 5th August 2019. Details of which are set out below.

Growth and Spatial Options 2019 Non-Statutory Consultation 8th July – 5th August 2019

- Copies of the Growth and Spatial Options Consultation Report, Easy Read Guide and Executive Summary were available at County Hall, Usk, the Council's Community Hubs, One Stop Shop and public libraries and also on the Council's website.
- An animation was also available to view on the Council's website to explain key stages of the RLDP process in an accessible and easy to understand way with the aim of encouraging wider engagement with the communities.
- Notification of the consultation, inviting comments, was sent to the statutory consultees and approximately 500 other consultees, agents and individuals on the RLDP consultation database.
- Engagement and consultation also took place via the following:
 - Planning Policy Officer attendance at Area Committee and Area Cluster meetings during July 2019.
 - Attendance at the Youth Forum on 5th July 2019.
 - A Members' Workshop on 11th July 2019 (hosted by the Economy & Development Select Committee).
 - LDP Growth and Spatial Options community engagement event on 16th July 2019 at County Hall, Usk between 13:00 and 19:00 which was open for all to attend.
 - Scrutiny by Economy & Development Select Committee on 17th July 2019.
 - Abergavenny Town Council hosted a meeting/workshop on Thursday 1st August 2019.

- Internal discussions within the Council through Departmental Management Team/Senior Leadership Team.

- 4.14. In response to the non-statutory consultation and engagement a total of 93 responses were received, which were considered and reported in the Growth and Spatial Options Report of Consultation (March 2020) and helped to inform the preparation of the Preferred Strategy (March 2020). The Growth and Spatial Options Background Paper (March 2020) complements the Report of Consultation and adds further analysis of the options considered, including the extent to which they achieve the RLDP objectives and their performance against the Initial Sustainability Appraisal (ISA) themes.
- 4.15. In light of the consultation responses received on the Growth and Spatial Options Consultation Paper (June 2019), informal feedback from Welsh Government officials, receipt of a letter from the Minister for Housing and Local Government (July 2019), which seeks to promote sites that include 50% affordable housing, and the Council's further consideration of the County's key issues/challenges and options, a decision was taken to model two additional growth scenarios, referred to as Option 5a and Option 5A+. Similarly, following consideration of the consultation responses received on the spatial options, and the publication of the draft National Development Framework (NDF), which identifies the potential for a green belt in the south/mid of the County, a decision was taken to assess a further spatial option which focuses growth in the north of the County (referred to as Option 6). A further spatial option emerged to reflect the preferred growth option (growth option 5A+), to deliver growth proportionately across the most sustainable urban and rural settlements and distribute growth by housing market area to reflect the need for intermediate affordable housing.
- 4.16. As the additional growth and spatial options emerged as a result of the consultation undertaken in 2019, these are not discussed in the Report of Consultation. Further details on the methodology and analysis of the additional growth and spatial scenarios were, however, set out in the Growth and Spatial Options Background Paper (March 2020) and considered as options in the preparation of the 2020 Preferred Strategy.

Growth and Spatial Options – December 2020

- 4.17. In March 2020, the RLDP process had reached the Preferred Strategy stage, with formal consultation commencing on 5th March 2020, based on the outcome of the 2019 Growth and Spatial Options consultation. However, progress on the RLDP was subsequently paused in March 2020 due to the Covid-19 pandemic. During this pause in the plan process, Welsh Government published a correction to the 2018-based population and household projections in August 2020. The Welsh Government population and household projections form the starting point for the RLDP evidence on growth levels, onto which policy choices can be added as needed, for example to ensure that the County's identified issues are addressed, objectives met, and vision achieved. The publication of the Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP was robust and

based on the most up to date information. Consequently, the Growth and Spatial Options stage of the Plan process was revisited in 2020.

- 4.18. The 2020 Growth and Spatial Options Paper considers the 2018-based projections, as well as factoring in a specific policy-led affordable housing element added to all selected growth options reflecting the affordable housing need set out in the 2020 Monmouthshire Local Housing Market Assessment (LHMA). Six alternative growth options were selected for non-statutory consultation to assist in determining the housing and employment requirements of the RLDP. Similarly, a review of the spatial options was undertaken, with two previous options involving the creation of a new settlement discounted and an additional option, which focused growth in the North of the County was included as an option, reflecting the results of the 2019 consultation discussed above.
- 4.19. The Paper specified growth option 5 – population-led with added policy assumptions, and spatial option 2 – distribute growth proportionately across the County’s most sustainable settlements, as the preferred growth and spatial options.
- 4.20. The revisited Growth and Spatial Options Paper, along with an Easy Read version, was endorsed for non-statutory public consultation at the Cabinet meeting on 16th December 2020. The consultation took place over a 4-week period between January and February 2021, with consultation arrangements set out below.

Growth and Spatial Options Paper 2020 Non-Statutory Consultation – January/February 2021

- Consultation and engagement arrangements undertaken were revised in light of the Covid-19 pandemic and reflected the Coronavirus Regulations (2020) and Ministerial advice.
- Copies of the consultation documents were available to view at County Hall, Usk via a pre-booked browsing service and during the opening hours of all Community Hubs.
- Notifying all parties on the RLDP database of the consultation (49 letters and 714 emails notifications were sent).
- Consultation was publicised via corporate social media as well as Planning Policy’s social media account.
- Making all relevant information available on the Council’s website including an Easy Read version and an animation to explain the different options.
- A Members’ Workshop – 8th December 2020 (hosted by the Economy & Development Select Committee).
- Scrutiny by Economy & Development Select Committee on 10th December 2020.
- Two consultation webinars open to all to attend:
 - 14th January, 6pm (84 views in total – 69 live and 14 via the recorded link)
 - 20th January 2021, 2pm (87 views – 82 live and 5 viewed via the recorded link)
- Planning Policy Officer virtual attendance at the Town and Community Council Engagement Meeting – 21st January 2021.
- Internal discussions within the Council through Departmental Management Team (DMT) and Senior Leadership Team (SLT).

- 4.21. As a result of the non-statutory consultation and engagement a total of 105 responses were received. These were summarised and grouped by the growth and spatial option they relate to, with a Council response to each general theme of comments submitted, reflecting the strategic nature of the non-statutory consultation stage. Full details were set out in the Growth and Spatial Options Report of Consultation (June 2021) and the Growth and Spatial Options Background Paper (June 2021) which complements the earlier Report of Consultation and adds further analysis of the options considered, including the extent to which they achieve the RLDP objectives and their performance against the Initial Sustainability Appraisal (ISA) themes. Following the consideration of the findings of the 2021 Growth and Spatial Options consultation, a Preferred Strategy was approved for consultation in June 2021.

RLDP Options Council Report September 2022

- 4.22. On the 10th February 2022, an informative email/letter was sent to stakeholders on the RLDP consultation database, providing an update on the RLDP. The email/letter informed stakeholders that the Council was considering the implications of the Welsh Government Planning Division's proposed prescribed maximum growth level on the RLDP's objectives. It advised that a future report to Council in late summer 2022 would present options for progressing the RLDP and would seek a Council decision on how to proceed.
- 4.23. Following consultation on the 2021 Preferred Strategy, a report was taken to Council on 27th September 2022, seeking endorsement of the proposed way of progressing the RLDP, having regard to a number of challenges that arose and impacted on the progression of the RLDP. In summary, these involved a Welsh Government objection to the level of growth proposed in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk catchment areas.
- 4.24. The RLDP Options Report considered how to progress the RLDP having regard to the above challenges, whilst also ensuring the RLDP delivers on the Council's and RLDP objectives. The Report considered 4 options:
- Option 1: Proceed with the 2021 Preferred Strategy based on a housing requirement of 7,605 homes increasing to 8,366 homes including a 10% flexibility allowance and spatial strategy to distribute growth proportionately across the County's most sustainable settlements.
 - Option 2: Proceed with an amended approach based on a demographic-led strategy and an amended spatial strategy to take account of the phosphate constraint in the River Wye Catchment (a solution to the River Usk catchment being known).
 - Option 3: Proceed with the Welsh Government prescribed maximum dwelling requirement of 4,280 homes increasing to 4,700 including a 10% flexibility allowance, combined with an amended spatial strategy to consider the phosphate constraint in the River Wye Catchment.
 - Option 4: Restart the RLDP process.
- 4.25. A detailed options appraisal of the four options was undertaken and was attached to both the Council Report and the Growth and Spatial Options Paper (September 2022). This sets out the demographic, dwelling and jobs growth levels associated with each option, together with the benefits and risks, including in relation to the

ability of each option to meet our objectives and address our key issues, the impact on plan preparation and deliverability of the RLDP.

- 4.26. The options appraisal concluded that Option 2 was the most appropriate option for progressing the RLDP in light of the aforementioned challenges. This was agreed by Council at its meeting of the 27th September 2022 and formed the basis of the 2022 Preferred Strategy.
- 4.27. Given the extensive consultation that had taken place on the non-statutory initial stages of the RLDP and the feedback from the 2021 Preferred Strategy consultation, consultation on the RLDP Options Report focussed on Members and senior leadership. Details are set out below.

RLDP Options Council Report September 2022 Targeted Discussions

- Informal Cabinet
- Cabinet Member for Sustainable Economy
- Communities and Place Departmental Management Team and Senior Leadership Team
- All Member Workshop – 12th September 2022
- Special Meeting of Place Scrutiny Committee – 26th September 2022
- Full Council – 27th September 2022

5. Preferred Strategy Consultation and Engagement (LDP Regulation 15)

- 5.1. LDP Regulation 15 requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before determining the content of its LDP for Deposit. This is the first of the statutory consultation stages, providing the strategic direction for the County, setting out how much growth is needed and the broad location of where this growth is likely to be.
- 5.2. As indicated above, three Preferred Strategy stages have taken place throughout the course of preparing the RLDP. In the interest of brevity, a summary of the first two consultation stages is set out below, with full details of the 2022 Preferred Strategy consultation provided in the Initial Consultation Report (October 2024).

Preferred Strategy March 2020

Preferred Strategy March 2020 Statutory Consultation

- Consultation and engagement took place in accordance with the CIS.
- Issued for 6-week consultation 9th March – 22nd April 2020.
- 20th July 2020 – following advice from the Minister of Housing and Local Government, decision made to cease the RLDP consultation. Notice of cessation of the RLDP Preferred Strategy consultation was sent to consultees on the RLDP consultation database and publicised on the Council's website.

- 5.3. The 2020 Preferred Strategy was ceased due to the Covid-19 pandemic and as noted above in relation to the Growth and Spatial Options, in August 2020 Welsh Government published a correction to the 2018-based population and household projections. As these form the starting point of the RLDP evidence base, the Growth and Spatial Options were revisited in December 2020 and informed a revised Preferred Strategy, which was approved for consultation in June 2021.

Preferred Strategy June 2021

Preferred Strategy June 2021 Statutory Consultation

- Approved by Council at its 24th June 2021 meeting for an 8-week public consultation period.
- Public consultation undertaken between 5th July 2021 and 31st August 2021.
- The Preferred Strategy, an Easy Read Guide, Executive Summary, animation and Initial Integrated Sustainability Assessment and Habitats Regulations Assessment available to view on the Council's website.
- Notification of the consultation, inviting comments, sent to the statutory and approx. 1,000 other consultees, agents, and individuals on the RLDP consultation data base.
- Copies of the RLDP Preferred Strategy, Easy Read Guide and Executive Summary available for public inspection at County Hall Usk, the Council's Community Hubs, One Stop Shop and public libraries and also on the Council's website.

- Multiple social media posts on the MCC corporate and planning policy accounts advising of the start of the consultation and publicising the upcoming community events and how to book.
- Due to the Covid-19 pandemic and associated ongoing restrictions, community engagement events were held both in person with limited numbers and mandatory booking, and virtually via Microsoft Teams.
- 7th July 2021 additional emails sent to specifically publicise the consultation events with a link to the booking form.
- The virtual community engagement events were held on:
 - 8th July 2021 (18:00-19:30pm)
 - 20th July 2021 (15:00-16:30pm)
- The community engagement events were all publicised on the Council's social media channels and were held in the following locations:
 - Usk – Sessions House on 12th July 2021
 - Chepstow – Drill Hall on 14th July 2021
 - Magor – Baptist Church 15th July 2021
 - Monmouth – Leisure Centre 19th July 2021
 - Caldicot – Choir Hall 21st July 2021
 - Abergavenny – St Mary's Priory Centre 27th July 2021
 - Raglan- Village Hall on 29th July 2021
- Engagement and consultation also took place via the following:
 - A Members' Workshop on 22nd June 2021
 - A Housing Stakeholder Group meeting on 23rd June 2021
 - A MCC department-wide officer meeting on 7th July 2021
- An interactive mapping feature ('Placecheck') also formed a part of the consultation. Whilst it was made clear that preferences cast using 'Placecheck' would not be considered as formal representations, the software was used as an informative and engaging tool and well used. The tool illustrated the potential Strategic Growth Areas on a map and users were able to cast preferences (Likes/Dislikes) on each of the potential strategic growth areas. Over 3,000 preferences were cast by nearly 1,000 users.
- 16th July members of the Monmouthshire Business Resilience Forum were emailed informing them of the on-going Consultation and the Second Call for Candidate Sites.
- 16th August – an area cluster meeting was held. All Town and Community Councils were invited to the meeting which provided the opportunity to feedback and comment on the Preferred Strategy.

5.4. In response to the 2021 Preferred Strategy, Welsh Government's Planning Division raised significant concerns regarding the proposed level of growth and the strategy's 'general conformity' with policies 1 and 33 of Future Wales. The response suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys. Welsh Government's response prescribed a maximum growth of 4,274 dwellings for Monmouthshire to 2033. This was considerably lower than the 2021 Preferred Strategy growth dwelling requirement of 7,605 homes.

5.5. In addition, in December 2020 Natural Resources Wales adopted tighter targets for water quality of the River Wye and River Usk catchment areas. NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not

deteriorate any further, with development required to demonstrate phosphate neutrality or betterment.

- 5.6. The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the 2021 Preferred Strategy directed growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was, therefore, given as to how the RLDP could progress in light of this issue. Following discussions with Dŵr Cymru Welsh Water (DCWW) and NRW, it became apparent that whilst a workable solution to this water quality issue was achievable for the Llanfoist Wastewater Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) at that time.

Preferred Strategy December 2022

- 5.7. In light of the Welsh Government objection to the level of growth in the 2021 Preferred Strategy and the water quality issues in the Rivers Wye and Usk catchment areas, a revised strategy was needed. The RLDP Options Report, discussed above in the context of the Growth and Spatial Options, was therefore taken to Council on 27th September 2022, seeking endorsement of the proposed way of progressing the RLDP, having regard to the challenges that had arisen.
- 5.8. In September 2022, Council endorsed the proposal to proceed with a new growth and spatial strategy that responds to these challenges and maximises delivery of these core issues and objectives within the environmental and national policy constraints. The 2022 Preferred Strategy proposed a lower level of growth and an amended spatial strategy that responds to these challenges. Key elements of the Strategy included:
- A housing requirement of 5,400 homes, with provision for 5,940 homes including a 10% flexibility allowance.
 - Enable the provision of approximately 6,000 additional jobs.
 - Focus growth the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot (including Severnside). Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations were proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.
 - Identified Preferred Strategic Site Allocations in the primary settlements of Abergavenny, Chepstow and Caldicot.
 - Strategic policies establishing strategic policy objectives including 50% affordable homes on new allocations and requirement for new homes to be net zero carbon ready.
- 5.9. The 2022 Preferred Strategy was approved for consultation by Council on 1st December 2022. Full details on the consultation and engagement methods are set out in the Initial Consultation Report (October 2024) are therefore not repeated here.

Preferred Strategy Statutory Consultation December 2022

Consultation and engagement on the Preferred Strategy (2022) took place between 5th December and 30th January 2023.

Consultation and engagement on the 2022 Preferred Strategy took place in accordance with the CIS, full details of which are set out in the Initial Consultation Report, which can be viewed on the Council's website.

5.10. The consultation resulted in approximately 220 responses on the Preferred Strategy. An overview of the of the key themes raised and an LPA response is set out in Appendix 1 of the Initial Consultation Report. Due to the length of the Report this information is not repeated here, with readers directed the Initial Consultation Report for full details. Of particular note to emerge from the 2022 Preferred Strategy consultation, is the following:

- Welsh Government responded to note that 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.
- Welsh Government did not object to the Preferred Strategy's settlement hierarchy and distribution of housing growth, which focused growth in the Tier 1 settlements and the Severnside cluster.
- Welsh Government advised that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.
- A range of comments were also made by a variety of organisations, agents and private individuals on the Preferred Strategy, with some representors in broad support, others suggesting the Strategy is not ambitious enough and other suggesting it is too high. There was a recognition on both sides that the Preferred Strategy represents a compromised approach to addressing the County's issues and challenges whilst also addressing Welsh Government's objections to the previous Preferred Strategy (2021).
- General support was given to the distribution of growth, focused on the Primary Settlements, however, more evenly dispersed growth across settlements, including Monmouth and lower tiers was also raised.
- Concern was raised at the level of growth focussed in the south of the County.
- In terms of the housing supply components, the consensus was that the flexibility allowance is too low with a 20% or 25% flexibility allowance suggested as more appropriate rates to address concerns of an over reliance on a small number of strategic sites and the potential impact on delivery homes and affordable homes within the plan period.

Phosphates Briefing Note – July 2023

5.11. In July 2023 a Phosphates Briefing Update was sent out to all stakeholders providing an update on the water quality issues affecting the River Wye and River Usk and that there was now firm commitment from Dŵr Cymru Welsh Water (DCWW) that the

necessary improvements would be undertaken at the Monmouth Wastewater Treatment Works (WWTW) to allow for growth in Monmouth in the RLDP. The email advised that following the removal of the constraint on the Monmouth WWTW, it was proposed that the Deposit Plan would identify a new strategic site allocation for approximately 250-300 homes and include three 'roll-over' sites in the settlement of Monmouth.

- 5.12. A Scrutiny workshop open to all Members was also held on 12th July 2023 to discuss the briefing update.

Preferred Strategy Post Consultation Update to Council October 2023

- 5.13. In October 2023, in accordance with the Delivery Agreement a non-statutory report was taken to Council to seek endorsement of a small number of key post-consultation updates to the Preferred Strategy as a basis for the preparation of the Deposit Plan. Full details of the changes are discussed in the Council Report¹. A summary of the changes are as follows:

- Identification of a strategic site on land at Leasbrook in Monmouth following a change in position in relation to phosphates enabling development in the Monmouth area.
- Change of the strategic site allocation in Chepstow from Bayfields to the Mounon Road site.
- An increase in the flexibility allowance from 10% to 15%.
- Enhancing the sustainability credentials/energy efficiency of new homes to net zero carbon rather than net zero carbon ready.
- Factual updates to the housing figures to take account of the 2022/23 housing monitoring data.

- 5.14. Council agreed these changes and they formed the basis of the preparation of the Deposit Plan. Reflecting the proposed changes noted above, the updated Preferred Strategy proposed:

- Provision for approximately 5,400 homes, making provision for 6,210 homes including a 15% flexibility allowance.
- Sets out the planning policy framework to enable the provision of approximately 6,240 jobs by allocating sufficient employment land and by including policies to facilitate economic growth.
- Focuses growth in the County's most sustainable settlements of Abergavenny, Caldicot (including Severnside), Chepstow and Monmouth.
- Preferred Strategic Sites identified for the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth.
- New homes to be net zero carbon.

¹ <https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=143&MIId=5410>

6. Candidate Site Register Consultation and Engagement (Regulation 15)

- 6.1. The Development Plans Manual notes that at the Preferred Strategy stage (LDP Regulation 15) the LPA must publish the Candidate Site Register (CSR) and invite comments on it as part of the statutory consultation (see LDP Regulation 2, definition of pre-deposit proposal documents). Accordingly, alongside the consultation on the Preferred Strategy, consultation also took place on the Candidate Site Register (December 2022).
- 6.2. As with the Preferred Strategy (2022), details of the consultation methods are set out in the Initial Consultation Report and are therefore not repeated here.
- 6.3. In response to the consultation exercise, 650 representations were received in relation to the Candidate Site Register. In the main, respondents were objecting to the candidate site submissions, with full details of the comments set out in Section 4: Candidate Sites Register Summary of Representations, of the Initial Consultation Report.
- 6.4. As noted above in relation to the Candidate Site Register and 2022 Preferred Strategy, a Phosphate Briefing Update was sent out the week commencing 24th July 2023 to inform Members and all stakeholders on the RLDP consultation database of an updated approach to the water quality issue in the Rivers Wye and Usk and the implications for the RLDP and planning applications. The email advised that the Candidate Sites Register had been updated to reflect the changes, with sites previously filtered out in Monmouth due to the constraint, now included for consideration to inform the allocations of the Deposit Plan, and the addition of CS0293 – Land East of Abergavenny (2), which was submitted at the 2022 Preferred Strategy consultation stage. Stakeholders were advised that there would be an opportunity to comment on the updated Candidate Site Register at the Deposit Plan stage.

7. Deposit Consultation and Engagement (LDP Regulation 17)

7.1. Regulation 17 of the LDP Regulations (2005) requires that, prior to submitting its LDP to Welsh Government, the Council must publish its deposit draft for public consultation. The Deposit Plan was endorsed by Council at its meeting of 24th October 2024, for statutory consultation/engagement with communities and key stakeholders over a six-week period from 4th November – 16th December 2024. The Deposit Plan builds on the stages and evidence undertaken up to this point and contains the strategy, policies, and allocations, supported by relevant background evidence. It provides:

- Site allocations to meet identified needs.
- Defined areas of protection.
- Detailed policy framework including development management policies.
- Delivery and monitoring mechanisms.

Consultation Documents

7.2. The consultation documents that were available during the Deposit consultation are set out below. Paper copies of the Deposit Plan, Deposit Summary, Deposit Integrated Sustainability Appraisal Report and Deposit Habitats Regulations Assessment were available for public inspection at County Hall Usk, the Council's Community Hubs and public libraries. All documents listed below were available to view on the Planning Policy website and available to view at the 'drop-in' sessions.

Deposit Consultation Documents	
Key Stage	
Deposit Plan	Replacement Local Development Plan Deposit Plan (October 2024)
	Deposit Plan Summary (October 2024)
	Animation (October 2024)
	Initial Integrated Sustainability Appraisal (ISA) Report for the Monmouthshire Deposit Plan (September 2024); ISA Technical Annex – Candidate Site Assessment (September 2024); ISA Non-Technical Summary (September 2024)
	Habitats Regulations Assessment (HRA) of the Replacement Local Development Plan Deposit Plan (September 2024)
	Initial Consultation Report (October 2024)
	Self-Assessment of the Deposit Plan against the Test of Soundness (October 2024)
Delivery Agreement	Delivery Agreement (Updated October 2024)

RLDP Previous Stages	RLDP Issues, Vision and Objectives (Updated September 2024)
	RLDP Growth and Spatial Options (September 2022)
	Preferred Strategy (December 2022)
	Preferred Strategy Post Consultation Update to Council (October 2023)
Candidate Sites	Candidate Site Register (Updated July 2023)
	Candidate Site Assessment Methodology (Updated July 2023)
	Candidate Site High-level Assessment (As amended 2023)
	Candidate Site Assessment Report (October 2024)
Other Evidence	
Housing	Monmouthshire Local Housing Market Assessment Refresh 2022-2037
	Housing Background Paper (October 2024)
	Demographic Evidence Report, Edge Analytics (Updated November 2021)
	Preliminary High Level Viability Assessment (Burrows-Hutchinson, 2024)
	Gypsy and Traveller Accommodation Assessment (2021 - 2026)
	Gypsy and Traveller Background Paper (October 2024)
	Sustainable Settlement Appraisal (Updated December 2022)
Natural Environment	Landscape Sensitivity Study Update, White Consultants (October 2020)
	Areas of Amenity Importance Review (October 2024)
	Green Wedge Assessments (LUC 2024)
	Green Wedge Method Statement (LUC 2024)
	Open Space Study (October 2024)
	Emerging Green Infrastructure Strategy 2024 Executive Summary; Emerging GI Strategy 2024 Volume 1 and Volume 2.
Economy	Economies of the Future: Economic Baseline Report (March 2018)
	Monmouthshire 2040: Economic Growth and Ambition Statement (November 2019)

	Inward Investment Prospectus 2020: Growing your business in Monmouthshire (March 2020)
	Regional Employment Study, BE Group (March 2020)
	Employment Land Review, BE Group (November 2022)
	Employment Land Background Paper (May 2022)
	Monmouthshire Economy and Employment and Skills Strategy 2023
	Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (May 2024)
Renewable Energy	Renewable and Low Carbon Energy Assessment, The Carbon Trust (October 2020) and Non-Technical Summary
	Renewable Energy Background Paper (October 2024)
Retail	Retail Background Paper (January 2024)
	Monmouthshire Retail Study (2024)
Minerals	Minerals Regional Technical Statement (September 2020) and Welsh Government RTS Clarification Letter – 11 th November 2021
	Minerals Background Paper (October 2024)
Waste	The South-East Wales Waste Planning Report (April 2016)
Infrastructure	Infrastructure Delivery Plan Background Paper (October 2024)
Transport	Monmouthshire Local Transport Strategy 2024-2029
	Strategic Transport Assessment Appendix A Technical Note (June 2024); Strategic Transport Assessment Non-Technical Report (June 2024).
Green Belt	Letter to Julie James AM from Leader of MCC and Leaders of Monmouthshire County Council Labour group (September 2019)
	Julie James AM reply to September 2019 Monmouthshire County Council letter (October 2019)
Flood Risk	Strategic Flood Consequence Assessment Stage 1 Report (November 2022); Strategic Flood Consequence Assessment Stage 1 Appendix F1 – Monmouthshire (November 2022)
	Strategic Flood Consequences Assessment Candidate Sites Screening

Consultation and Engagement Methods

- 7.3. In accordance with the CIS, a number of engagement methods were utilised for the Deposit Plan consultation to encourage a broad response from different stakeholders and to seek a range of views on the proposals. The engagement methods undertaken are set out below.

Consultation Methods
Member Involvement
Member Workshops: Three Member Workshops, hosted by Place Scrutiny Committee, were undertaken prior to the Deposit going before Full Council for approval to undertake public consultation on the Plan. The workshops were held virtually, each covering a broad topic area of the Plan: • 17th September 2024 – Workshop focus: Proposed RLDP timetable, Housing Allocations and Housing Policies. • 26th September 2024 – Workshop focus: Employment Allocations, Renewable Energy and Tourism Policies • 2nd October 2024 – Workshop Focus: Areas for Protection, Climate Change, Green Infrastructure and Public Consultation and Engagement Place Scrutiny: A report was taken to Place Scrutiny on 10th October 2024 to facilitate pre-decision scrutiny on the Deposit Plan. Full Council: Full Council meeting of 24th October 2024 endorsed the commencement of statutory consultation/engagement on the Deposit Plan with communities and key stakeholders for a six-week period between 4th November – 16th December 2024.
Press Release
Prior to the start of the consultation period, a press release was prepared for local media.
Notification via Email and Letter
1st November 2024: Bilingual notification of the consultation, inviting comments, was sent to the statutory and approximately 1,000 other consultees, agents, and individuals on the RLDP consultation data base. This includes statutory consultees, including the Welsh Government, Natural Resources Wales, all Town and Community Councils in Monmouthshire, and neighbouring Local Authorities.
Public Information Exhibitions – ‘Drop-in’ Sessions
Nine public information exhibitions (‘drop-in’ sessions) were held in various locations across the County. All exhibitions were held between 2pm to 7pm and were widely advertised including via posters, social media and the Planning Policy website. • 12th November 2024 – Raglan, Old Church School Community Centre, Chepstow Road Raglan • 14th November 2024 – Abergavenny Market Hall, Cross Street, Abergavenny • 18th November 2024 – Usk Community Hub, Maryport Street, Usk • 21st November 2024 – Palmer Centre, High Street, Chepstow • 25th November 2024 – Shire Hall, Agincourt Square, Monmouth • 27th November 2024 – Magor Baptist Chapel, The Square, Magor

- 29th November 2024 – Portskewett Recreational Hall, Manor Way, Portskewett
- 2nd December 2024 – Goytre Village Hall, Newton Road, Penperlleni
- 4th December 2024 – Caldicot Town Council Building, Sandy Lane, Caldicot

The exhibitions displayed information bilingually with large display boards, such as maps of the proposed strategic sites, together with paper copies of the Deposit Plan, Proposals Map and supporting evidence. Copies of the Deposit Summary and leaflets were available to take away. The exhibitions allowed the public and local residents to 'drop-in' within the advertised time to discuss the Deposit Plan and any of the supporting information with a Planning Officer. A number of Officers were available at each of the nine exhibitions to explain the process and answer /clarify any queries. Photos of a selection of the 'drop-in' events are contained in Appendix 2. All events were well attended.

Virtual Consultation Sessions

Virtual consultation events were held as an alternative to the 'drop-in' sessions or allow another opportunity to engage with Officers. Three events were held, one with representatives of the Town and Community Councils and two open to all to attend.

- **5th November 2024 – Town and Community Councils** specific event. Information was presented on the RLDP process, setting out the key policy objectives of the Plan and details of how to respond to the consultation. Town and Community Councils were also invited to disseminate information on the Deposit Plan to their communities and to help raise awareness of the consultation.
- **13th November 2024, 2pm – 3.30pm, and 9th December 2024, 6pm – 7.30pm, – virtual consultation events open to all to attend.** An introductory presentation of the RLDP process and an overview of the Deposit Plan, and an animation explaining the Deposit Plan process was played. The events were facilitated by MCC's Communication Team, with questions put to the Head of Placemaking and Planning Policy Officers.

Engagement with Representatives of School Councils

In order to provide an opportunity to engage with young people an email was sent to Monmouthshire's comprehensive schools seeking to arrange for MCC's planning officers to meet with school council representatives from each school year, to present the Plan's key proposals and seek feedback to inform the consultation process.

Two schools responded to the invite, with an event undertaken in both:

- Caldicot Comprehensive School- 11th December 2024
- Chepstow Comprehensive School- 11th December 2024

A short presentation was given in both sessions, focussing on the specific local area. A discussion was held, focussed on a few key questions, with feedback forms provided to gain feedback on key issues/challenges in their areas and how they think the RLDP can help Monmouthshire to address its challenges. Large paper maps were also provided

with the pupils given the opportunity to illustrate how they would masterplan the relevant sites in their area.

The key issues raised during the school engagement is set out in Appendix 3.

Business Engagement Events

To gain feedback and engage specifically on the economic element of the Plan, a business engagement event was organised in partnership with Monmouthshire's Economy, Employment and Skills Team. Feedback from the event that took place on the 6th December 2024, can be found in Appendix 4.

In addition, the Head of Placemaking attended the Business Resilience Forum meeting of 13th November 2024 to give a presentation on the RLDP and inform them of the consultation process.

Climate Change Champions Meeting

28th November 2024 – Head of Placemaking gave a presentation to the Council's Climate Change Champions meeting to provide an overview of the RLDP's policies and proposals and to raise awareness of the public consultation.

Social Media

Information regarding the Deposit Plan was posted on X and Facebook social media platforms, including MCC's corporate accounts. Multiple posts were put out throughout the consultation period including posting the animation to advertise the consultation period and the specific 'drop-in' and virtual engagement events.

Consultation Material

As part of the consultation and engagement on the Deposit Plan, a range of formats and methods were used to provide information on the content of the Plan and also how to provide contribute to the process. These included bilingual versions of the following:

- Summary document: this provides an overview of the key elements of the Plan.
- Posters: advertising the 'drop-in' events with a QR code available to scan for further details. A copy can be viewed in Appendix 5.
- Leaflets: these were prepared for each of the nine 'drop-in' sessions and contained a map showing the allocations proposed in the area, key information about the consultation and a QR code providing more details on how to respond to the Plan. An example of a leaflet is contained in Appendix 6.
- An A-board advertising the drop-in sessions was placed in a visible spot outside each 'drop-in' venue to raise awareness that the event was taking place that day. Appendix 7 provides an example.
- Representation Response Form: two versions of the response form were available, a paper version which was available from the Community Hubs or the 'drop-in' sessions or downloadable off the website to fill in electronically and email in. The

second method was an online version, which was available via the Council's website to fill in and submit electronically.

- **Notice of Deposit Matters:** this was sent out to all stakeholders on the RLDP consultation database and available to view at the 'drop-in' sessions and at County Hall and the Community Hubs. A copy is contained at Appendix 8.

County Hall and Community Hubs

The consultation documents were also available to view at County Hall, Usk and MCC Community Hubs (Abergavenny, Caldicot, Chepstow, Gilwern, Monmouth and Usk) during normal opening hours.

Site Allocation Notices and Adjacent Properties Letters

In order to be transparent as possible with regard to the RLDP's proposed site allocations the following bilingual methods of correspondence were undertaken:

- **Site Allocation Notices:** a number (dependent on the size of the allocation) of sites notices were placed in close proximity to the land associated with each proposed RLDP allocation. These contained a map identifying the boundary of the proposed allocation and details of how to view the Deposit Plan and supporting information, along with a QR code directing readers to the Council's Planning Policy website for further information. An example of a site notice is provided in Appendix 9.
- **Adjacent Properties Letters:** a letter was sent to all properties within a 100m buffer zone of each of the proposed RLDP allocations. These also included a copy of the site noticed referenced above and a leaflet identifying the site and proposed use and how to find out more about the policies and proposals contained within the Deposit Plan. A sample letter is contained in Appendix 10.

- 7.4. The various methods of consultation and engagement proved highly effective, with 956 duly made responses received on the Deposit Plan, from a mixture of statutory consultees, organisations, agents, community groups and private individuals responding to the consultation. These responses resulted in over 4,000 individual representations being made on different elements of the Plan. A breakdown by Policy is set out in Appendix 11 and a summary overview of the key topic areas is set out below.

RLDP Policy/Section	Approximate No. of Representation by Type			
	Comments	Objections	Support	Total
Key Issues, Vision and Objectives	33	100	56	189
Growth and Spatial Strategy (S1 and S2)	13	336	47	396
Managing Settlement Form (OC1, GW1)	3	37	25	65

Placemaking and High-Quality Design (S3, PM1 – PM3, HE1 – HE3)	10	56	27	93
Climate Change (S4, NZ1, CC1 – CC3)	22	153	46	221
Green Infrastructure, Landscape & Nature Recover (S5, GI1- GI2, LC1 – LC5, NR1 – NR3, PROW2)	24	96	58	178
Infrastructure (S6, IN1)	13	142	16	171
New Housing (H1 – H8)	13	38	9	60
Affordable Housing (S7, H9)	14	87	28	129
Residential Allocations (S8, HA1 – HA18)	79	1003	52	1134
Gypsy & Travellers (S9, GT1)	4	60	7	71
Employment & Economy (S10, EA1 – EA2, E1 – E2)	30	102	28	160
Rural Enterprise (S11, RE1 – RE6)	2	7	0	9
Visitor Economy (S12, T1 – T2)	3	39	21	63
Sustainable Transport (S13, ST1 – ST6)	17	80	32	129
Retail & Commercial Centres (S14, RC1 – RC4)	4	34	18	56
Community Infrastructure (S15, CI1 – CI4)	7	49	28	84
Minerals (S16, M1 – M3)	5	13	11	29
Waste (S17, W1 – W3)	4	19	14	37

- 7.5. Four petitions were submitted in response to the Deposit consultation, with the representations included within the figures noted above and in Appendix 11. Brief details are summarised below.

Organisation/ Representor	No. of Signatories	Brief Details
Save Our Unique Landscape (SOUL)	Submitted on behalf of 250 members who live in Abergavenny (although no details of these were provided)	• In principle support for the housing provision figure of 6,210 homes. • Consider the jobs figure to be very ambitious. • Conditional support for the allocation of HA1 – Land to the East of Abergavenny, subject to viability and connectivity. • Object to HA5 – Land at Penlanlas, due to impact on the BBNP setting. • Object to the limited amount of employment land allocated in Abergavenny.
Neil Niblett	14 signatories	• Object to employment allocation EA1a – Land at Nantgavenny Business Park, Abergavenny. • Objections primarily relate to the highway impact of the proposal on Nantgavenny Lane and the Nantgavenny Lane/Hereford Road junction. • Other concerns related to the impact on residential amenity, ecological impact and loss of greenfield land.
Richard Liddell	56 signatories	• Object to settlement boundary changes made to accommodate the proposed mixed-use allocation HA3 – Land at Mounton Road, Chepstow. • Object to proposed site allocation HA3 – Land at Mounton Road, Chepstow. • Concerns raised included the visual impact of the site, loss of an important green wedge, impact on the highway network and impact on the historic environment.
Residents of Mardy	40 signatories	• Object to housing allocation HA5 – Land at Penlanlas, Abergavenny. • Concerns raised included impact on the setting of the BBNP, highway impact, loss of a greenfield site and ecological impact.

- 7.6. All individual representations have been published within a Register of Representations as a factual record of the representations received on the Deposit Plan.

8. Summary of Deposit Consultation Representations (LDP Regulation 17)

8.1. This section provides an overview of the main issues arising from the public consultation and engagement undertaken on the Deposit Plan. On a high-level basis, the following key themes emerged from the consultation:

- **Growth Strategy:** this focussed on two opposing views. The first noting that the growth level is too high and in excess of the housing target specified by Welsh Government in response to the 2021 Preferred Strategy and the second view noting that the growth level is too low to sufficiently address the RLDP's core issues and objectives.
- **Spatial Strategy:** there was some support for the spatial strategy and recognition that growth is primarily focused in the County's Primary Settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including Severnside). Concerns were raised, however, that a disproportionate amount of growth is focussed on the south of the County.
- **Reliance on two Large Strategic Sites in Abergavenny and Caldicot/Portskewett:** concerns were raised at the over reliance of two strategic sites allocated under policies HA1 – Land to the east of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, and the impact this will have on the delivery of the growth strategy.
- **Site Allocations:** all proposed sites allocations received objections with common concerns raised including the loss of greenfield land, ecological, highway and traffic and landscape impacts, and inadequate infrastructure provision to support the proposals. Representations in support of site allocations were, however, also received, for example the proposed site allocation on land to the East of Abergavenny (HA1) received some support in recognition of its location adjoining Abergavenny Train Station and the sustainable transport options that this provides.
- **Alternative Sites:** A series of candidate sites were suggested as alternatives to the proposed site allocations, usually by site promoters pursuing the allocation of a different site or the local community suggesting a different site to that allocated.
- **Affordable Homes:** General support was provided for the need for additional affordable housing, with many supporting the 50% affordable housing policy requirement. However, others questioned the need for this level and suggested that this be reduced to the levels contained in the Adopted Local Development Plan.
- **Climate Change and Net Zero Homes:** the Council's climate change and net zero homes policy requirements were generally welcomed. However, concerns were expressed regarding the potential conflict between the policy objectives and the loss of greenfield land through the allocation of sites. Concerns were also raised in relation to the implementation of the Net Zero Homes policy and ongoing monitoring arrangements.
- **Viability:** Whilst there was support for the Council's 50% affordable housing requirement, concerns were raised regarding the impact this policy requirement together with other key requirements including net zero homes, would have on viability.

- **Employment and Economy:** views noted that the RLDP's job figure is optimistic, with concerns raised in relation to how it will be achieved. Clarification was also sought on how the employment land figure was arrived at, as well as concerns raised in relation to the lack of employment land allocated in Abergavenny and the disproportionate amount allocated in Raglan.
 - **Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA):** Comments on the ISA primarily focussed on the assessment of alternative sites, suggesting that alternative scores should have been applied. With regards to the HRA, Natural Resources Wales (NRW) raised concerns regarding the robustness of the assessment of the potential loss of functionally linked land relating to the Wye Valley and Forest of Dean Bat SAC.
- 8.2. A detailed summary of the key issues raised, structured around the main policy areas of the RLDP in Plan order, together with the Council's response is set out in the table below. Individual responses to all representations received are provided in the Deposit RLDP Representation Responses, issued by volume, due to the number of representations received. Details of each volume and the policy area covered are set out in Appendix 12.
- 8.3. In addition to the representations included in the Register of Representations, a further five responses were received and considered to be not duly made representations, in the main due to no valid contact details being provided. These have not been considered as part of the Deposit RLDP Representation Responses.
- 8.4. Following the Deposit Plan consultation, a number of minor amendments to the Deposit RLDP are proposed. These amendments relate to matters such as formatting and grammar, factual corrections and minor updates/amendments to policies and supporting text for consistency and/or clarification. All of the amendments are considered to be minor and non-material in nature and, as a result, no focused changes to the RLDP are proposed. These amendments are set out in the Schedule of Minor Changes to the Deposit RLDP and are shown as track changes in the amended version of the Deposit RLDP and Proposals Map.
- 8.5. The RLDP Consultation Report was reported to Place Scrutiny Committee on the 25th September 2025. The minutes of this meeting are attached at Appendix 13. For completeness, the minutes of the Place Scrutiny Committee meeting of the 10th October 2024 in relation to the scrutiny of the consultation draft Deposit RDLP are also attached at Appendix 13.

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RLDP Policy Area	Main Themes/Issues Raised
Issues, Vision and Objectives	The Issues along with the challenges and opportunities were supported in the main. Where objections were made these generally related to site allocations or other policies within the Plan, suggesting these would perpetuate the issues. The key issues, challenges and opportunities have been identified through the RLDP preparation process with a summary of the key economic, environmental, social and cultural issues included within paragraph 3.1.1 of the Plan. Further detail is set out in the RLDP Issues, Vision and Objectives Paper and Appendix 6 of the Deposit RLDP. The Vision was also generally supported. Some site promoters requested the vision be amended to recognise the role market housing plays in addressing affordability issues, stating this was of importance, as an alternative to placing emphasis on affordable housing. It was also requested by a number of representors that the term exemplar be defined. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. The growth strategy communicates the scale of future development. It is recognised that the delivery of market housing is often required to bring forward much needed affordable homes, however the emphasis is appropriately placed on meeting affordable housing need to address this key local issue. Welsh Government support this approach in their representation on the Deposit RLDP, noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales. Regarding the term exemplar, it is recommended that this be included within the glossary of the RLDP to provide clarity. The following definition is suggested; exemplar development relates to development of a high standard. It relates to more than just good design it considers social, economic, environmental and cultural aspects as well as physical appearance. Many comments on the objectives related to minor amendments to the wording. Some reflected comments made to the issues and vision such as defining exemplar and highlighting the important role market housing plays in addressing affordability issues. The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues, including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.

	It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County. Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.
RLDP Sustainable and Resilient Communities Strategy	The response received to the RLDP's growth strategy was primarily objected to on two opposing views. The first noting that the growth level is too high and in excess of the housing target specified by Welsh Government in response to the 2021 Preferred Strategy and is not in conformity with Future Wales. The second view is that the growth level is too low and fails to sufficiently address the RLDP's core issues and objectives and the 2021 Preferred Strategy growth level is more appropriate. There was, however, recognition of the balance the Council has had to factor into the proposed growth level, including Welsh Government's previous concerns regarding conformity with Future Wales and impact on the growth of the South-East Wales National Growth Areas. Similarly, the proposed flexibility allowance of 15% was objected to as being too low, with 20% regularly suggested, and also objected to on the basis that it is too high. Concerns were also raised in terms of the proportion of the housing supply that is met via completions and other allowances, such as existing commitments, windfalls and infills. Views were also expressed that the proposed growth is contrary to the Council's climate and nature emergency. The RLDP's growth strategy seeks to strike a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a 'green' rating and noting that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan 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." In this respect, the level of growth proposed has been deemed in conformity with Future Wales by Welsh Government. The Deposit Plan is, therefore, considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.

In recognition of the balance to be struck in the RLDP, Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also providing additional homes and enabling economic growth.

With regards to the flexibility allowance, the Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure, whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring 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 also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.

The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date, existing commitments that are considered to be deliverable in the Plan period and windfall and infill allowances. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). This has resulted in consequential changes to the indicative distribution of residential growth set out in Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy.

With regards to the Spatial Strategy set out in Strategic Policy S2, there was some support for the proposed hierarchy. However, comments relating to a disproportionate amount of growth to most settlements were received, but primarily in relation to the south of the County. Concerns were also raised at the over reliance on two large strategic sites allocated under policies HA1 – Land to the east of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, and the impact this could have on the delivery of the growth strategy.

The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire.

The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred

	Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy. The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, the Plan incorporates a 15% flexibility allowance to allow for a more robust and resilient approach to site delivery. The flexibility allowance also enables the Plan to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites. Furthermore, the RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved. Further details on the anticipated delivery rates specific to HA1 - Land to the East of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, are set out in response to the site-specific representations. The potential conflict between the list of developments that would be considered as exceptions in the open countryside and those covered by other policies in the RLDP was also highlighted. Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy 2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list.
Managing Settlement Form	The principles of both OC1 New Built Development in the Open Countryside and GW1 Green Wedge Designations generally received support, with the majority of responses welcoming the requirement to manage and control development in open countryside locations in Monmouthshire. In terms of OC1, clarification was required in terms of what development is allowed in the open countryside. The response to this has been to simplify the policy by deleting the references to other policies in RLDP within criterion a). The type of development proposals allowed in open countryside locations is set out in national planning policy.

	With reference to GW1 there have been several comments in relation to clarification for justifications for designations of the Green Wedges set out in the RLDP Proposals Map. These justifications are set out within the Green Wedge Review (2025) which sets out the final conclusion and justifications for the Green Wedge Designations for Policy GW1, based on the methodology and green wedge parcel assessments undertaken by Land Use Consultants (LUC) on behalf of MCC. The Green Wedge Review (2025) concluded that few individual parcels of existing green wedge land did not warrant re-designation. In terms of new designations, these were allocated between the settlement edge of Abergavenny and the statutory designation BBNP, whereby the review took into consideration paragraph 3.68 of PPW, which sets out that green wedges ‘may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area.’ The Green Wedge Review (2025) has concluded that those parcels of land in the area between the settlement of Abergavenny and BBNP that have a high or high-moderate green wedge potential are designated as green wedges. There has been a slight boundary adjustment to parcel AG10 to accommodate the RLDP residential allocation Land at Penlanlas Farm. Please see the Green Wedge Review (2025) for further information.
Placemaking and Design	Strategic Policy S3 relating to Sustainable Placemaking and High-Quality Design was generally well received and supported. Where objections were made, these generally related to specific sites rather than the actual policy wording. Strategic Policy S3 and detailed policies set out within the RLDP provide a positive planning framework for sustainable placemaking and high quality design across the County. The detailed placemaking policies (PM1, PM2 and PM3) were generally supported. As with Policy S3, objections made had no direct relevance to the content of the policies and related to other policies such as the site allocations. Additional detail relating to policy PM1 will be provided within Supplementary Planning Guidance (SPG) associated with Strategic Policy S11 and Policy PM1. Appendix 11 identifies a Placemaking and Design SPG will be prepared to support the RLDP within 12 months of adoption of the Plan. There were limited comments on the detailed heritage policies (HE1, HE2 and HE3) and many of those received did not have direct relevance to the content of the policies. The relevant comments were signposted to supplementary planning guidance relating to Conservation Area Appraisals.
Climate Change	The overarching principles of the RLDP’s policy approach to climate change were generally well received and supported. However, many consider the RLDP allocations to be contrary to the aims of the climate change policy objectives, particularly in relation to flood risk and surface water run-off, air quality and developing on greenfield land. A number of site promoters/agents expressed the view that climate change policy requirements should be applied more flexibly, on a site-by-site basis and having regard to viability issues.

Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.

The incorporation of climate change considerations into development proposals is a key policy objective of the Council. The policy wording is considered to offer a degree of flexibility in how the strategic policy objectives of Policy S4 are met, however, the application of the climate change policy requirements to all development is considered to be appropriate. In relation to viability considerations, all site allocations have been subject to financial viability assessments which have factored in the Council's climate change policy requirements and demonstrate that the sites are viable and deliverable.

The overarching ambitions of Policy NZ1 Net Zero Carbon Homes were generally supported. Some respondents, however, raised concerns regarding its compliance with national planning policy and policy implementation, including the practicalities of implementation, feasibility and viability, as well as the lack of resources to implement the policy. Others considered that these policy standards should also apply to non-residential development.

Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. It is recognised that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1. This policy approach of requiring higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.

With regard to policy implementation, MCC has undertaken considerable consultation with local developers to ensure the proposed development standards are within the capabilities of the local supply chain. Furthermore, it is considered that feasibility and viability have been demonstrated, as set out in the RLDP's evidence base. Supplementary planning guidance (SPG) will be prepared to provide further details on the interpretation and implementation of Policy NZ1, including clarification on the expectations of 'as-built performance surveys'. The Council is considering options to ensure that the appropriate resources are in place on adoption of the Plan to enable the effective implementation of the Policy.

In terms of non-residential development, due to the wide range of typologies and scales of development requiring assessment to build an evidence base for widening the policy to non-residential development, it was not considered practical or feasible to progress this for the current RLDP.

There was general support for a specific sustainable drainage systems policy (CC1), with surface water run-off being a key issue raised as part of the consultation process. However, others felt that it is not needed as it repeats requirements set out in separate legislation.

	The RLDP recognises that sustainable drainage (SuDS) systems are a requirement of separate legislation, however, Policy CC1 is considered necessary to reinforce the Council's position that regardless of size, there will be an expectation that sustainable drainage methods are incorporated into a scheme. The policy will, therefore, be of relevance to schemes lower than the threshold set out in the relevant legislation. The policy also highlights that the distribution of SuDS features across the site should be prioritised. Welsh Government noted support to the approach taken to consider renewable energy generation proposals on a site-by-site basis against the policy criteria set out in Policy CC3 of the RLDP, rather than through the identification of Local Search Areas. General support was received to the criteria-based policy; however, some consider the criteria to be too restrictive. A robust evidence base has informed the RLDP's approach to the appropriate way to consider renewable energy proposals on a site-by-site basis; Welsh Government's support on this issue is therefore welcomed. Policy CC3 seeks to ensure such proposals are balanced against a range of issues including wider environmental, economic, social and community benefits and reflects national planning policy. Objections were raised to the renewable energy allocation made at Raglan Enterprise Park under policy CC2. These primarily relate to the loss of agricultural land and loss of the farming business currently operating on the land. Concerns relating to surface water run-off and biodiversity impacts associated with the allocation were also raised. Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC2 provides an opportunity to contribute to both national and local decarbonisation objectives. The RLDP includes a robust policy framework to consider the concerns raised, including surface water run-off and biodiversity impacts. Due to the prevalence of high-quality agricultural land in the County it is extremely challenging to avoid locating ground mounted solar proposals on agricultural land. While the land allocated under Policy CC2 is Grade 3a Best and Most Versatile Land within the agricultural land classifications, the site performs best in this respect when compared to the other solar related candidate site submissions.
Green Infrastructure, Landscape & Nature Recovery	The overarching principles of the RLDP's policy approach to Green Infrastructure, Landscape and Nature Recovery were generally well received and supported. However, as with the climate change policies, many consider the RLDP allocations to be contrary to the aims of the policy objectives of preserving and enhancing Monmouthshire's natural resources and ecosystems, particularly in relation to developing on greenfield land and that the policy wording is not strong enough to protect our natural resources, as the policies do allow development to take place. The Plan's key issues and objectives address all elements of sustainable development including the provision of homes and economic growth in order to address the county's key issues of ageing demographic and much needed affordable housing provision. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, which includes new growth, and should be read as a whole. The GI, Landscape and Nature Recovery protection policies accord with national planning policy, legislation and case law. Chapter 6 of PPW has recently been strengthened with the 'Net Benefit for Biodiversity' approach which places a

	duty on the Council to seek to maintain and enhance biodiversity by ensuring development does not cause significant loss of habitat or populations of species and must provide improved ecosystem resilience. Overall, the policies are considered appropriate and robust to safeguard Monmouthshire's special environment and biodiversity and reflect up to date evidence and legislation. There was general support for Policy Green Infrastructure (GI1), however, various comments were received in relation to the policy repeating National Policy and that the reference to developers/applicants to provide GI Assessments conflicted with national planning policy which requires LPAs to undertake these assessments. The Policy is not considered to repeat National Policy. It has been written to be locally specific to Monmouthshire and reference is made for proposed development proposals to be informed by MCC's GI Strategy and GI SPG. With regard to GI assessments, for clarification it is proposed to change wording within the Policy and supporting text from 'GI Assessment' to 'GI Statement'. With GI Assessment a reference used for work being undertaken by the Council, such as MCC's GI Strategy ; and GI Statements the terms used when developers/ applicants are required to submit green infrastructure information as part of planning applications . The terms GI Assessments and GI Statements will also be included and defined in Appendix 12 of the RLDP Glossary of terms.
Infrastructure	Most objections received by members of the public related to concerns in relation to existing infrastructure within areas, with some suggesting that development should be directed elsewhere. A number also questioned the funding and delivery of infrastructure projects noting development shouldn't proceed until the supporting infrastructure is in situ. Regarding the location of development, in accordance with Planning Policy Wales (PPW) (2024) housing land should be sited in sustainable locations. The housing and mixed-use allocations identified in the RLDP and any proposals for new housing development outside of the allocations are located in accordance with the Settlement Hierarchy set out in Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the County's primary settlements and most sustainable lower tier settlements. Adequate and efficient infrastructure is recognised in PPW as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering sustainable development and meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan. In addition to Strategic Policy S6, an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP is included within Appendix 8 of the RLDP. With regard to allocated sites, site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the IDP included within Appendix 8 of the RLDP. Site promoters of the allocated residential and mixed-use sites have also completed site specific financial viability assessments (FVA) to support their proposals to demonstrate that their sites are viable based on key policy requirements set out within the site allocation policies, including the provision of 50% affordable homes and net zero carbon homes,

without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.

Organisations including Dŵr Cymru Welsh Water, Network Rail along with some of the housebuilders provided general support for Policy S6. A number of site promoters, nevertheless, questioned the need for a separate policy relating to infrastructure stating this is something that would be assessed on a site-by-site basis and that for allocated sites the information is most relevant in the associated policy.

Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development and provides the overarching framework for all types of development. It is recognised that the allocated site policies and IDP (Appendix 8) set out likely infrastructure requirements for the allocated sites. However, without an overarching policy on infrastructure there would be no reference point for other non-allocated development proposals. It is, therefore, considered necessary to retain Policy S6 within the RLDP.

A few representors didn't think the IDP went far enough suggesting any requirements will be left to determine at the planning application stage.

The IDP sets out the infrastructure requirements, costs etc at this stage of the planning process. Further details will be determined as the site progresses to the planning application stage, as necessary. The estimated costs within the IDP will be updated further where relevant in the RLDP process, when additional information relating to key elements of infrastructure is known. The IDP Background Paper provides more detail on existing infrastructure provision and capacity covering a range of topic areas.

Welsh Government support this approach in their representation on the Deposit RLDP noting the inclusion of the Infrastructure Delivery Plan Background Paper is in line with paragraphs 5.125 – 5.128 of the Development Plans Manual Wales (2020).

With regard to the HA2 Caldicot East North of Portskewett site and the wider Severnside area, questions were raised about health infrastructure. The Aneurin Bevan Health Board also noted local concerns about the Gray Hill Surgery in Caldicot which serves the whole of the Severnside area and has an additional practice in Magor.

The IDP has been informed by, and prepared in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. While health infrastructure isn't listed specifically in the IDP in relation to the site allocation at Caldicot East North of Portskewett, on-going discussions are taking place with the Aneurin Bevan University Health Board (ABUHB) which have progressed further since the Deposit Plan consultation. While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in service improvement across the County as a whole. It is recognised that there is additional need for GP services in the South of the County in particular, and the Council is, therefore, working with ABUHB in finding a solution and delivering a service on the HA2 Caldicot East North of Portskewett site.

High Beech Roundabout and traffic congestion around the Chepstow area was considered by many to be a fundamental issue for the area.

	The operational capacity of the Highbeech roundabout, which is a trunk road roundabout is under the jurisdiction of Welsh Government (WG) Highways, is a key consideration of the site allocation at Land at Mounton Road (Policy HA3). Welsh Government Highway Officers have been consulted on the proposed allocation and have not objected to the inclusion of Mounton Road as a site allocation, subject to any development coming forward being in line with principles of the Wales Transport Strategy (WTS) the Active Travel Guidance Act and other relevant guidance. Welsh Government have committed to delivering WelTAG 1 and 2 studies in collaboration with key partners, including Monmouthshire County Council and Transport for Wales, to identify and assess various options to improve transport movements at this key intersection and Chepstow as a whole. MCC will continue to work with WG and other partner organisations on this matter. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations with also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.
New Housing	Comments received in relation to the policies that allow residential development within the defined settlement boundaries, with these largely focussed on objections to the settlement boundaries themselves. The settlement boundaries defined on the Proposals Map to inform the implementation of the new housing policies have been done so having regard to the growth and spatial strategy set out in the Strategic Policies S1 and the Settlement Hierarchy set out in S2. This has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with Raglan, Usk and Penperlleni identified as Tier 2, Secondary Settlements. Welsh Government in response to the Deposit Plan consultation, concluded that the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this in principle. Similarly, Welsh Government did not object to the Deposit Plan settlement hierarchy and distribution of housing growth. The settlement boundaries appropriately reflect the growth and spatial strategy, and the allocations considered necessary to deliver the strategy. With regard to residential development in minor residential settlements, concern was expressed in relation to the policy wording allowing for minor small scale rounding off or the infilling of a small gap between existing buildings. The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes. Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its

landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.

The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 is considered to reflect the balance referred to in PPW. Infill development is not restricted to gaps between existing residential properties as there could be equally acceptable opportunities between other buildings. Policy H3 seeks to avoid encroachment into the open countryside, restricting development to physical form of the settlement, but recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.

Housing Mix

Some of the site promoters raised concern over the approach to housing mix in the Deposit RLDP, suggesting this should apply to affordable housing only and not market homes.

In accordance with Planning Policy Wales (2024) LPAs should plan for a mix of market and affordable housing types to meet the housing requirement and specifically consider the differing needs of their communities. Additionally, localised issues must also be considered and a local policy approach can be applied where justified to support the viability of communities.

The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. Reflecting this, the housing mix policy (Policy H8) seeks to ensure that new housing developments of 10 or more homes provide an appropriate range and mix of house types, tenure and size to assist in addressing our issues and objectives relating to affordability and demographic challenges. Ensuring a mix of good quality homes of different types and sizes can help to meet the needs of the community and contribute to balanced communities. Low Cost Home Ownership (LCHO) can provide opportunities for first time buyers through the provision of starter homes. However, there is also a need to ensure the provision of additional smaller market units for those that do not meet the criteria for LCHO properties but cannot necessarily afford the typical larger homes on the market in Monmouthshire. The provision of small to medium homes of three bedrooms or fewer will increase the choice of homes for single households, smaller families, young couples/mixed young households as well as older households who would like to downsize, which will help retain these cohorts within Monmouthshire and sustain our communities.

Other site promoters suggested there should be flexibility in the circumstances in relation to the housing mix policy.

Policy H8 is flexible in so far as it does not set limits through the use of percentages or numbers for different sized market homes. Policy H8 requires development proposals to be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included in the RLDP. It would, therefore, be in any site promoters benefit to submit such statements at the pre-application stage to aide discussions with the Council. The Council will give consideration to the preparation of a planning advice note/SPG to provide further clarification on the interpretation/implementation of Policy H8.

	Site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements. The FVA's also set out the mix of market housing and where this has not been appropriate, site promoters have been notified and have updated their FVA's accordingly. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.
Affordable Housing	Welsh Government provided support of the Plan's approach to affordable housing noting there is a severe need to deliver affordable housing, particularly for younger people, and the Council's approach will ensure Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development compatible with Future Wales. There was, however, a mixed response from other representors in relation the Plan's approach to affordable housing. While some provided support for the need for additional affordable housing and applauded the bold approach, others questioned the need for 50% affordable homes and suggested the percentage be dropped to match that of the Adopted LDP. Some raised concern about impact on local infrastructure and lack of jobs within areas. The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework. In conformity with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, that was included within the background evidence reported at the Deposit RLDP stage. The HLVA 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 percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire. Many of the site promoters supported the policy approach but others raised concern about viability impact, noting that Monmouthshire is the first local authority in Wales to set out a requirement for 50% affordable housing, despite evidence set out in the Preliminary High Level Viability Assessment and individual site-specific Financial Viability Assessments. In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan. Many members of the public had general questions relating to how affordable homes would be allocated, questioning the type of affordable homes and raising concern that they would not be allocated to local people.

	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team. The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homesearch website. The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes. Questions were raised in relation to the provision of homes for the ageing Monmouthshire population in relation to both market and affordable homes. Policy S7 intentionally relates solely to affordable housing. However, paragraph 12.10.4 of the RLDP refers to a range of household types, including older person households. It also refers to bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing. In accordance with Planning Policy Wales (2024), paragraph 12.9.1 sets out the type of specialist housing referred to in Policy H7, including age-restricted general market housing, generally aimed at those over 55, as well as sheltered housing and residential care/nursing homes. With regard to affordable housing exception sites, while some supported the flexibility in the policy approach to enabling exception sites in different settlement tiers, other site promoters suggested the site size thresholds were too low. A few objections were made in relation to the Tier 4 settlements where affordable housing exceptions could be made for sites of up to five homes, suggesting this level of housing development would not be acceptable in these locations. National planning policy encourages the use of affordable housing exceptions policies to help meet affordable housing need and support the viability of local communities. Reflecting this, the development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further information regarding this approach. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2.
Gypsy & Travellers	Support was noted by Welsh Government to allocating a site within the RLDP to address the need identified in the Gypsy Traveller Accommodation Assessment. More generally, however, objections were raised in relation to the Gypsy and Traveller allocation at Bradbury Farm, Crick for 7 pitches. Concerns primarily focussed on the suitability of the site due to issues such as noise and highways impact, access to

	services, proximity to the settlement community and the disproportionate number of Gypsy and Traveller sites located in the south of the County. Operational issues such as management, allocation of pitches and rental/council tax payments were also raised as concerns. Planning Policy Wales (PPW) requires local authorities to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need (4.2.36). Site investigation surveys including air quality, transport, ecology, and noise surveys have been undertaken to inform the site identification process. The survey findings were considered at the Cabinet meeting of the 21st August 2024 which approved the inclusion of Land at Bradbury Farm, Crick as an allocation in the Deposit RLDP. Further survey work will be undertaken as necessary at the planning application stage. Further guidance is set out in Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Site. This notes at paragraph 38 that ‘in deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services.’ In this respect, the proposed allocation at Bradbury Farm and its proximity to residential areas is considered to be in accordance with national planning policy guidance and offers opportunities to masterplan the site as part of the wider proposals in the area. Welsh Government has a commitment to ensure a wide choice of accommodation is available and ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers, to have equal access to culturally appropriate accommodation as all other members of the community. With regard to existing Gypsy and Traveller sites in the County, each site is considered against the relevant policy framework and assessed on its own merits. Site management arrangements for the proposed allocation are still under consideration; however, pitch allocation arrangements will operate in a similar fashion to the housing register whereby families register their interest to be allocated a pitch or pitches.
Employment and Economy	The comments received on the Employment and Economy section of the RLDP referred to the job figure as being optimistic and uncertainty as to how it will be achieved. Clarification was also sought in relation to how the employment land figure was arrived at. Concern was raised at the lack of employment land allocated in Abergavenny and the disproportionate amount allocated in Raglan. The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes credible assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised the jobs figure is higher than some past trends, it is within the range of past performance in the County. In addition to industrial based jobs, many jobs will be delivered through foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire’s economy. This reflects the character of the wider economy of South-East Wales and should be supported in line with the ‘whole economy’ approach that is advocated by national planning policy.

	In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the County and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land. National planning policy requires Local Development Plans to make provision for employment land. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given that allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The approach taken is, therefore, considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County. On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the RLDP, with the majority of both directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area). The limited level of employment allocations made in Abergavenny is recognised, this is, however, a reflection of the limited number of candidate site submissions the Council received for the area for employment use. The Council will, however, continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the Cardiff Capital Region (CCR) and other relevant partners. Furthermore, Policy EA2 of the Replacement Local Development Plan (RLDP) protects six existing industrial estates for employment use within Abergavenny, which also contribute to provision in the area. The Plan's policy framework also supports/enables proposals for economic growth in Abergavenny, including proposals in foundational sectors, such as tourism, food and retail, which play an important role in the local economy. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, which reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.
Rural Economy	A key theme to emerge with regard to the rural economy policies is the view that rural enterprise developments conflict with the principles of Policy S2 – Spatial Distribution of Development, as it allows appropriate development adjacent to a settlement boundary, which is defined as open countryside. Objections were also received in relation to the inclusion of a policy to assess poultry units and the environmental impact such developments. Policy S2 - Spatial Distribution of Development - Settlement Hierarchy, notes that outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be where justified by national planning policy. Planning Policy Wales notes rural enterprise developments as a form of development potentially acceptable in the countryside. Policies RE1, which only allows appropriate small scale rural enterprises adjoining the settlement boundary, subject to detailed planning considerations and S2 are therefore considered to be consistent with each other.

	The inclusion of Policy RE5 – Intensive Livestock / Free Range Poultry Units, in the RLDP is consistent with Planning Policy Wales (PPW) and the Welsh Government Chief Planning Officer’s Letter of 12th June 2018, which advises Local Planning Authorities to put in place appropriate policies in Local Development Plans in order to facilitate the sustainable consideration of this type of development. The policy does not allocate/provide more poultry units, but provides the framework to consider such developments, consistent with national policy. It is however, proposed to add an additional criterion to the policy to address cumulative impacts, consistent with national planning policy.
Visitor Economy	The overarching visitor economy principles set out in Strategic Policy S12 were generally supported, where it was recognised that Sustainable Tourism principles help to support Monmouthshire’s economic prosperity. There was concern, however, that the policy does not provide enough detail or published evidence on how Monmouthshire’s visitor economy will be sustained and strengthened. There were also representations that raised concerns that proposed residential allocations in the Plan would discourage tourism away from Monmouthshire. It is acknowledged that the Plan’s approach to sustaining Monmouthshire's visitor economy is consistent with national planning policy (PPW and Future Wales) to plan positively and recognise the importance of tourism to economic prosperity and job creation within Monmouthshire, both in urban and rural locations, and balancing this against the need to protect Monmouthshire’s unique and special environment. The Plan, however, is not the only mechanism to promote the Council’s tourism strategy, with Monmouthshire’s Destination Management Plan 2017-2020 and Monmouthshire’s Economy, Employment and Skills Strategy (EESS) (2023) also providing the supportive means and further detailed strategies to promote and strengthen the tourism industry within Monmouthshire. In reference to Policy T1 ‘New or extended Tourism Accommodation and Facilities in the Open Countryside’, there was general support but concern the impact of development in open countryside/green field locations could negatively impact on the surrounding environment and biodiversity. Comments also questioned whether tourism allocations should have been included within the Plan. The criteria set out in Policy T1 have been developed to reflect the high level support that national planning policy provides in relation to supporting the rural economy. The policy criteria are considered to be appropriate and specific and ensures that development proposals comprehensively reflect and demonstrate the sustainability principles set out in national planning policy. The Policy requires that all development proposals are evidenced with a ‘Sustainable Tourism Need and Impact Assessment’ (STNIA). As noted in Appendix 11 of the RLDP, Sustainable Tourism Supplementary Planning Guidance will be prepared which will provide further detailed guidance on interpretation of the criteria set out in Policy T1. With regard to the approach not to allocate tourism sites within the Plan, it is considered more appropriate to develop a supportive planning policy framework for sustainable development proposals in the county, which allows for consideration of sustainable tourism beyond identified settlement boundaries.
Sustainable Transport	Sustainable Transport policies were in general supported where it was recognised that the premise to promote and prioritise public transport and active travel (walking, wheeling cycling) improvements and design was positive and proactive. There were various concerns raised, however, that with Monmouthshire being largely a rural county existing public transport services and facilities are poor and not adequate in providing a level of public transport that equates into a modal shift away from the private vehicle, and the policies are therefore unrealistic in a

Monmouthshire context. There were various comments in relation to existing highway infrastructure not being adequate for the proposed new strategic developments set out in the Plan, with concerns raised in relation to traffic congestion that is currently being experienced, particularly in the south of the county, in relation to Land to the East of Caldicot North of Portskewett (Policy HA2) and Land at Mounton Road, Chepstow (Policy HA3).

Welsh Government also commented that the Sustainable Transport policies should address reducing parking levels in line with the Wales Transport Strategy.

Monmouthshire's Sustainable Transport policies are underpinned by the Wales Transport Strategy (WTS), Future Wales 2040 and Planning Policy Wales (PPW), where there is a collective ambition for development to be located and designed in accordance with the Sustainable Transport Hierarchy. This WTS places an emphasis on development to be located and designed in way which ensures the reduction in the need to travel and a shift away from the private car for travel. The RLDP sustainable transport policies, therefore, reflect this national strategy, with the promotion of targeted new options, such as designing development to reduce the need to travel, improving active travel networks to maximise active travel connections and networks and providing electric vehicle charging, with digital infrastructure being part of development design.

The sustainable transport policies do, however, recognise that in rural areas without bus provision, the use of private cars may remain the only practical option. Policy ST1 clarifies that if a rural location is justified for a proposed development, a proportionate approach will be applied to such proposals and their ability to accord with national planning policy, including the Sustainable Transport Hierarchy. A small level of growth is allocated in the County's most sustainable rural settlements to address Objective 13 'Rural Communities' of the Plan and ensure Monmouthshire's rural communities and economy are sustained and supported.

The Plan directs most growth, including strategic site allocations, to Monmouthshire's most sustainable Primary Settlements, where there is access to, and provision of existing public transport facilities and active travel networks, and opportunities to connect and link with local and regional transport aspirations to support the modal shift away from the private vehicle. Monmouthshire's transport aspirations are set out in the Local Transport Strategy (LTS), which contains proposals to improve the County's train stations in Abergavenny, Chepstow and Severn Tunnel Junction, and support the new Magor Walkway Station in the Severnside area, as well as proposals to improve bus station infrastructure in Abergavenny, Chepstow, Severnside and Monmouth. The LTS also includes support for improvements to the active travel network within the County and support road improvement schemes, which include a link road from the B4245/M48 to Severn Tunnel Junction Train Station and improvements to Highbeech roundabout, Chepstow. The aforementioned road improvements, however, come under the operational jurisdiction of the Welsh Government, and MCC is working with Welsh Government and other regulatory bodies, such as Transport for Wales, to bring these transport schemes forward. Policy ST5 safeguards these transport schemes from any proposed development that may prejudice them coming forward.

In terms of the sustainable transport policies reducing parking levels, it is considered that policies S13 and ST1 allows for a flexible approach for considering parking requirements associated with new developments. Policy ST1 sets out that in town centre locations, car-free

	development will be supported where practicable. It is anticipated that Supplementary Planning Guidance for the Council's Parking Standards 2013 will be reviewed and updated to ensure alignment with the WTS, Future Wales and PPW parking guidance.
Retail & Commercial Centres	The Retail and Commercial Centre policies were generally well received. Some concern was raised in relation to pressure from out-of-town developments and the existing centres, including changes made to the street scene. The need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands is a key objective of the RLDP and is reflected in the Plan's policy framework. Strategic Policy S14 provides the overarching framework for new or enhanced retail, commercial and social developments. S14 includes a hierarchy ranging from Town Centres to Neighbourhood centres. In addition to retail policies, Strategic Policy S15 provides support for new local shops as community facilities outside of the identified centres. Any such proposals must adhere with policies S15 and RC4. In relation to the existing centres, town centre regeneration schemes will be supported by the retail policy framework within the RLDP where planning permission is required. However, any proposals relating to highways, which includes pavements, sit outside the scope of the RLDP process.
Community Infrastructure	Community Infrastructure policies were well received, with support in relation to protecting and enhancing community facilities, open spaces, allotments and growing spaces throughout the County. Concern was raised, however, that Monmouthshire's settlements lack community facilities, such as dentist and doctor surgeries and there is a lack of that open space, which is being exacerbated by the loss of open spaces to new housing developments, set out in the Plan. The RLDP has a duty to address all elements of sustainable development and community well-being, including the provision of homes and economic growth, and address Monmouthshire's core issues of affordable housing provision and rebalancing our demography and economic prosperity. In terms of building on Monmouthshire's green open spaces, it is recognised that previously developed land (brownfield) opportunities in Monmouthshire are limited, and greenfield opportunities have, therefore, been considered through the site selection process to meet our key housing and employment requirements. The greenfield site allocations are generally in private ownership and, as such are not publicly accessible open space, although in some cases there may be PROW across the land. The RLDP provides the policy framework to ensure public open space is provided as part of new development proposals, including the site allocations. This will increase access to open space, growing spaces and recreation for our communities. As part of a review of building an evidence base of open spaces throughout the County an open space audit (updated 2025) has been undertaken, which helps inform Policies CI2 and CI3, as well as an Area of Amenity Importance (AAI) review, which informs policy CI4. In reference to lack of doctor and dentist facilities, the mechanisms for improved health infrastructure sit outside of the planning process, however, the Council is fully engaged with the health board (ABUHB) to deliver health care service improvements across the County. In relation to Policy CI2 Provision of Formal and Informal Open Space and Allotments/ Community Growing Areas, which sets out formal and informal open space benchmark standards for settlements in Monmouthshire, based on the Fields in Trust (FIT) standard, it was commented that the FIT standard has been updated since the publication of the Deposit Plan and Policy CI2 should be amended accordingly. Others commented

	that Policy CI3 which safeguards recreational facilities and open space in relation to the standards set out in CI2, should be stricter and remove the flexibility provided in criterion (b), which allows a loss of facilities/open spaces if it can be justified that there is an excess in the locality. It is acknowledged that the FIT standard has been updated in November 2024, since the Deposit Plan was written, and the policy requires updating, along with the Open Space Study. The policy and Open Space Study will be updated to reflect the updated FIT Standards The level of flexibility in Policy CI3 is considered reasonable and appropriate, allowing proposals to be considered for other uses if there is an excess of open space in a given area. There was some support for Policy CI4 Areas of Amenity Importance (AAI) noting the policy is clear in its approach. A number of representations received related to specific sites that had either been deleted as AAI or included as new areas of AAI. One of the sites deleted is located in Raglan and has planning permission for 21 homes, the other related to land outside the Magor development boundary. The site in Raglan was privately owned with no public access. The development of the site for housing will enable public access to the open space provided within the site which will benefit the local community. The open space provided throughout and to the north of the site will be considered for formal designation as an AAI in future Plans. In Magor, the AAI designation in the Adopted LDP to the north of Magor and Undy had a boundary that aligned broadly with the M4 safeguarding route. As there is no longer a need to protect the M4 safeguarding route, the boundary of the AAI was considered to be arbitrary and did not follow a particular defined boundary. A large proportion of this AAI was located outside of the development boundary in an area of open countryside. While it may have some informal use, it does not have a formal recreation use and due to its location does not meet the criteria to be designated as an Area of Amenity Importance as per the methodology set out in the AAI Review. In addition to this, the majority of the land is privately owned and is not accessible to the public. Paragraph 1.6 of the AAI Review refers to privately owned spaces, noting that such spaces are not accessible to the public and have been excluded from AAI as they do not fulfil the criteria for designation as AAI. Amendments have, therefore, been made to the boundary to exclude the northernmost section that is located outside the development boundary.
Minerals	Welsh Government noted support for the approach taken towards preparing the Former Gwent Statement of Sub-Regional Collaboration: Position Statement. However, the Minerals Product Association expressed disappointment that the requirement to prepare a Statement of Sub-Regional Collaboration has not been fully met and consider that the Former Gwent Sub-Region not being in a position to confirm how the regional minerals apportionment figures will be met to be unacceptable. The Mineral Planning Authorities (MPAs) that make up the Former Gwent Sub-Region have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC), however, it has not been possible at this stage to confirm how the regional apportionment figures will be met due to specific ongoing circumstances that are referenced in the Position Statement, such as the outcome of planning applications and candidate site submissions in the sub-region. These influence the sub-region's ability to establish what the shortfall is, making it premature to approach other authorities. The preparation of a Position Statement, to be monitored and updated as circumstances change, was therefore seen as a pragmatic way forward. This approach has been supported by Welsh Government in its representations on the

	Deposit RLDP. The SSRC: Position Statement has, however, been updated to reflect updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix.
Waste	The overarching sustainable waste management principles set out in Strategic Policy S17 were generally well received and supported, however, the potential environmental impacts of such developments were raised as a concern. Recognition that waste management is not limited to commercial and householder waste was raised, noting that agricultural waste is key in a Monmouthshire context. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow and anaerobic digestion in rural locations. Objections were raised to a number of the employment allocations listed in policy W3 that have been identified as having potential for the location of in-building waste management facilities. Concerns focussed on requesting details of the type of waste and disposal process involved and the impacts these would have on the local environment. Planning Policy Wales (PPW) requires sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP along with any relevant environmental permitting requirements.
ISA	Welsh Government recommended the LPA seek their own legal advice to ensure all of the procedural requirements have been met, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). They also stated a requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality if deemed appropriate. The LPA is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal.

	Other objections in the main criticised the assessment of alternative sites and consideration of options, suggesting that alternative ‘scores’ should have been provided. The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring (‘quantitative analysis’) how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets.
HRA	Welsh Government noted the need to demonstrate that the RLDP aligns with Natural Resources Wales’s (NRW) updated guidance relating to phosphates and nutrient neutrality. It also recommended that the Local Planning Authority (LPA) seek its own legal advice to ensure all legal procedural requirements have been met including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Local Planning Authority is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal. With specific reference to the HRA, this has been undertaken by AECOM Consultants and follows the relevant regulations appropriate to the stage of Plan being reviewed. Natural Resources Wales (NRW) raised concerns regarding the robustness of the assessment of the potential loss of functionally linked land relating to the Wye Valley and Forest of Dean Bat SAC and whether it has been satisfactorily demonstrated that proposed allocations would not have an adverse effect on the conservation objectives of the Bat SAC. An Addendum to the Habitats Regulations Assessment has been prepared by AECOM which assesses the impacts of the Deposit RLDP on the Wye Valley and Forest of Dean Bat Sites SAC. This concludes that with regard to the conservation objectives specific to the Wye Valley and Forest of Dean Bat Sites SAC, sufficient foraging habitat is maintained with minimal loss in suitable foraging habitat within the Core Sustainance Zone of designated roosts within the SAC as a result of the proposed site allocations in the Monmouth area. In addition, the RLDP contains policies both on a general and site-specific level, to control the impact on habitats bordering relevant proposals, including policy requirements to minimise the impacts of light spill and linear features that could serve as bat flight lines are protected. The HRA Addendum is therefore considered to have addressed the issues raised.

RLDP Site Allocation	Main Themes/Issues Raised
HA1 – Land to the East of Abergavenny	A significant number of representations were received in relation to the mixed-use allocation Policy HA1 – Land East of Abergavenny. Whilst the majority object to the proposed allocation, many support it as the focus for growth in Abergavenny. Key issues raised relate to the site not forming a logical extension to the settlement and there being no justification for its allocation and the resultant loss of greenfield land. The need for comprehensive masterplanning is recognised by both supporters and objectors. General impact on the landscape setting as well as more specifically on the Little Skirrid and Coldbrook Park were noted. Ecological impacts are also noted as an area of objection. A key issue raised is the connectivity of the site with the wider Abergavenny area and the incorporation and implementation of crossings over the A465 and railway. The general impact of the proposal on Abergavenny’s highway network was also raised, along with impact on infrastructure in the locality. The low level of employment within the proposal was a concern, with suggestions to increase it. The delivery of the site and its ability to deliver 500 homes in the Plan period was raised as a significant concern. The viability of the proposal given the level of infrastructure required, along with ownership concerns relating to the western section of the site were also raised as potential issues affecting the site’s delivery. <u>Settlement Form</u> The proposed growth level and spatial distribution set out in the RLDP, represents a sustainable approach to addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales. Spatially, the growth is considered to be well distributed throughout the County and reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth apportioned to Abergavenny is considered to be consistent with the findings of the SSA, which confirms the dominant role of Abergavenny in the County reflecting the range of services and facilities and sustainable transport options, including a train station, available to Abergavenny. Future growth within Abergavenny is constrained by a number of factors, including areas immediately north and west of the town adjoining the Bannau Brycheiniog National Park, some of which are proposed to be designated as green wedges, and the floodplain of the River Usk constrains development to the south of the town and in parts of Llanfoist. Having regard to these constraints and the site selection process, the allocation made under policy HA1 – Land to the East of Abergavenny, offers the opportunity to create a sustainable, affordable housing-led, mixed-use community that helps meet the objectives of the RLDP. In responding to the Deposit Plan, Welsh Government noted <i>the allocation signals the future direction of sustainable growth for the town during the plan period and beyond. The site is located close to the</i>

town centre and provides good public transport connectivity to Cardiff, Bristol and Hereford through the adjacent railway station. The schematic diagram demonstrates an appropriate mix of uses and provides an opportunity to promote transit orientated development in line with the policy objectives of Future Wales and Planning Policy Wales. In this respect, the allocation is considered to be appropriate and in accordance with national planning policy.

Masterplanning

The masterplan accompanying HA1 – Land to the East of Abergavenny, is indicative with more detailed masterplanning to be undertaken as part of the ongoing progression of the proposed allocation. In addition to the indicative Deposit masterplan, there is a robust evidence base supporting the proposed allocation including a Placemaking Booklet, Density Framework, Land Use Framework and Movement Framework Plan. Significant masterplanning works have been undertaken to date by the site promoters having regard to the input from MCC Officers and the Design Commission for Wales to establish key placemaking principles and policy requirements as set out in policy HA1. The RLDP makes clear that the proposed allocation represents the longer-term intention for growth beyond the Plan period. However, the extent of future growth will be determined by the evidence base relating to a future plan period. It is, therefore, not considered appropriate at this stage to allocate/masterplan a larger area.

Landscape Impact

From a landscape and GI perspective, Policy HA1 criterion (f) states that ‘Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny’. As indicated in the indicative masterplan contained within the Deposit Plan for proposed site allocation HA1, land on the eastern boundary of the site is proposed to be retained as a nature area between the built development and the foot slopes of the Little Skirrid. In this respect, the high level masterplanning for the site allocation has responded to its landscape setting and further consideration of the potential impact on the Skirrid and the Little Skirrid will be undertaken through an Environmental Statement as part of the planning application process.

In terms of the potential impact on the BBNP, significant views will need to be assessed as part of the Landscape Visual Impact Assessment and Environmental Statement in terms of cumulative impact on landscape character and setting as part of the planning application process. This will be within the context of RLDP policies LC1 – Landscape Character, LC3 – Bannau Brycheiniog National Park (BBNP) and LC5 – Dark Skies and Lighting.

Strategic Policy S8 – Site Allocation Placemaking Principles and Policy HA1 – Land to the East of Abergavenny, along with policies S5 – Green Infrastructure, Landscape and Nature Recovery and the Development Management policies under this strategic policy within the RLDP will enable the Council to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

With regard to the impact on Coldbrook House Registered Historic Park and Garden, Cadw has noted that existing vegetation already provides some screening in relation to the view from the historic asset and careful design and additional planting should provide sufficient

screening to reduce any effect of development to an acceptable level. The RLDP policy framework and its key policy focus of requiring the significant use of green infrastructure to integrate development into the wider landscape, along with national planning policy and the relevant historic environment legislation, will ensure the setting of the registered park and garden is considered at the detailed planning stage.

Ecological Impact

With regards to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements, as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. MCC Ecology note that appropriate mitigation and compensation are required which will be agreed at the detailed planning stage.

In terms of potential impact on the River Usk nutrient sensitive catchment, the Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW confirmed that it is committed to delivering upgrades to the Llanfoist Wastewater Treatment Works (WwTW) to include phosphate stripping capability. It has advised that capacity will be available at the WwTW to accommodate foul flows from the proposed allocated upon completion of the upgrade scheme at the Llanfoist WwTW.

Highway Impact

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. A Transport Assessment has been undertaken in support of the site allocation, with further analysis to be provided at the planning application stage. Furthermore, Policy HA1 requires the proposal to be supported by a range of transport improvements including provision of pedestrian and cycle active travel linkages to key access points, incorporation of the existing Public Rights of Way and improvements to the public transport infrastructure associated with the site.

The proposal includes a proposed access point onto the A465, along with a secondary access point. Criterion m) refers to the secondary access being on to Garth Road. It is proposed to amend this to refer to 'the provision of a secondary access'.

A465/Railway Crossings

The integration of the strategic site with the wider Abergavenny area and associated facilities is a key principle of the proposal, along with the identification of connections over the railway line and A465. The site's proximity to Abergavenny train station provides the opportunity to create a sustainable development that promotes sustainable transport options in accordance with national planning policy. The proposal provides the opportunity to create a public transport interchange for both rail and bus and the provision of a park and ride facility. To facilitate this, Policy HA1 sets policy requirements including the repurposing and redesign of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line. Other measures include the incorporation and enhancement of Public Rights of Way footpaths and a network of pedestrian and cycle routes to increase permeability and connectivity.

Work has been conducted on the potential options to access the train station and to provide active travel routes to the wider Abergavenny area and these will be further considered as part of the planning application.

With regards to the potential relocation of the A465, this does not form part of the current proposal and would not be consistent with Welsh Government's current policy position on road building.

Amenity/Air Quality/Light Pollution Impacts

There are no Air Quality Management Areas designated within the Abergavenny area, although the impact on the Merthyr Road Bridge/Waitrose roundabout is being monitored. Air quality concerns are addressed in Policy HA1q) – which requires incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution. Specific concerns relating to light pollution impacting on the Bannau Brycheiniog National Park (BBNP) are addressed in Policy LC5 – Dark Skies and Lighting.

Drainage/Flood Risk

The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning policy on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. The inclusion of necessary surface water drainage systems will be a key element of the ongoing masterplanning for the site.

Development on Greenfield and Agricultural Land

Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development, including the provision of homes and economic growth, and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and jobs potential.

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

Employment

The employment provision made within the strategic allocation under policies HA1 and EA1k – Land to the East of Abergavenny, is an integral element of the proposed mixed-use allocation, located at the western end of the site, opposite the train station, and as such has potential to serve both the development site and the wider Abergavenny area. The scale of provision reflects a balance between the creation of a sustainable community through the incorporation of a mixture of uses and an acknowledgement of the level of B1 Use Class provision that is needed to contribute to the overall employment land requirement over the Plan period.

The Town and Country Planning (Use Classes) Order 1987 (as amended) classifies B1 Business Use Class as being offices, research and development of products and processes, light industry appropriate in a residential area. The employment allocations have been informed by the Employment Land Review (Nov 2022), which recognises the important contribution B1 uses make to the local economy but concludes that B2 (general industrial) and B8 (storage and distribution) uses make up the majority of the employment requirement, which would not be appropriate in the context of the proposed residential-led, mixed-use allocation. In this respect, additional land for B1 use classes is not considered to be required as part of this site.

Infrastructure Requirements

With regards to the provision of infrastructure, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.

With specific reference to education provision in the locality, MCC Education has indicated that there is currently capacity in both primary and secondary schools in the area to accommodate the proposed allocation. This will be reviewed at the planning application stage.

The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW has advised that a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades.

Deliverability

Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.

In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.

In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.

Viability

A site-specific financial viability assessment (FVA) has been undertaken as supporting evidence to the proposal to ensure that the site is viable based on 50% affordable housing requirements along with other key policy requirements. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.

Western Parcel of Land

Extensive dialogue has taken place between the Council and the respective parties involved in bringing the proposed site allocation forward and these will be ongoing as the RLDP progresses to Examination and to the planning application stage. The indicative masterplan contained within the RLDP is considered to be deliverable having regard to land ownerships and the Council will continue to work with all relevant parties to secure the delivery of the site. The Council fully appreciates that Coldbrook Estates are seeking the inclusion of a larger area of land, promoted as part of the candidate site process in relation to candidate site submission CS0293, the outcome of which will be concluded as part of the Examination process.

	The RLDP recognises the placemaking benefits the western parcel of land contributes to the overall masterplanning of the site. The land provides an opportunity to contribute to placemaking and sustainable transport objectives through the incorporation of a potential park and ride facility and mixed-use neighbourhood centre, linking to Abergavenny Railway Station and the wider Abergavenny area. Given the placemaking benefits associated with this section of the allocation, the Council will explore all options available to deliver this land as part of the wider scheme.
HA2 – Land to the East of Caldicot/North of Portskewett	A substantial number of representations were received concerning the affordable housing-led mixed-use allocation Policy HA2 - Land to the East of Caldicot/North of Portskewett. There was some support for the site, however, the majority of respondents object to the proposed allocation. Many commented on the size of the site and number of homes proposed, suggesting the Severnside area had reached capacity and also that the site could not be delivered within the timescales of the Plan period. The location of the site in relation to designated areas of ecological importance was raised, along with impact on protected species, habitats and the loss of agricultural land. The site's proximity to Caldicot Castle was of concern to many residents, as well as its location generally on the edge of Caldicot and Portskewett suggesting it would have an impact on the landscape. Some representors disputed whether the site related to Caldicot or Portskewett along with the name of the site. One of the key issues raised related to infrastructure requirements and the impact of the proposed site allocation on existing services that are already stretched, including education and healthcare. The impact of the site on the local road network and the Highbeech roundabout was raised by many, along with reference to limited public transport in the area. Others commented on the provision of footpaths and active travel routes, particularly in relation to links to the Town Centre. The site's potential impact on flooding, water and sewerage in the local area was of concern to many respondents. <u>Site Selection</u> The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal (SSA) and is set out in Strategic Policy S2. The sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable affordable housing-led developments that provide well-connected and balanced communities. The SSA confirms the dominant role of the primary settlement of Caldicot including Severnside reflecting the range of services, facilities and sustainable transport available. The settlements in the south of the County, in particular, exhibit a strong geographical and functional relationship and collectively

form the Severnside area centred around the primary settlement of Caldicot and includes Portskewett along with Magor Undy, Rogiet, Caerwent, Sudbrook and Crick.

In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. The proposed site allocation at Land East of Caldicot North of Portskewett will form a new neighbourhood of Caldicot with links to Portskewett to the south/southeast. The inclusion of a primary school at the site will bring benefits for the wider community, serving both the new development and the nearby homes in both Caldicot and Portskewett. The inclusion of a mixed-use neighbourhood centre offers the opportunity to include other community uses such as a health centre, as well as small scale local convenience shop. The site will also include land for employment opportunities. The site includes strategic open space throughout that will be available for use by both the existing and future community, with links to nearby active travel routes. Importantly, the site will deliver the Plan's key policy objectives of 50% affordable housing and net zero carbon homes.

While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being greenfield Council-owned land. The inclusion of sites in public ownership is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets. Through the site search sequence process Land to the East of Caldicot/North of Portskewett was considered the preferred option for development as a sustainably located, well-connected edge of settlement site to meet housing need in the area and enable the delivery of balanced communities. For further information please see the relevant Candidate Site Assessment Proformas.

Site Delivery

The housing trajectory is the key mechanism to demonstrate how sites will be delivered in the identified timescales, throughout the Plan period, to meet the RLDP housing requirement. At the housing stakeholder meeting it was suggested that the lead in times for first completions were overly ambitious due to the average length of time between submission of a planning application and first completions on the site. A fundamental part of the requirement to frontload the RLDP process is to ensure that the Plan as a whole is deliverable, including site allocations. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020), the site allocation is supported by a comprehensive suite of technical work to assist in frontloading the process and inform delivery of the site allocation within the Plan. There has been a continuing dialogue with the site promoters along with internal and external consultees during the preparation of the RLDP, which will significantly reduce the time taken to determine planning applications on the site.

Following ongoing dialogue with the site promoters it is proposed to update timescales with the first completions moved to 2028/29, however, they reaffirm that the 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.

It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.

Given the likelihood of multiple outlets across the site the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.

Ecological Impact

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA2 includes a number of criteria in relation to nature recovery including the Severn Estuary European Marine Site, the Nedern Brook Site of Special Scientific Interest and the Mount Ballan SINC. Criterion k) notes no built development is to take place in the SSSI.

Criterion j) relates to opportunities for grassland and hedgerow restoration, wetland creation and woodland connectivity to support protected species on the site. Criterion k) relates to the enhancement of grassland areas and enhanced native planting around ponds and wetland areas to support protected species.

A number of ecological surveys have been produced to date to support the allocation. Further ecological surveys will be undertaken and submitted at the detailed planning application stage.

The RLDP includes a specific policy (LC5) relating to dark skies and lighting that must be considered as part of a detailed planning application.

Criterion h) of Policy HA2 states that green space design must consider any emerging guidance for Suitable Alternative Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary. This will include consideration of the SSSI as Functionally Linked Land for overwintering birds. A Severn Estuary Recreation Strategy has been prepared which also considers SANG provision for this site.

Agricultural Land

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In their representation on the Deposit RLDP, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations

involving BMV and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. When considering the search sequence recommended in national planning policy, it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain.

Impact on Heritage

The impact of the development on the surrounding historic assets has been considered during the candidate site assessment process by colleagues in the MCC Heritage team. The proposed development is sufficiently far away from the immediate setting of the castle as not to have an adverse impact on its setting. The masterplan retains areas of parkland around the castle to ensure the wider setting of the asset is maintained and the new development is integrated within its surroundings. Further consideration of the Castle and its setting have been provided from Cadw. Cadw have reviewed the heritage assessment for the site and note development of the site is possible without causing a significant impact on the settings of designated historic assets.

Criterion g) of Policy HA2 provides reference to the adjacent Grade II Listed Building, Conservation Area, Country Park and views to the nearby Scheduled Ancient Monument. This notes that development should consider and respond positively to these heritage assets and that no built development will take place in these sensitive areas.

Part of the site is located in the Archaeologically Sensitive Area of the Gwent Levels, this relates to the area to the west of the former MOD railway line where no built development is proposed. Desk-based assessment and geophysical survey is required, prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

Landscape Impact

Strategic Policy S8 and Policy HA2, along with Policy S5 and supporting DM policies, will appropriately enable the Authority to address concerns of impact on landscape character and visual amenity.

Landscape and Visual Impact Reports have been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage. Separate requirements and tools under other legislation such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

Policy HA2 includes criterion e) which relates to development of the site considering existing topography, assets, features and contours of the site and also notes this should include measures to integrate development appropriately while reducing visual impact. Criterion e) of Policy HA2 also notes less dense development should be provided on the edge of the site.

The RLDP Strategy has regard to Policy 34 and the indicative Green Belt boundary set out in Future Wales 2040. The site is located outside of this indicative area.

Site Name

It is recognised that the site lies across ward boundaries and is linked to both Caldicot and Portskewett, accordingly the site is named within the RLDP as Policy HA2 Land to the east of Caldicot/North of Portskewett.

Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. As a consequence, any site-specific infrastructure requirements for the proposed site allocations are set out within the individual site allocation policies and are also reflected in an Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advise that there is currently capacity in secondary schools within the locality, however, there is a lack of capacity in local primary schools. A new primary school is consequently proposed as part of the HA2 allocation which will serve both the existing and future residents in the area.

While health infrastructure isn't listed specifically for this site in the IDP, on-going discussions are taking place with Aneurin Bevan University Health Board (ABUHB). While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in delivering service improvements across the County as a whole. It is recognised that there is additional need in the South of the County in particular, and the Council is, therefore, working with ABUHB in identifying potential solutions and delivering a service on the Caldicot East North of Portskewett site.

The Council is implementing an ambitious town centre regeneration project for Caldicot Town Centre which will improve its attractiveness to businesses and the community.

Highways/Accessibility Considerations

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.

Regarding the road network, MCC Highways agree with the Transport Assessment produced to date but note that further information will be required at the detailed planning application stage. A Travel Plan has also been produced for the site and will be updated at the planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle.

With regard to Highbeech roundabout, Welsh Government have committed to delivering WelTAG 1 and 2 studies in collaboration with key partners, including Monmouthshire County Council and Transport for Wales, to identify and assess various options to improve transport

movements at this key intersection and Chepstow as a whole. MCC will continue to work with WG and other partner organisations on this matter.

In addition to this, criterion o) of Policy HA2 relates to the provision of off-site highway improvements as necessary, having regard to the requirements arising from the Transport Assessment and includes specific reference to footways required as part of the site, the revision of speed limits along Crick Road to 20mph and provision of a public transport link.

The site is served by bus route 73 (Newport-Caerwent-Crick-Chepstow). Criterion o) of Policy HA2 refers to the provision of a public transport link along Crick Road and throughout the site, details of which will be determined at the planning application stage. The IDP includes public transport financial contributions towards improved public transport and bus frequency.

Active Travel Links and Footpaths

Policy HA2 includes criterion n) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the new development area. This includes a key connection in the form of an active travel route to Caldicot Town Centre, along with a connection to the former MOD railway, cycle and walking route.

Flood Risk and Surface Water Run-Off Considerations

Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies the southern part of the site as being located within Flood Zone 2 and 3, however, this does not form part of the built development area of the site. Criterion p) of Policy HA2 reflects this noting that no built development will be permitted within the part of the site located in floodplain. Accordingly, Flood Consequences Assessments have been prepared for the site, and further detail will be considered as part of the planning application stage.

With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

Dŵr Cymru Welsh Water

Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and advised that there are no issues with accommodating the foul flows from the site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system and to inform the extent of any necessary water infrastructure and sewerage upgrades to ensure there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. This type of information would not be required until the planning application stage.

HA3 – Land at Mounon Road, Chepstow

Land at Mounon Road, Chepstow (Policy HA3), generated a large consultation response to the proposal with over 300 respondents commenting on the proposed allocation. Although there was some support for the proposed allocation, with Chepstow Town Council commenting that members are positive regarding the progressive development of promoting the site, concerns were expressed regarding the infrastructure and there is a reluctance to support the development until transport congestion issues on Highbeech roundabout are fully addressed.

The majority of responses mirrored this concern that the existing highway infrastructure is not adequate to cope with further development in the Chepstow locality, in particular numerous representations related to traffic congestion at Highbeech roundabout.

Other concerns repeatedly raised in the representations included the loss of Best Most Versatile (BMV) agricultural land, loss of green wedge land, visual impact of the proposal upon the gateway to the Wye Valley National Landscape Area of Outstanding Natural Beauty (AONB) and surrounding heritage, detrimental impact to biodiversity, and exacerbation of air quality issues in the area, particularly as there is an Air Quality Management Area (AQMA) in close proximity to the site.

In relation to the proposal to include a hotel/ care home at the site, some responses did consider this as a positive, but others felt that a hotel was unnecessary due to existing hotels in the locality of Chepstow and nearby Tintern, which serves the Wye Valley National Landscape (AONB).

Some representations considered an alternative candidate site (CS0098) Land at Bayfield to be the preferable site for development in the Chepstow locality.

Loss of BMV agricultural Land/Site Search Sequence

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

Despite a high proportion of BMV within the site, the site has been allocated as the preferred site in the Chepstow locality as the site performs well in terms of placemaking and accessibility criteria. Moreover, the site is being promoted as a mixed use development which has economic benefits to the County as a whole as well as employment opportunities to the residents of Chepstow reducing the need to travel/commute for work. The edge of settlement location near the gateway location/key travel routes into Chepstow's town centre also provides the opportunity to promote accessibility and connectivity into Chepstow's town centre.

Contrary to the Green Wedge Designation

As part of the RLDP process, green wedge designations in the current adopted LDP (2011- 2021) have been reviewed. As part of this, the assessment of the parcel of land (CPM10) that contains the proposed Mounon Road allocation concluded that 'the tree belt along St

Lawrence Lane forms a strong boundary to the land south west, *and the A48 forms a boundary to the south east limiting the impact that development here would have on the adjacent land and on the remaining gap between Chepstow and Pwllmeyric. The parcel makes a moderate contribution to preventing settlement coalescence, managing urban form, safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a 'moderate buffer role.'* Therefore, the potential for green wedge designation is moderate.

A Green Wedge Review (2025) has also been undertaken to interpret and conclude the green wedge assessments undertaken by LUC. In line with the assessment evidence, the parcels of land have been considered for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12). It is concluded there is not a significant reason in context of the green wedge purposes that land parcel CPM10 should be retained as a green wedge designation. Is it, therefore, proposed to remove the green wedge designation. The removal of this parcel of land is also considered to align with national policy, whereby PPW notes that green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Ensuring 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 pressure in the area and the need to minimise demand to travel. For further information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025).

Highbeech Roundabout and Transport Infrastructure Concerns in Chepstow

In terms of concerns in relation to the capacity of Highbeech roundabout, the operational capacity of the Highbeech roundabout, which is under the jurisdiction of Welsh Government (WG) Highways, is a key consideration to the development proposal Land at Mounton Road. Welsh Government Highway Officers have been consulted on the proposed allocation and have not objected to the inclusion of the Mounton Road as a site allocation, subject to any development coming forward being in line with principles of the Wales Transport Strategy (WTS), the Active Travel Guidance Act and other relevant guidance. The WTS prioritises measures that maximise mode shift from the private vehicle off the highway network to measures that promote sustainable travel, which includes prioritising active travel (walking, wheeling, cycling) and public transport use. This is also reflected in national planning policy (PPW and Future Wales), as well as RLDP policies S13 Sustainable Transport and ST1 Sustainable Transport Proposals.

As well as consulting with WG Highway Officers, MCC commissioned a Strategic Transport Assessment (STA) which undertook modelling using the South East Wales Transport Model (SEWTM) to assess the potential impact of the proposed RLDP's housing growth on the highway network compared to the existing baseline movements. In relation to Chepstow, this indicated a 2-4% increase in localised traffic at Highbeech roundabout junction. It should be noted, however, that the modelling output is based on existing public transport and active travel provision and the analysis does not take into account the national policy aspirations to improve the public and active travel provisions and networks in Chepstow.

In reference to Chepstow and national aspirations to improve sustainable transport travel in the town, the Welsh Government are currently undertaking a funded strategic assessment, known as WelTAGs, which appraise different transport solutions based on deliverability, well-being and affordability considerations. Subsequently, there is a wider strategic approach to travel and traffic improvements within the settlement of Chepstow, which the Highbeech roundabout junction is part of, and goes beyond measures to

improve the roundabout, strategically assessing transport improvements to the town as a whole. Nevertheless, the allocation of Land at Mounon Road is in a unique position to identify and safeguard land in the southeast part of the site for potential improvements to the roundabout, if required. This is set out on the Indicative Masterplan and within Policy HA3 criterion (m).

Furthermore, as well as a national approach to drive transport improvements in Chepstow, Monmouthshire's Local Transport Strategy (LTS) sets out MCC's ambitions for transport improvements to Chepstow. These include active travel schemes and a Chepstow Transport Hub to improve both rail and bus linkages and frequency to and from the town with neighbouring settlements, including Severn Tunnel Junction and Bristol. These proposals, along with Highbeech Roundabout improvements, are safeguarded from development in Policy ST5 of the RLDP. Overall, further detailed Transport Assessments (TAs) are to be considered at the planning application stage. Where relevant, the detailed TA has the potential to be informed by the outcome of the Welsh Government's WelTAG assessments.

Air Quality Considerations

An Air Quality Assessment (Rapport, April 2024) submitted to support the allocation has demonstrated at this high-level stage of the proposal that air quality levels at the development site (new receptors) would be below the air quality objective levels in the opening year of 2026 and in future year scenarios.

Nevertheless, air quality impact will be further assessed as part of the planning application process and Policy HA3 criterion (n) of the Plan ensures this will be thoroughly assessed by including a specific policy requirement *for 'the incorporation of satisfactory air quality measures for mitigating and/or reducing emission measures.'* It is considered that key policy requirements such as net zero carbon homes, provision of ULEVs for electric vehicles and provision of active travel routes and public transport improvements will reduce emissions. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.

Visual Impact of the Proposal upon the Wye Valley National Landscape (AONB)

In terms of the visual impact of the proposal upon the gateway to the Wye Valley, a Landscape Visual Baseline (LVB) (EDP, February 2024) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that the site's landscape value is considered medium value and the site's immediate and wider context has a medium overall sensitivity to change. Subject to careful design at all stages and inclusion of the recommendations, there appears to be no landscape or visual reasons which would preclude development of the site. The planning application should be further informed by Landscape and Visual Impact Assessment, which would feed into an iterative design solution.

MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development. It is considered that with appropriate design and layout with development focused on eastern and north western boundaries of the site the proposed development is visually seen as extension of Chepstow's urban boundary. The design layout on the indicative masterplan seeks to retain and emphasise a parkland character by retaining this area as public parkland open space, a requirement set out in Policy HA3 criterion (g). The indicative masterplan also indicates an appropriate woodland buffer retained to the south west St Lawrence Lane boundary with the open countryside/green wedge setting/ setting with the Wye Valley AONB National Landscape, a requirement of Policy HA3 criterion (i). As

such, with these design principles to locate development towards the east of the site and protect and enhance the buffer with the open countryside setting, the landscape impact of the site is acceptable. These high-level landscape design requirements are set out in policies S8 and HA3 and are demonstrated on the submitted indicative Masterplan. Collectively, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies there are considered to be sufficient policy requirements to enable the authority to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will also help to ensure development is acceptable.

Biodiversity Concerns

The site contains groups of mature woodland and mature hedgerows which contain several important natural ecological habitats. The protection and preservation of these habitats is a key consideration in the development of the site. MCC's ecologists note that there are no 'in principle' constraints to the future development of the site subject to implementation of a sensitive masterplan design that incorporates appropriate inherent avoidance, mitigation and enhancement measures and provides net benefit for biodiversity. These policy requirements are set out in Policies S8 and HA3 criteria (j), (k) and (l) of the RLDP.

RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Heritage Concerns

With regards to impact on historic character, the site is outside a Conservation Area, however, Mathern's Conservation Area boundary which includes Wyelands Historic Park and Gardens, is just to the south of the site boundary. The site is also within the parkland setting of the Grade II Listed St Lawrence House, which is located just to the north boundary of the site, along with several other characterful residential properties to the north. Cadw's consultation response to the proposal is that intervening vegetation already provides significant screening of the site from the registered Wyelands Historic Park and Garden and careful design should provide additional screening ensuring that the proposed development will not have a significant impact on their settings. MCC'S Heritage Officer's view is that the retention of the western edge of the site as open parkland on the indicative masterplan ensures the setting of the historic environment can be mitigated. This area is essential for the protection of the listed St Lawrence House and wider historic landscape.

Need for a Hotel

In terms of requirement for a hotel, the Council's Tourism Officer is supportive of the proposal, referencing that the Wye Valley is a prime location for supporting Monmouthshire's visitor economy/ economic growth strategy. This is also reflected within Monmouthshire Destination Plan (2017-2020) and Monmouthshire's Economy, Employment and Skills Strategy, which both support the growth of the tourism industry within Monmouthshire. The scale of commercial provision reflects a balance between the creation of a sustainable community and job provision/ support for Monmouthshire's economy.

HA4 – Land at Leasbrook, Monmouth

A significant number of representations were received concerning the affordable housing-led allocation Policy HA4 - Land at Leasbrook, Monmouth.

The location of the site in relation to designated areas of ecological importance was raised, along with impact on protected species, habitats and the loss of agricultural land.

General impact on the landscape setting was noted, as well as specifically on the Wye Valley National Landscape (AONB). Comments were also made in relation to the site's proximity to the Dixon Conservation Area and Dixon Mound Scheduled Ancient Monument.

The site's potential impact on flooding, surface water run-off and sewerage in the local area was of concern to many respondents, particularly in relation to the River Wye.

Concerns were raised in relation to infrastructure requirements and the impact of the proposed site allocation on existing services that are already overstretched, including education and healthcare.

The impact of the site on the local road network and proximity to the Dixon roundabout was raised by many, along with reference to limited public transport in the area and difficulty achieving active travel routes

Site Selection

Regarding the location of development, in accordance with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP have been located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Monmouth is identified as one of the County's Primary Settlements.

In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. Within the context of the settlement hierarchy and having regard to the site search sequence outlined in national planning policy, Land at Leasbrook (Policy HA4) is considered to be a sustainably located edge of settlement site north of Dixon Road. Key facilities including Monmouth Town Centre, health care, schools and leisure facilities are all located within a 20-minute walking distance of the site, making it very accessible via existing footways and active travel links. The site benefits from close proximity to the Dixon Roundabout offering good links further afield when public transport or use of the private car is necessary. Importantly, the site will deliver the Plan's key policy objectives of delivering 50% affordable housing and net zero carbon homes.

While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6, 6.4.7 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. For further information please see the relevant Candidate Site Assessment Proformas.

Ecological Impact

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA4 includes a number of criteria in relation to nature recovery. This includes two specific criteria d) and e) in relation to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. An additional woodland buffer is required to protect this species and will also offer an enhanced landscape buffer given the site's proximity to the Dixton Conservation Area and Lower Wye Valley Landscape of Historic Interest. A number of ecological surveys have been produced to date to support the allocation. Further ecological surveys will be undertaken with reports submitted at the detailed planning application stage.

The RLDP includes a specific policy (LC5) relating to dark skies and lighting that must be considered as part of a detailed planning application. Criterion d) also refers to the requirement of a lighting scheme and dark corridors being maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats.

HRA

In relation to the ecological concern for the Wye Valley and Forest of Dean Bat Sites SAC, an addendum to the Habitats Regulations Assessment has been prepared by AECOM to provide additional context for the conclusion of the HRA.

This was undertaken to provide an assessment of habitat and bat survey reports prepared for candidate RLDP sites and other available data including protected site condition and radio tracking assessments, for six allocated sites (those in Table 7 of the Local Plan HRA plus Rockfield Road, Monmouth) to assess the impact of loss of functionally linked land through the allocation of sites within the context of the current condition of the SAC and its conservation objectives.

The additional piece of work completed by AECOM more closely considers the principle of allocation and functionally linked land. In accordance with national policy and legislation, project level HRA will subsequently be undertaken to ensure that design and detail do not compromise the Protected Site.

The addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Leasbrook site in line with RLDP policies. It is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat sites will arise.

Agricultural Land

A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the

development of such land via a different spatial strategy. In their representation on the Deposit RLDP, Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. When considering the search sequence recommended in national planning policy, it is noted that most of the land surrounding Monmouth is of BMV status or floodplain.

Heritage Impact

The proposed development is set on the sloping hills to the north of Dixton adjacent to the existing development edge. The proposals are not considered to have a detrimental impact on the setting of the Monmouth Conservation Area as it is sufficiently far away from the boundary as not to be read as adjacent to the Conservation Area. Dixton Conservation Area has two distinct parts, north and south of the roundabout. The southern part is a small self-contained area around the church and school which given that it is separated by the road, would not be harmed by the proposed development. To the North is a collection of listed and unlisted buildings which would remain unaffected. The development will be informed by a development brief to ensure the fringes of the development are sensitively designed.

The original Candidate Site submission related to a wider area directly adjacent to the Dixton Mound SAM. The site has subsequently been significantly reduced in size, with the closest part to the SAM now approximately 190m from the site. An updated heritage impact assessment will be required to support any planning application on the site.

GGAT note a desk-based assessment and geophysical survey is required prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

Landscape Impact/Impact on the Wye Valley National Landscape

Strategic Policy S8 and Policy HA4, along with Policy S5 and supporting DM policies LC1- Landscape Character and LC4 – Wye Valley National Landscape (AONB), will appropriately enable the authority to address concerns of impact on landscape character and visual amenity.

A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage. Separate requirements and tools under other legislation such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will help to ensure development is acceptable.

Policy HA4 includes criterion b) which requires development proposals to consider existing topography, assets, features and contours of the site and notes this should include measures to integrate development appropriately while reducing visual impact. This policy criterion also notes that less dense development should be provided on the northern and eastern edge of the site.

Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be

unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, the site-specific infrastructure requirements of the allocated sites are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advised that there is currently capacity in primary schools within the locality. There is, however, a need for contributions towards secondary school pupil places. The latest position with education will be reviewed at the planning application stage.

While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the Aneurin Bevan University Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole.

Highways/Accessibility Considerations

The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.

Regarding the road network, MCC Highways agree with the Transport Statements produced to date but note that further information will be required at the detailed planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle.

Given that the entrance to the site is within an area of floodplain, an emergency access will be provided to allow for a secondary means of access if required in an extreme flooding event, details of which will be considered at the planning application stage.

In addition to this, criterion i) of Policy HA4 relates to the provision of off-site highway improvements as necessary, having regard to the requirements arising from the Transport Assessment, and also includes specific reference to junction mitigation/improvement measures and a public transport link if necessary.

The site could be served by a number of bus services. Consideration will be given to opportunities for service rerouting, details of which will be determined at the planning application stage. The IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency.

Active Travel Links and Footpaths

Policy HA4 includes criterion h) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the new development area. This includes key connections including a footpath link to

	Dixton Close and along Dixton Road which will enable links to further active travel routes in Monmouth. Space within the site boundary must also be included to allow provision of a future active travel route. <u>Flood Risk and Surface Water Run-Off Considerations</u> Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies a small area on the southern part of the site as being located within Flood Zone 2 and 3, and while this does not form part of the built development area of the site, the access to the site is located in this area. Criterion j) of Policy HA4 reflects this noting that the development of the site must be suitably assessed in accordance with TAN15 including consideration of flooding in extreme events on Dixton Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. <u>Dŵr Cymru Welsh Water</u> Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and advised that there are no issues with accommodating the foul flows from the site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system and to inform the extent of any necessary water infrastructure and sewerage upgrades to ensure there is no detriment to existing customers' supply and that there is sufficient hydraulic capacity to accommodate the site. This information would not be required until the planning application stage. The IDP also includes the latest position in relation to upgrades to the Monmouth Wastewater Treatment Works (WwTW) to include phosphate stripping capability, noting this is included in AMP 7 2020 –2025. The impact of development on water quality will be scrutinised as part of the planning application process in consultation with relevant bodies, including NRW and DCWW, to ensure there are no adverse impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW.
HA5 – Land at Penlanlas Farm, Abergavenny	Comments received in relation with the proposed site allocation HA5 – Land at Penlanlas Farm, Abergavenny were predominantly objections from private individuals. Concerns raised focussed on the loss of a greenfield site and the potential impact on Bannau Brycheiniog National Park (BBNP) and general landscape. Concerns were also raised in relation to the approach taken to the Green Wedge designation in the locality of the allocation. The impact on ecology and loss of a SINC on a section of the site, along with the potential impact on the River Usk SAC and nearby Sugar Loaf SSSI/SAC was also raised.

Highways concerns focussed on the unsuitability of Old Hereford Road to accommodate additional traffic and also within Abergavenny more generally. The proximity of the site to local services was also noted. Flood risk concerns from surface water run-off, both from above the site into the site and from the site to adjoining land, were raised. Potential noise and residential amenity issues from the adjoining electricity sub-station were also noted.

Site Selection/Greenfield Development

The overall spatial strategy of the Replacement Local Development Plan reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the County's primary settlements, including Abergavenny. Within this context and having regard to the site search sequence outlined in national planning policy, Land at Penlanlas Farm, is considered to represent a logical extension to the defined urban area of Abergavenny, benefitting from good connectivity to a range of services. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.

Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements.

Green Wedge

With regard to the green wedge concerns, the Green Wedge Assessment, prepared by LUC (March 2024) as background evidence to the RLDP, assesses two parcels of land in the vicinity of the site allocation – AG9 and AG10 (see Green Wedge Assessment for a plan). In relation to parcel AG9, the assessment concludes that the land makes a moderate contribution to managing urban form, safeguarding the countryside from encroachment, protecting the setting of an urban area, and plays a moderate buffer role. It concludes that overall, the potential for green wedge designation is moderate. The proposed allocation at Penlanlas Farm is largely contained within parcel AG9.

With regard to parcel AG10, the assessment concludes that the parcel makes a strong contribution to managing urban form, safeguarding the countryside from encroachment, protecting the setting of an urban area, and plays a moderate buffer role. It concludes that overall, the potential for green wedge designation is moderate-high. The north-western section of the proposed allocation falls within Parcel AG10. However, as outlined in the GI Masterplan (March 2024) for the site, this land is to be retained as GI/public open space, retaining an open aspect to the north-western section of the allocation, consistent with the surrounding and adjoining green wedge designation. The built form of the proposed allocation is primarily within the 135m contour line with a proposed buffer between the site and the Bannau Brycheiniog National Park (BBNP) boundary. Its inclusion in the HA5 allocation is, however, important to providing access to the site and contributing to the site's net-biodiversity and green infrastructure requirements, as well as securing an appropriate buffer between the residential development and the national park/settlement edge of Abergavenny.

PPW 12 notes that green wedges may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. It notes that green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Ensuring 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 pressure in the area and the need to minimise demand to travel.

Having regard to PPW, the RLDP's growth and spatial strategy, the overarching site selection process, and the findings of the Green Wedge Assessment, a green wedge designation has been made on the north-western edge of Abergavenny, on land to the north of allocation HA5 – Land at Penlanlas Farm. Consistent with the approach taken to determining green wedge designations in the RLDP, which designates land with a moderate-high or above rating, Parcel AG10 is designated as a green wedge with the exception of approximately 1ha of land, which is within the boundary of allocation HA5, and as noted above is identified as a buffer zone.

Bannau Brycheiniog National Park/Landscape Impact

With regards to the landscape impact of proposed site allocation HA5 – Land at Penlanlas Farm, Abergavenny, in response to ongoing dialogue between the site promoters and the Council including the Landscape Officer, a reduced density from that proposed in the candidate site submission is proposed for allocation. The scale and proposed development area retains the visual integrity of the relationship between Abergavenny's urban boundary and that of the Bannau Brycheiniog National Park (BBNP) field slopes and upland landscape and is outlined in the site's supporting evidence. The site submission has responded to landscape concerns and brought the development primarily within the 135m contour line in areas to the south of the existing substation with a proposed buffer that can accommodate substantial tree and hedgerow planting.

Site specific policy HA5 seeks to ensure that the proposed site allocation integrates effectively and respects the proximity of the BBNP, existing setting and character. HA5 criterion (a) 'Incorporation of lower density development on the northern edge of the site and buffer zone to the north-west of the site to integrate it into the landscape' and HA5 criterion (c) 'Preserve or enhance the landscape setting of the BBNP and have no adverse impact on the International Dark Skies Reserve designation' provide development management ability to ensure that development layout, landscaping, colour and ridge heights take into consideration setting and impacts.

Collectively, Strategic Policy S8 – Site Allocation Placemaking Principles, Policy HA5 – Land at Penlanlas Farm, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies are considered to be sufficient to enable the authority to address concerns of impact on landscape character and visual amenity. Separate requirements and tools under other legislation, if required, such as The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and PPW12 will also help to ensure development is acceptable.

Ecological Impact

Having regard to the Preliminary Ecological Appraisal (August 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures, further details of which will be required at the planning application stage. Policies HA5 and S8 establish high-level policy requirements in this respect. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Approximately 2.5ha of land on the southern part of the site is identified as a Site of Interest for Nature Conservation (SINC) due to the presence of grassland. However, MCC Ecology section has confirmed that the SINC was destroyed after MCC consulted on the Adopted Local Development Plan (LDP). Whilst the candidate site assessment proforma notes that there was a SINC on part of the site, the Ecology team has since worked on the basis that it was destroyed, seeking instead to take the opportunity to restore grassland as part of the site's Green Infrastructure (GI).

The site is close to the Sugar Loaf Woodlands SSSI/SAC, which is noted for its woodland features. Potential recreational pressure on the Sugar Loaf SSSI/SAC has been considered as part of the Deposit Habitats Regulations Assessment which concludes that given the steep gradient of the SAC, this restricts visitor activities to the main paths and the site is under appropriate management by the National Trust, and the site's allocation will therefore not lead to adverse effects on site integrity regarding recreational pressure (page 63 – HRA, September 2024).

Highway/Accessibility Considerations

With regards to highway considerations, it is proposed to construct a new access onto Old Hereford Road, including the enhancement and widening of Old Hereford Road to provide the necessary carriageway width and inclusion of a 2m footway in accordance with Policy HA5 – Land at Penlanlas Farm. These arrangements are considered to be acceptable in principle with MCC Highways Section. The existing highway routes are also considered able to accommodate the associated traffic generation and distribution of traffic. Further Transport Assessments will be undertaken as part of the planning application process.

In terms of public transport provision, the allocation is in an area served by public transport, both bus and rail provision, with bus stops located on Llwynu Lane, Charles Crescent and Firs Road. Policy HA5 – Land at Penlanlas Farm, requires the incorporation of pedestrian and cycle linkages to key access points including the north-eastern corner of the site, south-eastern corner of the site and Old Hereford Road, linking up with the bus network.

Flood Risk and Surface Water Run-Off Considerations

The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

	<u>Proximity to Electricity Sub-Station</u> With regard to the proximity of the site to the adjoining electricity sub-station, Policy S8 – Site Allocation Placemaking Principles and Policy PM2 – Environmental Amenity, establish policy requirements to ensure residential/environmental amenity is addressed during the planning application process. A Noise Impact Assessment and appropriate mitigation measures such as a landscape buffer, tree planting and noise attenuation will be considered as part of the proposal. <u>Impact on the River Usk SAC Catchment Area</u> The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW confirmed that it is committed to delivering upgrades to the Llanfoist Wastewater Treatment Works (WwTW) to include phosphate stripping capability. It has advised that capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of the upgrade scheme at the Llanfoist WwTW.
HA6 – Land at Rockfield Road, Monmouth	The number of responses received in relation to Land at Rockfield Road, Monmouth (HA6) were limited. Some support for the site was provided, noting it is in a discrete location with good active travel links to nearby industrial estates and the town centre. Concerns were raised in relation to flooding impact, strain on infrastructure, loss of green space and increase in traffic. Some reservations were noted concerning the access of the site. <u>Site Selection</u> Regarding the location of development, in conformity with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP are located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Monmouth is identified as one of the Primary Settlements. Within this context and having regard to the site search sequence outlined in national planning policy, Land at Rockfield Road, Monmouth is considered to represent a logical extension to the defined urban area of Monmouth, benefitting from good connectivity to a range of services. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives and facilitates the delivery of a range and choice of sites within the Plan period. <u>Infrastructure</u> Planning Policy Wales (2024) notes that where new housing is proposed developers, will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, site-specific infrastructure requirements of the proposed site allocations are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plan's sites allocations and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education

	requirements. MCC education advised that there is currently capacity in primary schools within the locality. There is, however, a need for contributions towards secondary school pupil places. The latest position with education will be reviewed at the planning application stage. While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the Aneurin Bevan University Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole. <u>Flood Risk and Surface Water Run-Off Considerations</u> Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning identifies a small amount of flood zone along the boundary of the site. As a consequence, a Flood Consequences Assessment has been produced and colleagues in the Flooding and Drainage Team are satisfied this is suitable for allocation of the site and will be considered further at the planning application stage once full details of the site are known. <u>Site Access</u> The housing site is not proposed to be accessed via Kingswood Road. It is proposed to construct a road access into the adjacent site with extant planning permission for 70 homes, which will be accessed directly from Rockfield Road. This arrangement is considered to be acceptable with MCC Highways, who note the site junction and the impact of development traffic on the immediate local network would be acceptable.
HA7 – Land at Drewen Farm, Monmouth	A limited number of responses were received in relation to Land at Drewen Farm, Monmouth (Policy HA7). The concerns raised related primarily to the access of the site through the first phase of the site at Kingswood Gate. The potential for flooding was noted, including increased surface water flooding. The Land at Drewen Farm, Monmouth (Policy HA7) forms the remaining part of the adopted LDP Wonastow Road housing site in Monmouth known as Kingswood Gate. This site was granted outline planning permission on 09/09/2025 for the development of up to 110 homes under the reference DM/2024/01295 subject to signing of a S106 agreement.
HA8 – Land at Tudor Road, Wyesham, Monmouth	The Land at Tudor Road, Wyesham (Policy HA8) allocation did not receive any comments. The proposed allocation at Land at Tudor Road, Wyesham is a site allocation that has been rolled forward from the adopted LDP. This site was granted planning permission on 26/03/2025 for the development of 50 affordable homes under the reference DM/2024/00557.

HA9 – Land at Former MOD, Caerwent

Comments received in relation to proposed site allocation Land at Former MoD, Caerwent (Policy HA9) included some support given the site is previously development land and is proposed for mixed-use development, including employment uses. However, a number of concerns were raised in relation to the impact on the biodiversity (due to protected and priority species being within the site) and highway safety concerns were raised with the site being accessed off the dualled A48 highway. Concerns were also raised in relation to the cumulative impact of the development in the area upon infrastructure, with this proposal alongside other strategic sites identified in the Severnside area (HA2 – Land east of Caldicot North of Portskewett and HA3 – Land at Moun-ton Road, Chepstow). Further concerns were noted with regard to surface water drainage, foul waste, environmental health (with regard to potentially developing on contaminated land and immediately adjacent to MOD land), and visual impact on Caerwent’s Roman Village.

Site Selection

The support for the brownfield allocation at Caerwent is welcomed. The Plan’s site search sequence has prioritised the use of suitable brownfield sites before considering greenfield sites, albeit it is recognised that brownfield sites are limited in the County. The site, therefore, is considered to be suitable for development in the Severnside Region as is one of the County’s only brownfield sites. As a mixed-use allocation, the site includes B1 employment use (as well as residential use) which will provide economic opportunities in the local area, supporting sustainable economic growth.

Ecological Impact

In relation to concerns regarding the destruction of the existing habitats on the site, there are policies in place in the RLDP, as well as national legislation, to safeguard and protect these habitats. Collectively, Policy HA9 criteria (d)-(g), Policy S8 – Site Allocation Placemaking Principles, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and NR1 Nature Recovery and Geodiversity are considered to be sufficient to enable the authority to maintain and protect habitat population species. Separate requirements and tools under other legislation, if required, such as The Environment Act (Wales) 2016 Section 6 Duty and PPW12 will also help to ensure development has an acceptable impact upon biodiversity considerations.

Highways Impact

In terms of the highway concerns raised, a Transport Assessment (Asbri Transport Ltd. Jan 24) has been submitted which concluded that the proposed land use would result in a negligible change in traffic flows on the local highway network. Where the impact is greatest, at the site access, the operation of the highway network is not negatively impacted. Further analysis and consideration of the vehicular access design arrangements and safe pedestrian crossing to access the south of the A48/connection to Caerwent Village is required, as set out in Policy HA9 criterion (h), as well as Policy S8. These matters will be further considered and addressed at the planning application stage.

Impact on Local Infrastructure

With regard to the cumulative impact of the allocation with other strategic allocations in the south of the County, the infrastructure required to support these allocations has been thoroughly assessed. An Infrastructure Delivery Plan (IDP) set out in Appendix 8 of the Plan, identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of a sites. It is also relevant to note that there are wider improvement schemes being investigated to improve infrastructure provision in the Severnside area, for example the public transport services and active travel routes between the settlements in Severnside with potential to

	connect to Caldicot , particularly with the opportunity to do so with the strategic site development of HA2 Land to the East of Caldicot/North of Portskewett allocation. In terms of the foul waste, DCWW have confirmed the delivery of a scheme at Caerwent's Welsh water Treatment Works (WwTW) by January 2027 and accordingly have advised that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of a scheme. DCWW also advise that a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system. The developers will be expected to fund investigations during pre-planning stages and the findings of the HMA would inform the extent of any necessary water infrastructure upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). <u>Drainage</u> In terms of surface water drainage, the preliminary site investigation work has indicated surface water outfall over third party land. MCC's Drainage Officer has specified that the proposals will require further SuDS features and there should be multiple basins and swales across the site, which is set out in Policy S8. Further drainage details are to be determined through the Sustainable Drainage Approving Body (SAB) process and the planning application assessment process. <u>Amenity Impact</u> Air quality and noise assessments will be required due to the site's close proximity to the A48 and the close proximity of the MOD training centre. Environmental health considerations including air, noise and lighting impacts will be further assessed as part of the planning application process. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution. <u>Heritage Impact</u> With regard to the impact on Caerwent's historic village, it is both Cadw's and MCC'S Heritage Officer's view that due to the existing intervening vegetation and separation from the Roman Town by the A48 highway, any effect of the development upon Caerwent's historic character and nearby Scheduled Ancient Monuments will be minimal.
HA10 – Land South of Monmouth Road, Raglan	Comments received in relation to proposed site allocation HA10 – South of Monmouth Road, Raglan were predominantly objecting to its inclusion in the RLDP as a housing allocation. The concerns raised focussed on the need for the allocation in the first instance and the resultant loss of greenfield and Best and Most Versatile Agricultural Land. The allocation is also considered to be contrary to a previous appeal decision to refuse 111 houses on land that incorporates the allocation. The heritage impact on Raglan Conservation Area and Raglan Castle and were also raised as significant concerns with the allocation. Ecological concerns due to the loss of a greenfield site are also noted. Concerns with the general infrastructure to accommodate the site and more specifically the highway network were also raised. Reference to the site regularly containing surface water run-off and the impact developing the land in relation to flood risk were noted.

Site Selection/greenfield development/loss of Best and Most Versatile Agricultural Land

The overall spatial strategy of the Replacement Local Development Plan reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the County's primary settlements, with the majority of growth directed to these. However, a lower level of growth is directed towards the County's Tier 2, Secondary Settlements, to deliver much needed affordable housing along with addressing the RLDP's core objectives of rebalancing our demography and supporting sustainable economic growth whilst responding to the climate and nature emergency. Within this context and having regard to the site search sequence outlined in national planning policy, Land South of Monmouth Road, Raglan is considered to represent a logical extension to the defined urban area of Raglan, benefitting from good connectivity to Raglan's centre and associated services and facilities. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.

Baseline information relating to key design and placemaking principles have been established as part of the on-going dialogue between the Council and the site promoters, with an indicative parameters plan that has evolved informing the spatial layout and constraints, requirements and opportunities. The proposed scale of development is considered appropriate within the context of the overarching growth and spatial strategy and Raglan's position as a Tier 2 settlement, allowing for a proportionate level of growth to address the RLDP core objectives.

Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development, including the provision of homes and economic growth, and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework.

Similarly, a key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response to the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and, where there is a loss of BMV land, how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV land will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.

Minister for Housing and Local Government's Decision to refuse permission for 111 dwellings on the site

Planning application DM/2018/01050 for 111 dwellings on land including the proposed allocation was refused on appeal in 2019 following a decision by Welsh Government to call-in the planning application to be determined by Welsh Ministers. The decision letter issued on 3rd October 2019 by the Minister for Housing and Local Government concluded that "the present need for housing that has been identified,

when taking account measures to secure a replacement LDP, does not justify permitting the scale of development on the edge of this rural village. In reaching this conclusion, the Inspector is mindful of the primacy of the development plan in decision making, not least given the degree of certainty, transparency and engagement this provides to all stakeholders, including local communities.”

Having regard to the Minister’s Letter, the site has been promoted through the candidate site and Replacement Local Development Plan process and has been subject to consultation, and as noted above, is justified within the context of the RLDP’s overarching strategy and, therefore, addresses the concerns of the Inspector in refusing permission. Furthermore, a reduced area to that submitted as part of the candidate site process, of 4.5ha, is proposed for allocation, representing a proportionate level of residential growth appropriate to Raglan’s positioning in the settlement hierarchy.

Heritage Impact

MCC’s Heritage Officer has advised that key vistas and sightlines will be maintained allowing the Castle to remain as a key landmark. This will maintain the integrity of Raglan’s Conservation Area and the setting of Raglan Castle. Through the integration of placemaking principles and enhanced green infrastructure and other policy requirements set out in Policy HA10 including limitations on building heights, the proposed allocation is not considered to detrimentally harm the setting of the Castle or wider views.

Highways Impact

MCC highways has confirmed that the traffic analysis submitted indicates that the additional traffic generated by the proposed development will be negligible and the impact on the safety and capacity of the surrounding highway network is expected to be minimal. In addition, the site is served by public transport, with bus stops located on Monmouth Road. Policy HA10 – Land South of Monmouth Road, Raglan, requires off-site highway infrastructure improvements including the widening and improvement of the existing footway on Monmouth Road and a financial contribution to improve public transport services and nearby infrastructure as required. Details of this will be determined at the planning application stage.

The incorporation of good quality, safe, legible and accessible pedestrian and cycle linkages to key access points is a policy of requirement of Policy HA10 – Land South of Monmouth Road, which will provide access beyond the site boundaries.

Ecological Impact

Having regard to the Preliminary Ecological Appraisal (September 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures, further details of which will be required at the planning application stage. Policies HA10 and S8 establish high-level policy requirements in this respect, with specific nature recovery policy considerations set out in NR1 – Nature Recovery and Geodiversity. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity.

Flood Risk and Surface Water Run-off

	The Flood Map for Planning does not identify any tidal or fluvial flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. <u>Impact on Local Infrastructure</u> With regards to the provision of infrastructure, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. It sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans site allocations. The Council has and will continue to work with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW advised that capacity is available at the Raglan WwTW to accommodate foul flows from the proposed allocation.
HA11 – Land East of Burrium Gate, Usk	Land East of Burrium Gate, Usk, raised a large consultation response to the proposal and although there was some support for the provision of 50% affordable homes in the locality where house prices are high, concerns were raised as to whether the provision of 50% affordable homes was viable and whether the proposed affordable homes would go to local people. Some concerns were noted with regard to appropriate transport and sewerage infrastructure being in place to support the development. There were also concerns in relation to flood risk, including that the proposed development of the site would exacerbate flood risk in the area, and to existing properties in close proximity. Other concerns raised included the visual impact of the proposal on the setting of Usk due to loss of greenfield land and the site's elevated position, impacts on protected habitats and the adjacent SINC, and nutrient pollution concerns of the River Usk Special Area for Conservation (SAC). Traffic and pollution concerns were also noted, particularly as there is an Air Quality Management Area (AQMA) in close proximity to the site. <u>Provision of Affordable Homes</u> The provision of affordable housing is a key objective for the Council which is reflected in the RLDP's objectives and policy framework, with a requirement for 50% affordable homes on new site allocations. The RLDP aims to secure its deliverability through the policy requirements set out in Policy S7 Affordable housing and Policy S8 Site Allocation Placemaking Principles. Site promoters of the site allocations have

completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, and other key requirements, without subsidy.

With regards to the allocation of affordable housing to local people, the Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, such as Usk. The rural allocations policy provides additional criteria to demonstrate rural local connection to a particular area.

Flood Risk and Drainage Considerations

In relation to the flooding and drainage concerns, the Flood Map for Planning does not identify any flood zones on the site. The Strategic Flood Consequence High Level Assessment also concludes that the site's location is outside identified flood risk areas. Nevertheless, concerns have been raised with regard to the management of overland flows of water and impact this may have on land outside of the site, which will be required to be taken into consideration within the flood consequence assessments for the planning application. This requirement is set out in the policy requirements for the site Policy HA11 criterion (f) 'A scheme for the management of overland flows from adjacent land will need to be included to ensure existing overland flood risk has been accommodated'.

With regard to surface water drainage management of the site, the preliminary site investigation work has indicated surface water outfall over third party land. MCC's Drainage Officer has specified that the proposals will require further SuDS features and there should be multiple basins and swales across the site, which is stipulated in Policy S8. The drainage details will also be required to the assessed and agreed through the Sustainable Drainage Approving Body (SAB) process, a separate regulatory framework which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. Development will not be able to take place unless there is a SAB approval as well as planning consent.

Landscape Impact

In terms of the elevation/topography and visual impact assessment of the site, a preliminary Landscape Visual Appraisal (LVA) (RPS August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that subject to careful design at all stages and inclusion of the recommendations there appears to be no landscape or visual reasons which would preclude development of the site. MCC's Landscape Officer has reviewed this information and considers the site to be suitable for residential development. It is considered that with retention of existing hedgerow boundaries and a design that responds to the site's topography with a development ridgeline of no more than 40m Above Ordnance Datum (AOD), a proposal can be integrated effectively into the landscape as an urban extension to Usk. These high level landscape design requirements are set out in policies S8 and HA11 criterion (a) '*Any future planning application should be further informed by Landscape and visual impact assessments, which would feed into an iterative design solution.*'

Ecology Impact

In relation to the protection of habitats at the site, a Preliminary Ecological Appraisal has been submitted which has appraised the site for its ecological value and has been reviewed by MCC ecologists, who consider the site is suitable for residential allocation with appropriate mitigation and compensation, further details of which will be required at the planning application stage. Furthermore, there are policies in place in the RLDP as well as national legislation to safeguard their protection. Collectively, Policy HA11 criteria (b) and (c) and Policy S8 – Site Allocation Placemaking Principles, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and NR1 Nature Recovery and Geodiversity are considered to be sufficient to address concerns of protecting habitat population species. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Further detailed habitat survey work and assessments will be required at planning application stage.

River Usk Special Area for Conservation (SAC)

With regard to phosphate neutrality obligations for the River Usk, NRW have completed an environmental permit review and confirmed that the consent limit of 5mg/l is applicable for the treatment of foul flows. With this permit information, DCWW has confirmed a commitment that it is delivering a scheme to upgrade Usk's Wastewater Treatment works (WwTW) and accordingly advise that capacity (the 5mg/l consent limit set by the permit) will be accommodated at Usk WwTW, upon completion of the upgrade scheme. On a more general level, all proposals are required to satisfy Policy NR3 –Protection of Water Sources and the Water Environments and development proposals will be assessed in consultation with NRW who are the regulatory body for ensuring that there is no unacceptable impact on the water quality of the River Usk SAC River.

Highway Impact

In terms of traffic impact, a Transport Statement (Norman Rourke Pryme, March 2025) has been submitted which has provided initial evidence that the highway network is capable of accommodating an additional 40 dwellings. Further analysis and consideration of the proposed vehicular access design arrangements, and safe pedestrian crossings and the widening of the existing footways along Monmouth Road, will be undertaken at the planning application stage. This is a requirement of Policy HA11 criterion (d). The proposal will also be required to accord with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and opportunities to facilitate a modal shift from the private car to sustainable forms of travel. The site will therefore be designed to maximise sustainable travel opportunities to the town centre, as reflected in Policy S8 and Policy HA11.

Amenity Impact

In terms of exacerbating existing environmental problems and air quality concerns, Policy HA11 criterion (e) requires the incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Moreover, it is considered that key policy requirements, such as net zero carbon homes, provision of ULEVs for electric vehicles and active travel routes, together with public transport improvements will reduce emissions and provide the catalyst for behaviour change and improve the health and well-being of people. On a more general level, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution.

HA12 – Land West of Trem Yr Ysgol, Penperlleni

Comments received in relation to proposed site allocation HA12 – Land West of Trem Yr Ysgol, Penperlleni were predominantly objections from private individuals. One of the main concerns raised was the proposed access arrangement of the site, which is proposed off the existing cul-de-sac highway Trem Yr Ysgol (a recent new build residential development in Penperlleni that was allocated in the current adopted LDP SAH10(ii)). A private management company manage and maintain the green open space that the proposed access of the site is to be constructed across, funded by residents of the recent development. There is a legal agreement in place for the management company to manage this open space. Other concerns raised relate to highway safety (vehicles would travel past the school and through the existing housing development to access the site), the site not being located in a sustainable location, flooding due to existing watercourses on the site, wildlife and environmental impacts, as well as landscape impact upon the surrounding Bannau Brycheiniog National Park and capacity of the sewerage infrastructure within the site. There were also concerns raised in relation to the Deposit Plan consultation and transparency of the process.

Access Concerns and Highway Impact

In response to the access concerns, the point of access into the site is still being considered off Trem Yr Ysgol, and an alternative option of direct access off the A4042 is also being explored with Welsh Government Highways.

In terms of highway capacity, MCC highway authority has indicated they would not object to the extension of the existing estate road to serve an additional 42 dwellings but it is essential that sustainable travel options are accessible and provided, and it must be clearly demonstrated that the estate road can accommodate the increased levels of traffic and that adequate off-street parking can be provided to avoid obstructive on-street parking. Further assessment and consideration of the access and highway safety considerations are required with a submission of a Transport Assessment.

Sustainable Location Concerns

The overall spatial strategy of the RLDP reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the County's primary settlements, with the majority of growth directed to these. However, a lower level of growth is directed towards the County's Tier 2, Secondary Settlements, to deliver much needed affordable housing along with addressing the RLDP's core objectives of rebalancing our demography and supporting sustainable economic growth whilst responding to the climate and nature emergency. Within this context and having regard to the site search sequence outlined in national planning policy, Land West of Trem Yr Ysgol is considered to represent a logical extension to the defined urban area Penperlleni, located in close proximity to Penperlleni's existing facilities and services.

The edge of settlement location provides the opportunity to promote sustainable travel and connectivity into Penperlleni for some facilities, such as the local primary school and village shop, public house which are less than a 10 minute walk away. The site is in an area served by bus Public Transport. There is a southbound stop within 400m of the site and the design of the site must prioritise connections to public transport as set out in Policy S8 and HA11 (d) which specifies a pedestrian link to the southbound bus stop. A financial contribution towards improved connections to public transport maybe required and further consideration of this will be undertaken as part of the planning application process.

Flood Risk and Drainage Considerations

With regards to flooding and drainage concerns, the Strategic Flood Consequence High Level Assessment concludes that there are minimal flood risk considerations to the allocation with 0% of the site is within Zones 2 & 3 for Sea and Rivers and 1.87% of site are within Zones 2 & 3 Surface Water. Flood risk at this site is, therefore, considered minimal and in accordance with TAN15 (2025). MCC's Drainage Officer has assessed the information and confirmed that surface water drainage can be managed at the site. The drainage details will also be required to be assessed and agreed through the Sustainable Drainage Approving Body (SAB) process, as separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government.

Ecology Impact

In relation to wildlife and habitat concerns, a preliminary Ecological Appraisal has been submitted which identifies the site as having priority hedgerows, mature trees, protected species potential and an ecologically important watercourse. The protection and preservation of the watercourse, site hedgerows and mature trees are therefore key considerations in the development of the site. These policy requirements are set out in S8 and HA12 (b) and (c) of the RLDP. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Landscape Impact

With regard to landscape impact on the BBNP, a preliminary Landscape Visual Appraisal (LVIA) (Viridian Landscape Planning August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined the landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. MCC's Landscape Officer considers the site from a landscape perspective to be suitable for residential development, with the value of the surrounding landscape being its setting within the backdrop of the BBNP. It is considered that with retention of existing hedgerow boundaries and a design that responds to key views of the BBNP, development can be integrated effectively into the landscape as an urban extension. These high level landscape design requirements are set out in policies S8 and HA12 criterion (a), as well as landscape policies LC1 Landscape Character and LC3 Bannau Brycheiniog National Park.

Watermains Pipe

The site promoter and LPA are aware of the watermains pipe that runs through the northern section of the site, and development will be outside the buffer easement of the pipe. The masterplanning of the site will be done in consultation with Dŵr Cymru Welsh Water, the regulatory body of the watermains and they will advise on the buffer requirements.

RLDP Consultation and Candidate Site Assessment Process

With regards to the concerns over the consultation and candidate site assessment process, the RLDP has been prepared in accordance with relevant legislation and regulations. Of note, the RLDP Delivery Agreement (DA) (Revised October 2024) sets out the timetable for Plan preparation and the Community Involvement Scheme (CIS). The CIS sets out how the Council proposes to proactively involve the community

	and stakeholders in the preparation of the RLDP in order that a range of views can be considered as part of the process of building a wide consensus on the Plan's strategy and policies. In accordance with the DA, the Council undertook extensive consultation and engagement with stakeholders and our local communities during the public consultation on the Deposit RLDP. This included numerous drop-in engagement events throughout Monmouthshire. As part of that consultation a range of views and considerations have been captured and addressed in the Consultation Report on the Deposit RLDP. There will be further opportunity for representors to discuss issues raised at the examination of the RLDP. The Candidate Site Assessment process is based on the SEWSPG (South East Wales Strategic Planning Group) proposed methodology which seeks to establish a common baseline methodology in relation to candidate sites for South East Wales local planning authorities to adhere to when preparing their RLDPs. The SEWSPG approach has been adapted to suit local circumstances in Monmouthshire and updated to reflect guidance in the Welsh Government Development Plans Manual Edition 3 (March 2020). For further information on the candidate sites process refer to the Candidate Sites Assessment Methodology, the Candidate Sites High Level Assessment and Candidate Site Assessment Report.
HA13 – Land adjacent to Piercefield Public House, St Arvans	Comments received in relation to proposed site allocation HA13 – Land adjacent to Piercefield Public House, St Arvans were predominantly objections. Concerns raised related to the need for the allocation, due to the close proximity of the strategic site allocation HA3- Land at Moun-ton Road Chepstow, impact on the surrounding biodiversity, and the potential impact upon the surrounding Wye Valley National Landscape (AONB). Several concerns were also raised in relation to its impact upon Regionally Important Geodiversity Sites (RIGS) as it is part of the catchment of groundwater for the underlying Otter Hole cave system. <u>Need for the Allocation/ Site Selection</u> The site adjacent to the Piercefield Public House, St Arvans, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP). The edge of settlement location near St Arvan's settlement also provided the opportunity to promote accessibility and connectivity to facilities in St Arvan's including the local public house, church, and recreation facilities such as playing fields and public open space. Chepstow Town Centre is also in close proximity, approximately 1.8 miles away, providing access to a wide range of services and facilities, including retail and leisure facilities, primary and secondary schools and Chepstow's Train Station. There are exiting sustainable travel links to Chepstow with provision of a bus service, and it is considered to be within reasonable distance, as per the Active Travel Wales guidance, to walk/cycle into Chepstow. The site is, therefore, considered to be suitable for small scale residential development within this context and having regard to the site search sequence.

	<u>Biodiversity Impact</u> In terms of impact on biodiversity, a Preliminary Ecological Appraisal (aspect ecology 2021) has been submitted which has identified the site as unmanaged scrubland vegetation of limited ecological importance. The invasive Japanese knotweed is present within the site which is detrimental to the site value. Development of the site would allow for the eradication of this species, therefore, providing enhancement to biodiversity. This will be controlled through the planning application process. The site has also been identified as having Protected and Priority Species present, however, MCC's ecologists have confirmed that their presence is unlikely to prevent development if appropriate mitigation and compensation is provided and that the site has the potential to provide net benefit for biodiversity, further details of which will be provided at the planning application stage. Policies HA13 and S8 establish high-level policy requirements in this respect. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. <u>Landscape Impact</u> The site is located within the Wye Valley (AONB) National Landscape. A Landscape Visual Impact Appraisal (LVIA) (ES Landscape planning, August 2021) has been submitted, which has identified the baseline conditions of the site and surrounding area and determined those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. Overall, the report concludes that the proposals would result in a negligible magnitude of change within the localised setting of its rural context. MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development. It is considered that with appropriate design and layout, with retention of existing boundaries and well designed connections between existing settlement edge and appropriate density, development can be integrated effectively into the landscape as a settlement extension. These high level landscape design requirements are set out in Policy S8 and Policy HA13 criterion (a), which ensures key views of the Wye Valley National Landscape (AONB) setting are respected. Collectively, these policies, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity. <u>RIGS</u> The site is adjacent to the existing settlement of St Arvans where there is existing development above the existing geological resource. The impact on the RIGS will be considered further as part of the planning application stage. The development proposal will be assessed in consultation with NRW and the South East Wales Geodiversity group (SEWRIGS).
HA14 – Land at Churchfields, Devauden	Comments received in relation to proposed site allocation HA14 – Land at Churchfields, Devauden were predominantly objections from private individuals. These concerns were centred around the suitability of the location for a housing allocation with concerns that development here will add further pressure to local healthcare, social care and schools. Points were also raised in relation to highways, lack of public transport and active travel options in Devauden, impacts on the surrounding Wye Valley National Landscape (AONB), and impacts on ecology, including the

location of nearby grassland SINCs to the proposed site. Concerns were also raised with regards to current Wastewater Treatment Work (WwTW) being at capacity.

Site Selection

The Land at Churchfields Devauden, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).

The site has been allocated as part of the RLDP growth strategy to sustain existing communities by provision of affordable homes and strengthening our rural economy and will help to sustain the village for future generations and provide affordable housing to address housing need in the locality. The edge of settlement location provides the opportunity to promote accessibility and connectivity into Devauden's existing facilities, including the local church, community hall, playing fields and public open space. With regard to concerns of the lack of school capacity, as set out in the Infrastructure Delivery Plan (IDP) (Appendix 8 of the Plan), capacity in the local schools, both primary and secondary, will be reviewed at the time of the planning application to determine whether financial contributions are required.

Highway Impact

With regards to highway safety and concerns with regards to public transport and active travel provision in the locality, the site is in an area served by bus Public Transport. There is a northbound and southbound bus stop within 400m of the site. The design of the site must prioritise connections to public transport as set out in Policy S8 and Policy HA14 criterion (d). A financial contribution towards improved connections to public transport may be required which will be given further consideration at the planning application stage.

A Transport Statement (Lime Transport, August 2021) has been submitted to support the allocation. This concluded that given the small scale nature of the site, the impact of the development traffic on the local network would be negligible and that safe and suitable vehicle access can be provided via Churchfields, along with design improvements to Churchfields. Further analysis and consideration of the vehicular access/junction design, footways, street lighting, crossing provision and pedestrian connection to existing public transport bus stops will be required at the planning application stage. These policy requirements are set out in Policy HA14 criterion (d).

Landscape Impact

In terms of landscape concerns, a Landscape briefing note (EDP, July 2021) has been submitted which reviewed the landscape and visual characteristics. Overall, the landscape note concludes that although development would change the character of the site itself, it would not be significantly detrimental to the surrounding landscape character when set against the immediate context of the recent Churchfields development. Future development of the site should be informed by a robust Landscape and Visual Impact Assessment, which should inform the masterplanning and detail design of the scheme. MCC's Landscape Officer considers the site from a landscape and GI perspective

	to be suitable for residential development. It is considered that with appropriate design and layout, with retention of existing boundaries the proposed development can be integrated effectively into the landscape as an urban extension. These high level landscape design requirements are set out in Policy S8 and Policy HA14 criteria (a) and (b) which ensure key views of the Wye Valley National Landscape (AONB) are respected and the site is integrated sensitively into existing landscape features. Collectively, these policies, along with policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity. <u>Biodiversity Impact</u> With regards to concerns raised in relation to loss of habitats, a Preliminary Ecological Appraisal (Soltys Brewster ecology, August,2021) has been submitted which has appraised the site for its ecological value. Of note, the site contains important mature hedgerows which contain several important natural ecological habitats. The protection and preservation of these habitats is a key consideration in the development of the site. MCC's ecologists note that there are no 'in principle' constraints to the future development of the site subject to implementation of a sensitive masterplan design that incorporates appropriate inherent avoidance, mitigation and enhancement measures. It is considered that net benefit for biodiversity can be achieved at the site and this requirement is set out in Policy S8 - Site Allocation Placemaking Principles, as well as Policy S5 and Policy NR1- Nature Recovery of the Plan. Further details will be provided at the planning application stage. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. <u>Wastewater Treatment Works</u> With reference to the capacity of the sewerage system, Dŵr Cymru Welsh Water (DCWW) have been consulted throughout the Plan preparation process and advised that a scheme to increase the capacity at the Devauden WwTW is scheduled to be undertaken by January 2027, and that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of this scheme.
HA15 – Land East of Little Mill	Comments received in relation to proposed site allocation HA15 – Land East of Little Mill, Little Mill were predominantly objections from private individuals. Many felt that Little Mill is not a sustainable location due to the lack of amenities and public transport and also raised concerns around drainage/flooding and sewerage capacity. Concerns were also raised in relation to building on greenfield land and the subsequent loss of green open space and harm to wildlife. The need for more housing in this area was questioned particularly with regard to the nearby development planned at Mamhilad. <u>Site Selection</u> The RLDP spatial strategy is set out in Policy S2 and reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny,

Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).

Little Mill is identified as a Main Rural Settlement, with a good range of facilities, including a community hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the Plan period to help sustain the community. The proposed site is in an area served by public transport. The A472 at the eastern edge of the site is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow). Route 23 (Stagecoach) stops on the A4042 within walking distance of Little Mill offering services between Pontypool and Abergavenny, and Pontypool & New Inn railway station is easily accessible from the site with frequent trains to Cardiff and Newport as well as routes to the north including Abergavenny and Hereford. As required by Policy HA15, financial contributions towards improved public transport and bus frequency will be required and considered at the planning application stage. Further information is provided in the Infrastructure Delivery Plan.

Need for housing / Affordable Homes

A core RLDP objective is to deliver much needed affordable homes to help address inequality in both urban and rural communities. We have the highest average house prices in Wales which means a large proportion of people cannot afford to buy a home so either leave the County or have to live with their parents or in shared housing for longer. Notwithstanding the development proposed nearby, in Torfaen, Monmouthshire has over 2,000 households identified as being in need of affordable housing. The proposed site will provide 10 affordable homes for local people.

Flood Risk and Drainage Considerations

Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Flood Map for Planning does not identify any flood zones on the site. With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Policy HA15 requires a scheme for the management of overland flows from adjacent land to ensure the potential flood risk from the land above the site is accommodated within the layout of the site. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW noted that the Little Mill WwTW currently has limited capacity to accommodate foul flows, and a Developer Impact Assessment may need to be undertaken on the WwTW which will conclude any reinforcement works required.

Landscape and Ecology Considerations

The proposal to allocate land for development has been made with regard to green infrastructure, landscape and nature recovery considerations. The site search sequence (as outlined in PPW12) prioritises previously developed land (brownfield) and if none is

	available (Monmouthshire has limited brownfield sites) then greenfield sites are to be considered. In response to ongoing dialogue with MCC, a reduced density and extent of development has evolved from the original submission, reducing the land area from 4.1ha to 1.68ha. Having regard to the Preliminary Ecological Appraisal (August 2021) submitted in support of the site, MCC Ecology section consider that the site is suitable for a residential allocation with appropriate mitigation and compensation measures and note that the technical constraint on development imposed by the characteristics and alignment of the high-voltage overhead electricity line provides an opportunity to provide habitat diversification and consequent ecological enhancement through provision of an area of public open space in the southern section of the site; further details will be required at the planning application stage. Policies HA15 and S8 establish high-level policy requirements in this respect. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Public Open Space The RLDP recognises the value and importance of placemaking and the provision of locally accessible open spaces for health and well-being and for recreation and, therefore, helps ensure the provision of public open space and recreation facilities are protected as well as requiring new development to make a contribution to the provision of additional/improved facilities. Accessible public open space will be a requirement of the development of the site, creating physical access to an area that currently only allows limited visual access. The amount of open space to be provided on site will be agreed at the planning application stage in accordance with the RLDP policy framework.
HA16 – Land North of Little Mill	The proposed allocation at Land north of Little Mill (Policy HA16) is a site that has been rolled forward from the adopted LDP. This site was granted planning permission on 17/09/2024 for the development of 15 homes (7 market, 8 affordable) under the reference DM/2020/01438.
HA17 – Land adjacent to Llanellen Court Farm, Llanellen	Comments received in relation to proposed site allocation HA17 – Land Adjacent to Llanellen Court Farm, Llanellen were predominantly objections from private individuals. Concerns centred around drainage, flooding, sewerage capacity and pollution risks to the River Usk SAC. Many felt that Llanellen is not a sustainable location due to impacts on highways, lack of public transport and active travel options, nearby amenities, healthcare, and education facilities. Concerns were raised about visual and residential amenity impacts. Other points raised included impacts on protected trees, ecology, landscape sensitivity, and the site's proximity to a nearby SINC. Additionally, loss of agricultural land, and the perceived incompatibility of affordable housing with the area's character were noted. Site Selection Land Adjacent to Llanellen Court Farm, has been allocated as one of Monmouthshire's rural housing allocations to assist in meeting the needs of Monmouthshire's rural communities. The RLDP spatial strategy is set out in Policy S2 and reflects the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. While the majority of growth is focused in the County's most sustainable settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside, some growth is directed to our

most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas (Objective 13 of the RLDP).

Llanellen is identified as a Main Rural Settlement, with a good range of facilities, including a village hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the Plan period to help sustain the community. The proposed site is in an area served by public transport, including bus route 23 (Hereford-Abergavenny-Pontypool-Cwmbran-Newport) providing sustainable links to the services and facilities in these settlements. As required by Policy HA17, financial contributions towards improved public transport will be required and considered at the planning application stage. Further information is provided in the Infrastructure Delivery Plan.

Agricultural Land

It is recognised that a proportion of the proposed allocation is located on Best and Most Versatile (BMV) agricultural land. When considering the site search sequence set out in national planning policy, it is noted that most of the land surrounding Llanellen is of BMV status. In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of BMV agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

Need for Housing / Affordable Homes

A core RLDP objective is to deliver much needed affordable homes to help address inequality in both urban and rural communities. The proposed site will provide 13 affordable homes for local people.

Highways Impact

A Transport Statement (December 2023) has been submitted to support the allocation. MCC Highways consider that the existing access off the A4042 is capable of accommodating the proposed trip movements associated with the proposed development. Further analysis and consideration of the vehicular access/junction design, footways, street lighting, crossing provision, pedestrian connection to existing public transport bus stops and links with the Monmouthshire Brecon Canal will be required at the planning application stage. These policy requirements are set out in Policy HA17 criterion (b).

Landscape, Green Infrastructure (GI) and Ecology Impact

The proposal to allocate land for development has been made with regard to green infrastructure, landscape, nature recovery and ecology considerations. The site search sequence (as outlined in PPW12) prioritises previously developed land (brownfield) and if none is available (Monmouthshire has limited brownfield sites) then greenfield sites are to be considered. In response to ongoing dialogue with MCC, a reduced density and extent of development has evolved from the original submission, reducing the land area from 3.39ha to 1.56ha. MCC's Landscape Officer considers the site from a landscape and GI perspective to be suitable for residential development in response to the submitted Landscape Visual Statement (December 2023). Having regard to the Ecological Assessment (December 2023) submitted in support of the site, MCC Ecologists consider that the site is suitable for a residential allocation with appropriate mitigation and

	compensation measures. Policies HA17 and S8 establish policy requirements in this respect. These policies, along with Policy S5 – Green Infrastructure, Landscape and Nature Recovery and its associated development management policies will enable the authority to address concerns of impact on landscape character and visual amenity. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. <u>Flood Risk / Drainage</u> Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The Strategic Flood Consequence High Level Assessment concludes that there is no significant flood risk to the allocation with 0% of the site within Zones 2 & 3 for Sea and Rivers and 2.57% of the site within Zones 2 & 3 Surface Water. MCC's Drainage Officer has assessed the information and confirmed that surface water drainage can be managed at the site. With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. <u>Wastewater Treatment Works (WwTW)</u> The Council has liaised with Dŵr Cymru Welsh Water (DCWW) throughout the preparation of the RLDP. In response to the Deposit Plan consultation, DCWW noted that the Llanellen WwTW has the biological capacity to accommodate the foul flows from this site. It has also been noted that NRW have completed the phosphorus permit review process and have confirmed that a backstop consent limit of 5mg/l is applicable from 15/02/2024 and this proposal would be accommodated within this limit.
HA18 – Land West of Redd Landes, Shirenewton	A significant number of representations were received concerning the proposed affordable housing-led site allocation at Land west of Redd Landes, Shirenewton (Policy HA18). Many commented on the size of the site and number of homes proposed, suggesting the site would be disproportionate and would overwhelm the village of Shirenewton. Concern was raised by some of the impact on protected species, habitats and the loss of agricultural land. The potential impact on the Shirenewton Conservation Area and landscape in general was noted. One of the key issues raised related to the lack of local amenities. It was noted that there are capacity issues at the local school and the public transport offer is limited. The impact of the site on the local road network was raised by many. The site's potential impact on the sewerage network in the local area was also of concern to many respondents. <u>Site selection</u>

In accordance with Planning Policy Wales (2024) housing land should be sited in sustainable locations. The site allocations included in the RLDP are located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Shirenewton is a Tier 3 settlement and identified as a Main Rural Settlement. The RLDP proposes a small number of allocations in Main Rural Settlements to deliver much needed affordable homes and address rural equality and rural isolation in these areas. While there is a preference for maximising opportunities for development on previously developed land, it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. Its allocation supports the RLDP's growth and spatial strategy and associated core objectives, including the delivery of affordable homes, and facilitates the delivery of a range and choice of sites within the Plan period.

In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. The proposed site allocation at Land West of Redd Landes, Shirenewton is a sustainable edge of settlement site, located opposite the recreation ground, play area and recreation hall and offers an opportunity to link to wider public rights of way that connect to the primary school and other parts of the village.

Ecological Impact

With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. Any mitigation and compensation required will be agreed with MCC Ecology at the detailed planning application stage.

Policy HA18 includes criterion a) which notes that the existing boundary features will be enhanced with additional hedgerow and tree planting to boundaries to mitigate the development of the site and respond to its edge of settlement location. The RLDP includes a specific policy LC5 relating to dark skies and lighting that must be considered as part of a detailed planning application. Further ecological surveys will also be undertaken at the planning application stage. Any light and noise impact will be assessed as part of the planning application process.

Agricultural Land

It is recognised that the proposed allocation is located on Best and Most Versatile (BMV) agricultural land. When considering the site search sequence set out in national planning policy, it is noted that most of the land surrounding Shirenewton is of BMV status.

In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of BMV agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.

Impact on heritage/landscape

The proposed site has been reduced in scale from the original area submitted. The reduced site area proposes a suitable extension to Shirenewton without detriment to the setting of the Conservation Area as this maintains a larger buffer area and preserves its setting. Glamorgan Gwent Archaeological Trust have noted a desk-based assessment and geophysical survey is required, prior to the determination of a planning application which would inform mitigation opportunities. This may include further pre-determination work.

Strategic Policy S8 and Policy HA18 along with Policy S5 and supporting DM policies, including LC1- Landscape Character, will appropriately enable the authority to address concerns of impact on landscape character and visual amenity. Policy HA18 includes criterion a) which notes that the existing boundary features will be enhanced with additional hedgerow and tree planting to boundaries to minimise any potential landscape impact on the wider surroundings and respond to its edge of settlement location. Full consideration of design and landscaping in order to successfully integrate the proposals will be considered at the planning application stage.

Infrastructure

Planning Policy Wales (2024) notes that where new housing is proposed, developers will be expected to provide community benefits which are reasonably related in scale and location to the development, taking account of viability ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, the site-specific infrastructure requirements of the allocated sites are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites and is included within Appendix 8 of the RLDP. The IDP has been informed by, and emerged in liaison with, both internal and external stakeholders responsible for the provision of infrastructure across the County in order to ensure that stakeholders are engaged in the provision and planning of the infrastructure required to support the Deposit Plan allocations and strategy. This includes consideration of education requirements. MCC education advised that there is currently capacity in secondary schools within the locality. With regard to primary education, there are capacity issues in some year groups in the catchment primary school, however, the site will not provide a sufficient increase in children to warrant a need to increase capacity at the school. The latest position with education will be reviewed at the planning application stage.

With reference to public transport, the site is served by bus route 63 (Cwmbran-Pontypool-Usk-Chepstow), and consideration of the need for additional bus facilities to serve the site will be made at the planning application stage. The IDP sets out the requirement for financial contributions towards improved public transport and bus frequency.

Highways/Accessibility considerations

MCC Highways note the proposed site access off Earlswood Road is acceptable and the vehicular movements associated with the site will not have an adverse impact on the safety and capacity of the immediate highway network. Furthermore, Policy HA18 includes criterion e) relating to the provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages to and within the site. This includes a key connection to a footpath link on the eastern part of the site to the road frontage allowing ease of access to the recreation hall and grounds, and a new footway link to the north of the site to connect into an existing public right of way, which will allow for a more direct public access route to the primary school.

	<u>Flood Risk and Surface Water Run-Off considerations</u> The Flood Map for Planning does not identify any flood risk zones on the site. Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. <u>Dŵr Cymru Welsh Water</u> Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and previously raised no concern with Shirenewton, noting there were no issues with either water supply or foul flows. At the Deposit Plan consultation stage, DCWW revised their comments to note a Hydraulic Modelling Assessment (HMA) may be required as it has since become apparent that there are some on-going issues along the sewer network. A HMA to determine that HA18 Land west of Redd Landes does not exacerbate the existing situation is therefore required, or as an alternative removal of surface water to offset foul flows could be utilised. This type of information would not, however, be required until the planning application stage. The site promoters are aware of the need to ensure early communication with DCWW on these matters.
S9 – Land at Bradbury Farm, Crick	As noted above in relation to the Gypsy and Traveller policy topic area, objections were raised in relation to the Gypsy and Traveller allocation at Bradbury Farm, Crick for 7 pitches. Concerns primarily focussed on the suitability of the site due to issues such as noise and highways impact, access to services, proximity to the settlement community and the disproportionate number of Gypsy and Traveller sites located in the south of the County. Operational issues such as management, allocation of pitches and rental/council tax payments were also raised as concerns. Planning Policy Wales (PPW) requires local authorities to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need (4.2.36). Site investigation surveys including air quality, transport, ecology, land contamination and noise surveys have been undertaken to inform the site identification process. The survey findings were considered at the Cabinet meeting of the 21st August 2024 which approved the inclusion of Land at Bradbury Farm, Crick as an allocation in the Deposit RLDP. Further survey work will be undertaken as necessary at the planning application stage. Further guidance is set out in Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Site. This notes at paragraph 38 that ‘in deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services.’ In this respect, the proposed allocation at Bradbury Farm and its proximity to residential areas is considered to be in accordance with national planning policy guidance and offers opportunities to masterplan the site as part of the wider proposals in the area. Welsh Government has a commitment to ensure a wide choice of accommodation is available and ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers, to have equal access to culturally appropriate accommodation as all

	other members of the community. With regard to existing Gypsy and Traveller sites in the County, each site is considered against the relevant policy framework and assessed on its own merits. Site management arrangements for the proposed allocation are still under consideration; however, pitch allocation arrangements will operate in a similar fashion to the housing register whereby families register their interest to be allocated a pitch or pitches.
EA1a – Land at Nantgavenny Business Park, Abergavenny	Responses received in relation to employment allocation EA1a – Land at Nantgavenny Business Park, Abergavenny were predominantly from private individuals including a petition signed by 14 residents. Concerns raised related to the need for additional employment land and the impact on residential amenity. The loss of a greenfield site and impact on surface water run-off was also of concern. Highways concerns focussed on the ability of Nantgavenny Lane to cope with additional traffic. The ecological impact of the proposed allocation on the site itself and River Gavenny SINC corridor has also been raised. <u>Need for the Employment Allocation</u> In accordance with national planning policy, the RLDP is required to make provision for employment land requirements for the Plan period up to 2033. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (ELR) (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0266 – Land at Nantgavenny Business Park, would make a logical extension to the existing industrial estate, with the mix of uses similar to the existing. It noted that demand is likely to be from small to medium enterprises (SMEs), the provision of which would be consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS). The EESS, which sets out the Council’s direction of travel and action plan for delivering job growth, recognises the importance of SMEs to Monmouthshire’s economy and their contribution to providing a high degree of resilience to the local economy. Furthermore, the proposed allocation provides much needed employment provision in Abergavenny, which is recognised as being a primary settlement in the settlement hierarchy. Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. However, Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire’s core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework.

	The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised above, whilst also providing additional homes and opportunities for economic growth. <u>Impact on Residential Amenity</u> Consistent with the adjoining employment site, the RLDP allocates land at Nantgavenny Business Park for B1 uses. The Town and Country Planning (Use Classes) Order 1987 (as amended) categorises B1 uses as offices (other than those that fall within A2), research and development of products and processes and light industry appropriate in a residential area. Furthermore, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution. <u>Ecological Impacts</u> There are no ecological designations on site, however, its proximity to the River Gavenny SINC is noted. MCC Ecology consider the site to be suitable for development with the incorporation of appropriate mitigation measures, such as the inclusion of a buffer to with the adjoining SINC and retention of priority hedgerows. Further layout details will be assessed as part of a planning application. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales, including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery. <u>Highways Impact</u> Access to the site is proposed through the existing private industrial estate road which can be extended to accommodate the proposed development. Comments relating to the constraints associated with Nantgavenny Lane, are noted, and an updated Transport Assessment will be required as part of the planning application process and will be required to consider the capacity on Nantgavenny Lane and the Nantgavenny Lane / Hereford Road junction. <u>Surface Water Run-Off</u> With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.
EA1b – Poultry Units, Rockfield Road, Monmouth	The proposed B1 employment allocation at the Poultry Units, Rockfield Road, Monmouth (EA1b) did not receive any objections. It was recognised that the employment designations do not allow for uses outside of the B use classes, however, it was suggested that the site could also support an element of D1 use to make it a more flexible allocation.

	An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Poultry Units, Rockfield Road, Monmouth (Policy EA1b) for a B1 use. The proposed allocation provides much needed employment provision in Monmouth, which is recognised as being a primary settlement in the settlement hierarchy. The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy. While it is recognised that D1 uses can be employment generating the purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, the Council would not support a mixed B1/D1 use on this site.
EA1c – Land North of Wonastow Road, Monmouth	There were limited responses on the proposed employment allocation Land North of Wonastow Road, Monmouth (EA1c), for B1.B2 and B8 uses. Overall, there was general support for the allocation. Some comments proposed alternative uses on the site in addition to employment, including a care home and housing. An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Land north of Wonastow Road, Monmouth (Policy EA1c) for B1, B2 and B8 uses. The proposed allocation provides much needed employment provision in Monmouth, which is recognised as being a primary settlement in the settlement hierarchy. The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0274 – Land north of Wonastow Road, Monmouth, is attractive for employment and would likely host several industrial units smaller than the neighbouring Siltbuster and Tri-Wall site. The provision of such industrial units would be consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy. It is recognised that a care home use can be employment generating, however, the Council would not support a care home use on this site. The purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, this site will continue to be allocated for an employment use only.

EA1d/W3c – Newhouse Industrial Estate, Chepstow	The proposed allocation at Newhouse Industrial Estate, Chepstow for 2.5ha of employment land received few responses, none of which were objections to the employment allocation. There was general support for employment uses in this location and a general comment that lighting and pollution impacts will need to be considered in relation to Mathern. In response to residential amenity concerns upon Mathen Village, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regards to amenity issues including air pollution, light pollution and noise pollution, and will be considered at the planning application stage.
EA1e/W3f – Land adjoining Oak Grove Farm, Caldicot	A limited number of responses were received in relation Land adjoining Oak Grove Farm, Caldicot (EA1e/W3f). Limited comments were raised and related to the type of development proposed and whether the site has mains drainage, noting that the site is located within the Source Protection Zone. It was suggested the site was too small and would be better located closer to existing employment sites. An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes Land adjoining Oak Grove Farm, Caldicot (Policy EA1e) for B1, B2 and B8 uses. The proposed allocation provides much needed employment provision in Caldicot, which is recognised as being a primary settlement in the settlement hierarchy. Any uses on the site would be subject to a planning application and considered on a case-by-case basis subject to detailed planning considerations and, must be in accordance with the Plan’s policy framework as a whole. The site has also been identified as a potential waste management site under Policy W3 (W3f). While the site has potential for such a use this would be subject to detailed planning considerations. Regarding the site’s location in a Source Protection Zone (SPZ). In their response to the Deposit Plan Natural Resources Wales (NRW) note that in areas of non-mains drainage inside this SPZ, all sewage effluent discharges to ground must have an environmental permit and proposals will be considered based on a risk assessment and the appropriateness of the discharge with respect to the local environmental setting. Any development proposals within the SPZ must be able to demonstrate that the proposal complies with NRW groundwater protection policy and that no contamination of the water supply will result from the development proposal. This will be considered further through the planning application process. The site relates to 6ha which is not considered to be too small to be a standalone employment site. The site benefits from good access direct onto the A48 along with access to existing public transport.
EA1f/W3d – Quay Point, Magor	The allocation Quay Point Magor for 14ha of employment land received several representations, whereby there were concerns to the site’s allocation in terms of environmental impact upon the adjacent Site of Special Scientific Interest (SSSI) Gwent levels and Historic Gwent Levels landscape character and Scheduled Ancient Monument (SAM) Wilcrick Hill , alongside concerns in relation to the impact of the allocation on the setting of Llandeenny and nearby residential properties amenity in terms of visual, noise and light pollution.

Principle of the Site Allocation

In response to these concerns raised, the site has previously been identified as an employment site within Monmouthshire, allocation SAE1b in the current adopted LDP. Although it is recognised that the site is greenfield and located in close proximity to the SSSI designation, it is considered that on planning balance the employment allocation is of strategic importance to ensure the continued support for employment growth and economic benefit in the area.

An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of employment land required for the Plan period to 2033 and the sites to allocate. The ELR confirmed that land at Quay Point, Magor would be suitable for employment uses, reflecting its strategic location in the County, positioned along the M4 corridor, and given that Magor Brewery is one of the County's main employers.

SSSI and Gwent Levels Historic Landscape Considerations

In terms of the impact upon the SSSI and Gwent Levels Historic landscape, a Preliminary Ecological Appraisal has been submitted which has appraised the site for its ecological value. This has been reviewed by MCC ecologists, who consider the site is suitable for allocation with appropriate mitigation and compensation, which includes further ecological survey work to ensure retention of all priority habitat and connectivity and an appropriately size buffer area at southern section of site to limit impacts on SSSI. Full details will be required at the planning application stage. RLDP proposals will also be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Cadw have provided comments as part of the Candidate Site Assessment Process and do not object to the allocation's impact on the SAM at Wilcrick Hill due to the distance and intervening buildings between the site location and SAM.

The RLDP provides the planning policy framework to ensure the impact on the environment and landscape is fully considered when assessing proposed developments at planning application stage, with reference to Policy S5 – Green Infrastructure, Landscape Nature Recovery, LC1 Landscape Character, NR1 Nature Recovery and Geodiversity and NR3 Protection of Water Sources and the Water Environment. Separate requirements and tools under other legislation, if required, such as The Environment Act (Wales) 2016 Section 6 Duty and PPW12 will also help to ensure development has an acceptable impact upon environmental considerations. There will also be further full consultation at the planning application stage with other regulatory environmental bodies, including NRW and Cadw.

Amenity Impact

With regard to residential amenity concerns, proposals are required to satisfy Policy PM2 – Environmental Amenity, which assesses proposals with regard to amenity issues including air pollution, light pollution and noise pollution, and will be considered at the planning application stage.

EA1g – Rockfield Farm, Undy	The proposed allocation at Rockfield Farm, Undy for 3.2ha of employment land received just one response from statutory consultee Dŵr Cymru Welsh Water (DCWW), confirming the site is in the catchment of the Nash Wastewater Treatment Works (WwTW). This site forms part of the mixed used strategic site allocated (SAH5) of the current adopted LDP, which was granted outline planning permission 20.03.20218 (DC/2016/00883). There is a current planning application for provision of 5,575m² of B1 employment use on the land which is pending a decision.
EA1h/W3e – Gwent Euro Park, Magor	A limited number of representations were received in relation to employment allocation Gwent Euro Park Magor for 7ha, whereby there were concerns to the site's allocation in terms of environmental impact upon its location within the Site of Special Scientific Interest (SSSI), Gwent levels and Historic Gwent Levels landscape character, alongside concerns in relation to the impact of the allocation on the setting of Llandeenny and nearby residential properties amenity in terms of visual, noise and light pollution. The site has previously been identified as an employment site within Monmouthshire, allocation SAE1c in the current adopted LDP. Although it is recognised that the site is within the Historic Gwent Levels and SSSI designation, this site has extant planning permission meaning that development could lawfully commence on the site without the need to apply for future planning permission. This is considered to be an exceptional circumstance in this context. Moreover, immediately adjacent land, which lies within Newport City Council's jurisdiction, and which forms part of the extant planning permission, is currently being developed for employment use. Given the site's strategic location and the extant fallback permission, together with evidence to demonstrate that the site can be delivered (i.e. submission of a current planning application DM/2025/00852), it is considered appropriate to reallocate the site in the RLDP. The site will make a significant contribution to the RLDPs employment land provision, reflected in Policy S1 and Policy S10. As part of the current planning application DM/2025/00852 relating to the adopted LDP allocation, the applicant has provided up-to date survey work including updated FCA which will need to meet the current TAN15 National flooding policy, drainage plans, ecological and landscape assessments, environmental health and transport assessments, which will be assessed as part of this process.
EA1i/W3a – Raglan Enterprise Park	A limited number of representations were received in relation to employment allocation EA1i – Raglan Enterprise Park. Concern was raised that the site allocation is outside of the settlement boundary and would result in the loss of high-quality agricultural land. Comments relating to the proposed renewable energy generation allocation are discussed in relation to Policy CC2 – Renewable Energy Allocation. Both the Protected Employment site and proposed Employment Allocation at Raglan Enterprise Park are located outside of the settlement boundary. This is consistent with the approach taken in relation to Raglan Enterprise Park employment allocation in the Adopted Local Development Plan and reflects the strong functional link the employment site has with Raglan but also recognising the distance between the industrial units and urban form. The proposed allocation Raglan Enterprise Park is considered to be a logical extension to the existing employment provision at the site. Furthermore, the Employment Land Review (Nov 2022) considers the appropriateness of the candidate sites put forward for allocation for employment use and concludes that land promoted under Candidate Site CS0069 – Land at Raglan Enterprise Park, could provide small-scale units for local needs within the northern part of the County. This would be consistent with the objectives of the Council's Economy, Employment and Skills Strategy (EESS), which recognises the importance of SMEs to Monmouthshire's economy and their contribution to providing a high degree of resilience to the local economy.

	A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.
EA1j/W3b – Land West of Raglan	Comments received in relation to employment allocation EA1j – Land West of Raglan, question the need for the allocation. It was noted that it is unjustified and would result in the loss of high-quality agricultural land. Concerns were raised that it would result in a visually prominent site, resulting in an unacceptable impact on the landscape and Raglan’s historic environment, including Raglan Castle and Raglan Conservation Area. Other concerns related to the highways impact of the proposal and surface water run-off implications. <u>Need for the Allocation/Loss of High-Quality Agricultural Land</u> In accordance with national planning policy, the RLDP is required to make provision for employment land requirements for the Plan period up to 2033. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (ELR) (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The ELR also considers the appropriateness of the candidate sites put forward for allocation for employment use and concluded that land promoted under candidate site CS0278 – Land West of Raglan, would be suitable for employment uses, reflecting its strategic location in the County, positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth/Hereford and south towards Newport/Cardiff and Bristol, hence the promotion of such uses via the candidate site process. Having regard to the findings of the ELR and the site selection process which has had full regard to development constraints, the proposed site allocation is considered to be appropriate and will contribute to meeting Monmouthshire’s economic growth objectives. The allocation is also consistent with the objectives of the Council’s Economy, Employment and Skills Strategy (EESS), which sets out the Council’s direction of travel and action plan for delivering job growth. A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for

allocations involving BMV land and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.

Landscape Impact

The allocation proposes a reduced site area to that submitted as part of the candidate site process reflecting the ongoing dialogue between the Council and the site promoters. The location of the reduced site area integrates the proposed employment allocation more sensitively into the landscape with an existing line of mature trees on the eastern verge to the proposed allocation affording an existing element of visual screening. However, it is noted that required visibility splays will have an impact on this. The integration of an appropriate buffer and green infrastructure provision will be a key requirement of the site's development as required by Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recover. Similarly, the use of materials and colours to reflect the setting will be required in accordance with policy PM1 – Creating Well-designed Places. Further placemaking principles will be determined at the planning application stage.

Impact on Historic Environment

MCC's Heritage Officer has advised that key vistas and sightlines will be maintained allowing Raglan Castle to remain as a key landmark. This will maintain the integrity of the Conservation Area and the setting of the Castle. Through the integration of placemaking principles and enhanced green infrastructure and other policy requirements set out in the RLDP, the proposed allocation is not considered to detrimentally harm the setting of the Castle or wider views.

Ecological Impact

There are no ecological designations on site, and MCC Ecology consider the site to be suitable for development with the incorporation of appropriate mitigation measures, such as the inclusion of a buffer between development and the watercourse. Further layout details will be assessed as part of a planning application. RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity. Section 10 of the RLDP provides further details relating to achieving ecological improvements as well the RLDP policy framework, with particular reference to Policy NR1 – Nature Recovery.

Surface Water Run-Off

With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.

Highways Impact

Having regard to Transport Statement prepared in support of the proposed site allocation, MCC Highways consider both the proposed site access onto Usk Road and the traffic generation and distribution to be acceptable in principle. Further detailed analysis will be required as part of a planning application submission.

EA1k – Land to the East of Abergavenny	As discussed in relation to Strategic Site Allocation HA1 – Land to the East of Abergavenny, comments relating to the employment element of the site raised concerns in relation to the level of employment provision, with suggestions made that this should be increased from 1ha of B1 use industrial land. The employment provision made within the strategic allocation under policies HA1 and EA1k – Land to the East of Abergavenny, is an integral element of the proposed mixed-use element of the allocation located at the western end of the site, opposite the train station, and as such has potential to serve both the development site and the wider Abergavenny area. The scale of provision reflects a balance between the creation of a sustainable community through the incorporation of a mixture of uses and an acknowledgement of the level of B1 Use Class provision that is needed to contribute to the overall employment land requirement over the Plan period. The Town and Country Planning (Use Classes) Order 1987 (as amended) classifies B1 Business Use Class as being offices, research and development of products and processes, light industry appropriate in a residential area. The employment allocations have been informed by the Employment Land Review (Nov 2022), which recognises the important contribution B1 uses make to the local economy but concludes that B2 (general industrial) and B8 (storage and distribution) uses make up the majority of the employment requirement, which would not be appropriate in the context of the proposed residential-led, mixed-use allocation. In this respect, additional land for B1 use classes is not considered to be required as part of this site. It should be noted, however, that the proposal also incorporates a neighbourhood centre which could also generate employment opportunities in non-B Use Class industries.
EA1l – Land at Former MOD Site, Caerwent	A limited number of comments were received on this allocation, as most were directed to the mixed-use housing allocation (Policy HA9). It was raised by the site promoter, however, that the allocation should not just be allocated for a restricted B1 employment use, but for a wider/flexible designation which allows a mix of B1 and C2 (care-home) uses. In response to this objection, it is considered that the proposed allocation provides much needed employment provision in Severnside. The RLDP employment allocations ensure that sufficient employment sites are suitably located in attractive, accessible and sustainable locations and are of an appropriate size and type to meet the needs of businesses, including, through support of start-up and growing businesses to help diversify the economy. While it is recognised that a care home use can be employment generating, the purpose of this designation is to bring forward sufficient land to enable the growth of the B use class sector. As a consequence, the Council would not support a care home use on this site.
EA1m – Land to the East of Caldicot/North of Portskewett	A limited number of comments were received in relation to EA1m specifically, EA1m forms part of the Land to the East of Caldicot/North of Portskewett mixed-use allocation (Policy HA2). It was questioned whether there was demand for employment land from businesses in the area. It was also suggested that flexibility should be applied to any employment including in relation to the location, the location shown in the indicative masterplan was objected to stating this was not appropriate and should therefore be amended. An Employment Land Review (ELR) has been undertaken in accordance with Planning Policy Wales (2024) (PPW) which recommended a minimum requirement of 38ha of employment land over the Plan period. Accordingly, Strategic Policy S12 sets out the requirement to provide for a suitable range and choice of sites for industrial and business development in the County (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987). Policy EA1 identifies these sites and includes HA2/EA1m for 1ha of B1 uses.

	Use Class B1 relates to business use and includes office use (other than those within Class A2), research and development and light industry (where any process can be carried out in a residential area without causing detriment to the amenity of the area). Any uses on the site would, nevertheless, be subject to a planning application and considered on a case-by-case basis subject to detailed planning considerations and, must be in accordance with the Plan's policy framework as a whole. Regarding the indicative masterplan, while it is recognised that further dialogue regarding the masterplanning of the site has taken place with the site promoters since the Deposit RLDP consultation, the masterplan set out in the Plan is indicative only and was considered to be a helpful aide to the consultation process by providing a visual interpretation of the site's broad parameters, policy requirements and proposed uses. Policy HA2 clearly states that a masterplan will be agreed with the Local Planning Authority prior to the determination of any planning application. The masterplan will be updated through the planning application process and will, therefore, be subject to further changes/iterations. It is not, therefore, considered necessary to amend the indicative masterplan. A summary of the comments made in relation to Land to the East of Caldicot/North of Portskewett (Policy HA2) is provided in the relevant section of the Report.
W3g – Existing Waste Facility – Five Lanes, Caerwent	No comments were received in relation to this allocation.
W3h – Existing Llanfoist Civic and Transfer Station	National Grid Energy Distribution (NGED) advised that the existing Llanfoist Civic and Transfer Station is crossed or in close proximity to a National Grid asset. The waste allocation identified under allocation W3h – Existing Llanfoist Civic Centre and Transfer Station, is a functioning waste facility in the County. The position of the power line and provided guidance will be considered should any planning applications be submitted for additional facilities at the site.

Appendix 1: RLDP Key Stages in Chronological Order

RLDP Stage	Timescales / Details
Delivery Agreement	19 th March 2018- Approved by Council for consultation for a four-week period from 21 st March to 18 th April 2018. Report of Consultation reported to Council on 10 th May 2018. The DA was subsequently agreed with Welsh Government on 14 th May 2018.
Initial Call for Candidate Sites	An Initial call for Candidate Sites took place for a sixteen-week period from 30 th July to 19 th November 2018.
Sustainability Appraisal Scoping Report 2019	Endorsed for targeted consultation at Individual Cabinet Member meeting of 16 th January 2019. The draft SA Scoping Report was issued for a five-week period of consultation with statutory SEA consultation bodies (i.e. Natural Resources Wales (NRW) and Cadw) from 26 th October to 30 th November 2018. The post consultation report was agreed on 16 th January 2019 by Individual Cabinet Member.
Habitats Regulations Screening Report 2019	Endorsed for targeted consultation at Individual Cabinet Member meeting of 16 th January 2019. The draft HRA Initial Screening Report were issued for a five-week period of consultation with statutory SEA consultation bodies (i.e. Natural Resources Wales (NRW) and Cadw) from 26 th October to 30 th November 2018. The post consultation report was agreed on 16 th January 2019 by Individual Cabinet Member.
Issues and Vision Report 2019	Non-Statutory consultation with Members and through Area Committee and Cluster meetings during January 2019, and Economy & Development Select Committee on 14 th February 2019. A summary of the feedback received, together with the Council's draft response was reported to Cabinet on 5 th June 2019. The Issues, Vision and Objectives Paper was endorsed by Cabinet on 5 th June 2019.
Issues, Vision and Objectives (July 2019)	Updated to reflect the Council's declaration of a climate emergency in May 2019 and set out the links between RLDP objectives and the Monmouthshire PSB Well-being Plan objectives. Reported and endorsed by Cabinet on 3 rd July 2019.

Growth and Spatial Options 2019 (July 2019)	Endorsed for non-statutory consultation for a four-week period from 8 th July 2019 to 5 th August 2019 by Cabinet on 3 rd July 2019.
Delivery Agreement First Revision (March 2020)	The Revised Delivery Agreement was approved by Council on 5 th March 2020, agreed by Welsh Government on 6 th March 2020 and published on the 9 th March 2020. The DA was amended to reflect the delays incurred up to the Preferred Strategy stage as a result of the pre-election period preceding the December 2019 General Election, the additional time and work needed to inform the Preferred Strategy and delays associated with joint working with neighbouring local authorities on joint evidence base work.
Issues, Vision and Objectives (March 2020)	Amendment of Vision to include the spatial element associated with the 2020 Preferred Strategy.
Preferred Strategy (2020) with Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment	The Preferred Strategy, Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment were endorsed for statutory public consultation for a six-week period between 9 th March 2020 and 22 nd April 2020 by Council on 6 th March 2020.
Second Call for Candidate Sites	On 6 th March 2020, Council agreed a Second Call for Candidate Sites to take place over a twelve-week period from 9 th March – 3 rd June 2020.
Notice of amendment to Preferred Strategy and Second Call for Candidate Sites	On 18 th March 2020, notification was given of the postponement of the RLDP community engagement events and attendance at Community Council Clusters and Area Committees due to Covid-19. Consultees were advised that the consultation period and opportunity to submit candidate sites remained open, but the deadline for both would be extended accordingly.
Notice of cessation of the RLDP Preferred Strategy Consultation and	Following advice from the Minister for Housing and Local Government, the decision was made to cease the RLDP Preferred Strategy consultation and Second Call for Candidate Sites on 20 th July 2020.

Second Call for Candidate Sites	
Delivery Agreement Second Revision (October 2020)	Updated to reflect unavoidable delays relating to the Covid-19 pandemic, the review of the Issues, Vision, Objectives and Evidence Base, and publication of 2018-based population projections. The Revised DA was reported to and agreed by Council on 22 nd October 2020. The CIS was also reviewed and adjusted in line with the Coronavirus Regulations (2020) and Ministerial advice to reflect social distancing and other measures. The revised DA was agreed with the Welsh Government on the 30 th October 2020.
Issues, Vision and Objectives (October 2020)	A review was undertaken in June 2020 and again in July 2020 following the publication of a letter from the Minister of Housing and Local Government (7th July 2020) to ensure that the Issues, Vision and Objectives remained relevant and appropriate in light of the Covid-19 pandemic. In both cases it was considered that the RLDP Issues, Vision and Objectives remain relevant to Monmouthshire and that the RLDP strategy remained appropriate to address and deliver them. Furthermore, a number of issues and objectives were considered to have increased in emphasis and importance following the Covid-19 pandemic. This position was agreed by Cabinet on 17 th June 2020 and Council on 22 nd October 2020.
Growth and Spatial Options Paper December 2020	The revisited Growth and Spatial Options Paper was endorsed for non-statutory public consultation at the Cabinet meeting on 16th December 2020. The consultation took place over a 4-week period between January and February 2021.
Preferred Strategy (June 2021) with Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment	The Council endorsed the Preferred Strategy and associated documents for statutory consultation for an eight-week period from 5 th July – 31 st August 2021, at its meeting of 24 th June 2021.
Second Call for Candidate Sites (June 2021)	Council approved a Second Call for Candidate sites on 24 th June 2021. This took place alongside the Preferred Strategy

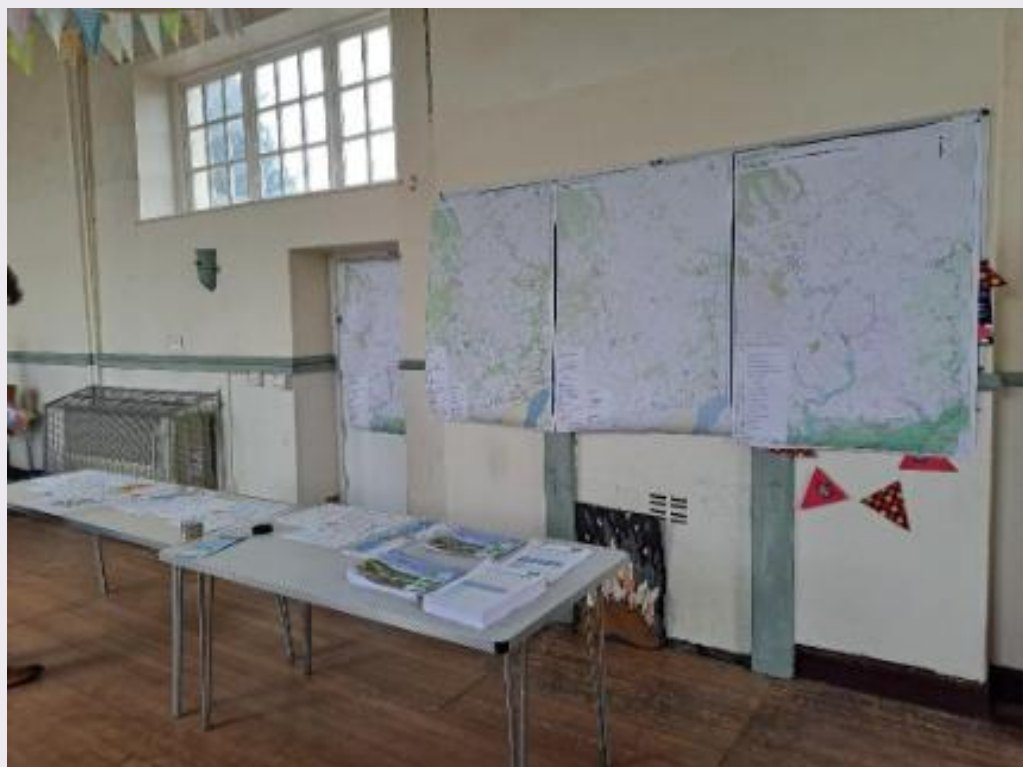
	consultation for an eight-week period from 5 th July to 31 st August 2021.
RLDP Update and Candidate Site Register Publication Notification (February 2022)	On the 10 th February 2022, an informative email/letter was sent to stakeholders on the RLDP consultation database, notifying of the publication of the Candidate Site Register on the Council's website and to provide an update on the RLDP. The email/letter informed stakeholders that the Council was considering the implications of the Welsh Government Planning Division's proposed prescribed maximum growth level on the RLDP's objectives. It advised that a future report to Council in late summer 2022 would present options for progressing the RLDP and would seek a Council decision on how to proceed.
RLDP Options Report (September 2022)	Report seeking endorsement of the proposed way of progressing the RLDP agreed by Council on 27 th September 2022. The RLDP Options Report invited Council to agree a proposed way forward, with a recommendation to Council that the best option to proceed is to progress with an amended growth and spatial strategy that responds to the challenges that had arisen to this point.
Delivery Agreement Third Revision (December 2022)	Updated to reflect revised timescales following the decision to embark on a new Preferred Strategy following an objection from Welsh Government to the July 2021 Preferred Strategy, and phosphate water quality issues in the River Wye and River Usk Catchment areas. The Revised DA was endorsed by Council on 1 st December 2022 and agreed with Welsh Government on the 2 nd December 2022.
Issues, Vision and Objectives (December 2022)	Minor updates made in December 2022, as part of the Preferred Strategy consultation that took place in December 2022.
Preferred Strategy (December 2022) with Initial Integrated Sustainability Appraisal Report and Habitats	The revised Preferred Strategy and associated documents were endorsed by Council on 1 st December 2022 for statutory consultation for an eight-week period from 5 th December 2022 – 30 th January 2023.

Regulations Assessment	
Candidate Site Register (December 2022)	The Candidate Site Register was endorsed by Council on 1 st December 2022 for statutory consultation for an eight-week period from 5 th December 2022 – 30 th January 2023.
Phosphate Briefing Note July 2023	July 2023 – Phosphates Briefing Update sent out to all stakeholders on the RLDP consultation database providing an update on the water quality issues affecting the River Wye and River Usk. The email advised that following the removal of the constraint on the Monmouth WWTW, it was proposed that the Deposit Plan would identify a new strategic site allocation for approximately 250-300 homes and include three 'roll-over' sites in the settlement of Monmouth. Updates to the Candidate Sites Register to reconsider sites previously filtered out due to the phosphates issue and the addition of a new candidate site submitted at the 2022 Preferred Strategy stage were also noted. A Scrutiny workshop open to all Members was also held on 12th July 2023 to discuss the briefing update.
Preferred Strategy Post Consultation Update to Council (October 2023)	In October 2023, in accordance with the Delivery Agreement a non-statutory report was taken to Council to seek endorsement of a small number of key post-consultation updates to the Preferred Strategy as a basis for the preparation of the Deposit Plan. Council agreed these changes which formed the basis of the preparation of the Deposit Plan.
Delivery Agreement Fourth Revision (October 2024)	Updated to reflect impacts on the publication of the Deposit RLDP due to the timing of a UK General Election. The Revised DA was agreed by Council on 24 th October 2024 and agreed with the Welsh Government on 25 th October 2024.
Issues, Vision and Objectives (September 2024)	Minor updates undertaken as part of the preparation of the Deposit Plan.
Deposit Plan with Integrated Sustainability Appraisal Report and Habitats	Council endorsed the Deposit Plan and associated documents on 24 th October 2024, for statutory public consultation for a six-week period between 4th November and 16 th December 2024.

Regulations Assessment (October 2024)	
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Appendix 2: Selection ‘Drop-in’ Session Photos

Raglan Drop-in Event Old Church School Community Centre – 12th November 2024



Abergavenny Drop-in Event Market Hall – 14th November 2024



Chepstow Drop-in Event Palmer Centre – 21st November 2024



Monmouth Drop-in Event Shire Hall – 25th November 2024



Appendix 3: School Consultation Feedback

During the school engagement sessions at Caldicot and Chepstow Comprehensive Schools, a presentation was given by the Council's Head of Placemaking and Planning Policy Officers. This covered a range of points, including the geography of Monmouthshire and the scope and purpose of the RLDP.

The pupils were asked what challenges and issues Monmouthshire has and how they think the RLDP can address them. Pupils were also asked whether they would like to live in Monmouthshire when they are adults.

Key Issues Feedback

Pupils in the sessions thought some of key issues Monmouthshire faced were:

- Traffic
- Empty shops
- Pollution
- Unemployment
- Homelessness

Some pupils thought new houses were needed for people without homes and to meet the need of Monmouthshire's older population, but traffic and infrastructure problems needed to be addressed before new houses were built. The number of empty shops was also raised as a key issue by the pupils.

There was a mixed response on whether pupils wanted to live within Monmouthshire in the future, with some wanting to stay as it's their home/where they are from, with others wanting to live somewhere else as they considered that 'there is not much' for young people to do in Monmouthshire. Some would like to return to Monmouthshire to settle later in life (after moving to cities, such as London and Bristol) for a number of reasons, including good schools and to be near to family.

Site Specific Feedback

The presentations were tailored to the different local areas, whereby within Chepstow Comprehensive School, the discussion focussed on a masterplan design exercise relating to the proposed site allocation at Land at Mounton Road, Chepstow, and within Caldicot Comprehensive School, the discussion and masterplan design exercise focussed on the proposed site allocation at Land to the East of Caldicot/North of Portskewett.

HA3 – Land at Mounton Road, Chepstow: Chepstow pupils thought that Land at Mounton Road was not the right area to develop, as it would make the area very busy, increasing traffic congestion in the locality and that Chepstow is becoming a suburb of Bristol. Pupils also noted that the proposed allocation would affect the view of Chepstow and that the natural landscape would be spoilt. They did, however, recognise the need for affordable housing and suggested that the proposed care home would be a good idea for Monmouthshire's ageing population and that a hotel would be good addition because of the Racecourse nearby.

HA2 – Land to the East of Caldicot/North of Portskewett: In the Caldicot session, which focussed on the proposed site allocation Land to the East of Caldicot/North of Portskewett, pupils thought that affordable homes was a good idea. The inclusion of a new primary school was also welcomed as they noted that building more houses would mean more schools are required. However, some thought that there were too many houses proposed, which could lead to overcrowding and destroy the open space between Caldicot and Portskewett. Concerns were also raised in relation to the loss of the land which they considered to be

aesthetically pleasing. Views were expressed that the construction of homes would affect this negatively and be a threat to nature and wildlife and also cause flooding. Others considered that the proposed development would impact on local service such as doctors, making it difficult to book appointments and new housing would impact on the roads and cause traffic congestion. It was also thought that people working in Bristol would move to the local area.

Appendix 4: Business Engagement Event Feedback

Deposit RLDP Consultation- Business Engagement Event 06.12.2024

A range of businesses representatives from across Monmouthshire were invited to the Deposit RLDP engagement event. A total of 7 business representatives attended the event, along with the Cabinet Member for Planning and Economic Development and Deputy Leader, an official from Welsh Government's Economic Development Division and representatives from the Council's Planning, Estates and Economy, Employment and Skills Teams.

A presentation was given by the Council's Head of Placemaking, focusing on the Deposit RLDP's proposed site allocations and economy/employment policy framework. A range of issues were raised and discussed, including in relation to the proposed strategic site allocations with some concerns noted regarding infrastructure capacity in the main towns, and proposed employment allocations, with some noting the current lack of suitable employment land in the County and the need for employment land to expand existing businesses. It was noted that at this stage the Deposit RLDP sets out the employment land available for development and the next stage is to work with businesses to develop the sites and make them work for Monmouthshire's businesses. The links with the Council's Economy, Employment and Skills Strategy were noted.

In addition, from a skills/employment/apprenticeship perspective, access to colleges and further education and the need for a skills centre was raised by a number of attendees. Officers advised that there is an ambition to provide a skills centre in Monmouthshire and opportunities are being explored to engage with neighbouring local authorities on this matter.

Appendix 5: Consultation Poster

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sir fynwy

Have your say

Monmouthshire County Council is consulting on its Deposit Replacement Local Development Plan (RLDP), which will cover the period 2018-2033.

This sets out land for homes and jobs and protection for our environment.

Public consultation and engagement will run from **4th Nov - 16th Dec 2024**.

See dates of drop-in sessions. Or scan the QR code below to find out more.

Drop-in Engagement events

Raglan Old Church School Community Centre , Chepstow Road, Raglan Tuesday 12th Nov 2pm-7pm	Magor Baptist Chapel , The Square, Magor Wednesday 27th Nov 2pm-7pm
Abergavenny Market Hall , Cross Street, Abergavenny Thursday 14th Nov 2pm-7pm	Portskewett Recreational Hall , Manor Way, Portskewett Friday 29th Nov 2pm-7pm
Usk Community Hub , Maryport Street, Usk Monday 18th Nov 2pm-7pm	Goytre Village Hall , Newton Road, Penperlleni Monday 2nd Dec 2pm-7pm
Palmer Centre , High Street, Chepstow Thursday 21st Nov 2pm-7pm	Caldicot Town Council Building , Sandy Lane, Caldicot Wednesday 4th Dec 2pm-7pm
Shire Hall , Agincourt Square, Monmouth Monday 25th Nov 2pm-7pm	

Online Engagement events

ONLINE - Microsoft Teams Wednesday 13th Nov 2pm-3:30pm	ONLINE - Microsoft Teams Monday 9th Dec 6pm-7:30pm
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Please visit our consultation webpage to sign up for the online events:
www.monmouthshire.gov.uk/rldp-consultation-2024



Helpwch i lunio dyfodol Sir Fynwy

**Dweud
eich
Dweud**

Mae Cyngor Sir Fynwy yn ymgynghori ar ei Gynllun Datblygiad Lleol Newydd Adnued (CDLIA) a fydd yn cwmpasu'r cyfnod 2018-2033.

Mae hyn yn gosod tir ar gyfer cartrefi a swyddi ac amddiffyn ein hamgylchedd.

Bydd ymgynghori ac ymgysylltu â'r cyhoedd yn rhedeg o'r 4ydd Tachwedd i'r 16eg Rhagfyr 2024.

Gweler dyddiadau'r sesiynau galw heibio. Neu sganiwch y cod QR isod i ddarganfod mwy.



Digwyddiadau Ymgysylltu Galw Heibio

Canolfan Gymunedol Hen Ysgol Eglwys Rhaglan,
Chepstow Road, Rhaglan
Dydd Mawrth 12fed
Tachwedd, 2pm-7pm

Neuadd Farchnad y Fenni,
Cross Street, Y Fenni
Dydd Iau 14eg Tachwedd,
2pm-7pm

Hyb Cymunedol Brynbuga, Maryport
Street, Brynbuga
Dydd Llun 18fed
Tachwedd, 2pm-7pm

Canolfan Palmer, Y Stryd Fawr, Cas-gwent
Dydd Iau 21ain
Tachwedd, 2pm-7pm

Y Neuadd Sirol, Sgwâr Agincourt, Trefynwy
Dydd Llun 25ain
Tachwedd, 2pm-7pm

Capel y Bedyddwyr Magwyr, Y Sgwâr, Magwyr
Dydd Mercher 27ain
Tachwedd, 2pm-7pm

Neuadd Hamdden Porth Sgiwed, Manor Way, Porth Sgiwed
Dydd Gwener 29ain
Tachwedd, 2pm-7pm

Neuadd Bentref Goetre, Newton Road, Penperlleni
Dydd Llun 2il Rhagfyr,
2pm-7pm

Adeilad Cyngor Tref Cil-y-coed, Sandy Lane, Cil-y-coed
Dydd Mercher 4ydd Rhagfyr, 2pm-7pm

Digwyddiadau Ymgysylltu Ar-lein

AR-LEIN - Microsoft Teams
Dydd Mercher 13eg
Tachwedd, 2pm-3:30pm

AR-LEIN - Microsoft Teams
Dydd Llun 9fed Rhagfyr,
6pm-7:30pm

Ewch i'n tudalen ymgynghori i gofrestru ar gyfer y digwyddiadau ar-lein:
www.monmouthshire.gov.uk/cy/rldp-consultation-2024

Appendix 6: Consultation Leaflet



monmouthshire
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Monmouthshire County Council's Replacement Local Development Plan (RLDP) 2018-2033

**Land for Homes and Jobs and
Protecting our Environment**

We're consulting on the RLDP
between: 4th Nov - 16th Dec 2024.

For more information on the RLDP
proposals, including consultation
events throughout Monmouthshire,
please visit:

[www.monmouthshire.gov.uk/
rldp-consultation-2024](http://www.monmouthshire.gov.uk/rldp-consultation-2024)

Consultation is open between:
4th Nov - 16th Dec 2024
Tel: 01633 644429





Site location



What's happening in Chepstow?

The RLDP proposes:

Land at Mouton Road

- Approx. 146 new Net Zero Carbon homes, of which approx. 73 will be affordable.
- Commercial uses, such as a hotel and residential care home.

Newhouse Industrial Estate

- 2.5ha of employment land to support Chepstow's job growth.



Cynllun Datblygu Lleol Newydd (CDLIN) Cyngor Sir Fynwy 2018-2033

Tir ar gyfer Cartrefi a Swyddi ac
Amddiffyn ein Hamgylchedd.

Rydym yn ymgynghori ar y CDLIN
rhwng: 4ydd Tachwedd a 16eg
Rhagfyr 2024.

Am fwy o wybodaeth am
gynigion y CDLIN, gan gynnwys
digwyddiadau ymgynghori ledled
Sir Fynwy, ewch i:

[www.monmouthshire.gov.uk/cy/
ymgynghoriad-cdlin-2024](http://www.monmouthshire.gov.uk/cy/ymgynghoriad-cdlin-2024)

Mae'r ymgynghoriad ar agor rhwng:
**4ydd Tachwedd a 16eg Rhagfyr
2024. Rhif Ffôn: 01633 644429**



Lleoliad y safle



Beth sy'n digwydd yng Nghas-gwent?

Mae'r CDLIN yn cynnig:

Tir yn Fford Mounton

- Tua 146 o gartrefi Carbon Sero Net newydd, a tua 73 ohonynt yn fforddiadwy.
- Defnyddiau masnachol, fel gwesty a chartref gofal preswyl.

Ystad Ddiwydiannol Newhouse

- 2.5 hectar o dir cyflogaeth i gefnogi twf swyddi yng Nghas-gwent.

Appendix 7: Consultation A-Board

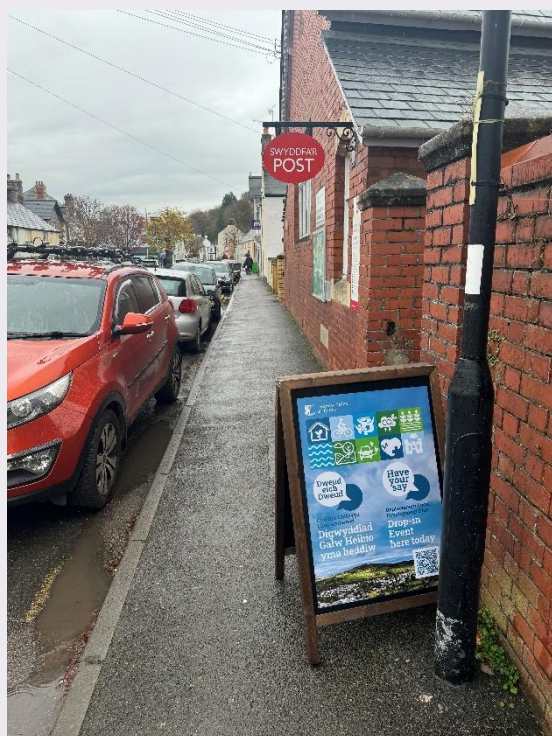
Abergavenny



Monmouth



Usk



Chepstow



Appendix 8: Deposit Matters Notice

Planning and Compulsory Purchase Act 2004 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (Regulation 17) (as amended 2015)

Notice of Deposit Proposals for a Replacement Local Development Plan

Monmouthshire Replacement Local Development Plan 2018 – 2033

Monmouthshire County Council has prepared Deposit Plan documents for the above plan. The Replacement Local Development Plan (RLDP) will, upon adoption, replace the current development plan and be the basis for decisions on land use planning for the County of Monmouthshire (excluding the area within the Bannau Brycheiniog National Park).

The Deposit proposals documents include the Deposit RLDP, the Integrated Sustainability Appraisal (which incorporates the Strategic Environmental Assessment), the Habitats Regulations Assessment, an Initial Consultation Report together with other supporting documents.

Comments are invited on the Deposit Plan proposals documents which outline the Authority's vision, strategy, detailed policies and site allocations, and include key background information.

Consultation on the Deposit RLDP will run from 4th November to 16th December 2024. The Deposit consultation documents are available to view at:

- the Council's website: www.monmouthshire.gov.uk/rldp-consultation-2024/
- County Hall, Usk
- MCC Community Hubs (Abergavenny, Caldicot, Chepstow, Gilwern, Monmouth and Usk), during normal opening hours.
- A series of virtual and drop-in sessions to be held at several venues throughout the County. Details of venues, dates and times can be found on the Council's website.

The closing date for the submission of comments on the Monmouthshire Deposit consultation documents is **midnight on 16th December 2024**.

Comments should be submitted via:

- the online representation form (www.monmouthshire.gov.uk/rldp-consultation-2024/)
- the standard representation form which is available on the Council's website or at the locations listed above.
- emailed to planningpolicy@monmouthshire.gov.uk
- posted to Planning Policy, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA.

Representations should specify the particular part of the Plan to which they relate by paragraph, policy number, or proposals map. In the case of a perceived omission respondents

should indicate the proposed new policy, supporting text, or location of a new or amended site. Respondents should identify how their representation fits with the overall strategy and the Integrated Sustainability Appraisal. This will be essential where the representation seeks the inclusion of a new or amended site or the incorporation of a site rejected by the Authority. All representations made about the Plan will be available for the public to view.

The Deposit RLDP will be considered by an independent Inspector who will assess whether it is 'sound'. There are a number of tests of soundness and objections to the Deposit RLDP should refer to these tests wherever possible.

Representations may be accompanied by a request to be notified at a specified address of the next stage of the RLDP and/or that the RLDP has been submitted to the Welsh Government for Independent Examination and/or of the adoption of the plan.

The Authority is only required to consider representations made in accordance with this notice (duly made). Only those making representations seeking to change the Deposit RLDP whose representations are 'duly made' have the right to appear and be heard by the Inspector at the Examination.

Further information on the RLDP process and relevant background documents are available on the Council's website at www.monmouthshire.gov.uk/rldp-consultation-2024/

Craig O'Connor
Head of Placemaking

Deddf Cynllunio a Phrynu Gorfodol 2004
Rheoliadau Asesiad Amgylcheddol o Gynlluniau a Rhaglenni (Cymru) 2004
Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol) (Cymru) 2005
(Rheoliad 17) (fel y'i diwygiwyd 2015)

Rhybudd o Gynigion Adneuo ar gyfer Cynllun Datblygu Lleol Amnewid

Cynllun Datblygu Lleol Amnewid Sir Fynwy 2018 – 2033

Mae Cyngor Sir Fynwy wedi paratoi dogfennau Cynllun Adnau ar gyfer y cynllun uchod. Ar ôl ei fabwysiadu, bydd y Cynllun Datblygu Lleol Amnewid yn disodli'r cynllun datblygu presennol a bydd yn sail i benderfyniadau ar gynllunio defnydd tir ar gyfer Sir Fynwy (ac eithrio'r ardal o fewn Parc Cenedlaethol Bannau Brycheiniog).

Mae'r dogfennau cynigion Adnau yn cynnwys y CDLIA Adnau, yr Arfarniad o Gynaliadwyedd Integredig (sy'n ymgorffori'r Asesiad Amgylcheddol Strategol), yr Asesiad Rheoliadau Cynefinoedd, Adroddiad Ymgynghori Cychwynol ynghyd â dogfennau ategol eraill.

Gwahoddir sylwadau ar ddogfennau cynigion y Cynllun Adnau sy'n amlinellu gweledigaeth, strategaeth, polisiau manwl a dyraniadau safleoedd yr Awdurdod, ac sy'n cynnwys gwybodaeth gefndir allweddol.

Bydd yr ymgynghoriad ar y CDLIA Adnau yn cael ei gynnal rhwng 4ydd Tachwedd a'r 16eg Rhagfyr 2024. Mae'r dogfennau ymgynghori ar gael i'w gweld yma:

- gwefan y Cyngor: www.monmouthshire.gov.uk/rldp-consultation-2024/
- Neuadd y Sir, Brynbuga
- Hybiau Cymunedol Cyngor Sir Fynwy (Y Fenni, Cil-y-coed, Cas-gwent, Gilwern, Trefynwy a Brynbuga), yn ystod oriau agor arferol.
- Cyfres o sesiynau rhithwir a galw heibio sydd i'w cynnal mewn sawl lleoliad ar draws y Sir. Mae manylion y lleoliadau, dyddiadau ac amseroedd ar gael ar wefan y Cyngor.

Y dyddiad cau ar gyfer cyflwyno sylwadau ar ddogfennau ymgynghori Adnau Sir Fynwy yw **hanner nos ar 16eg Rhagfyr 2024**.

Dylid cyflwyno sylwadau drwy:

- y ffurflen sylwadau ar-lein (www.monmouthshire.gov.uk/rldp-consultation-2024/)
- y ffurflen sylwadau safonol sydd ar gael ar wefan y Cyngor neu yn y lleoliadau a restrir uchod.
- e-bostio planningpolicy@monmouthshire.gov.uk
- ei bostio i Polisi Cynllunio, Cyngor Sir Fynwy, Neuadd y Sir, Y Rhadyr, Brynbuga, NP15 1GA.

Dylai sylwadau nodi'r rhan benodol o'r Cynllun y maent yn berthnasol iddo drwy gyfeirio at baragraff, rhif polisi, neu fap cynigion. Yn achos diffyg canfyddedig, dylai ymatebwyr nodi'r polisi newydd arfaethedig, y testun ategol, neu leoliad safle newydd neu ddiwygiedig. Dylai ymatebwyr nodi sut mae eu sylwadau yn cyd-fynd â'r strategaeth gyffredinol a'r Arfarniad o Gynaliadwyedd Integredig. Bydd hyn yn hanfodol pan fo'r sylw yn ceisio cynnwys safle newydd

neu ddiwygiedig neu'n ymgorffori safle a wrthodwyd gan yr Awdurdod. Bydd yr holl sylwadau a wneir am y Cynllun ar gael i'r cyhoedd eu gweld.

Bydd y CDLIA Adnau yn cael ei ystyried gan Arolygydd annibynnol a fydd yn asesu a yw'n 'gadarn'. Mae nifer o brofion cadernid a dylai gwrthwynebiadau i'r CDLIA gyfeirio at y profion hyn lle bynnag y bo modd.

Mae modd cyflwyno cais gyda sylwadau yn gofyn am gael gwybod mewn cyfeiriad penodol am gam nesaf y CDLIA a/neu pan fo'r CDLIA wedi'i gyflwyno i Lywodraeth Cymru i'w Archwilio'n Annibynnol a/neu am fabwysiadu'r cynllun.

Mae ond yn ofynnol i'r Awdurdod ystyried sylwadau a wneir yn unol â'r hysbysiad hwn (a wnaed yn briodol). Dim ond y rhai sy'n cyflwyno sylwadau sy'n ceisio newid y CDLIA Adnau a bod eu sylwadau 'wedi'u gwneud yn briodol' sydd â'r hawl i ymddangos a chael gwrandawriad gan yr Arolygydd yn yr Archwiliad.

Mae rhagor o wybodaeth am broses y CDLIA a'r dogfennau cefndir perthnasol ar gael ar wefan y Cyngor yn www.monmouthshire.gov.uk/rldp-consultation-2024/

Craig O'Connor
Pennaeth Creu Lleoedd

Appendix 9: RLDP Site Allocation Notice



Cynllun Datblygu Lleol Amnewid Sir Fynwy Monmouthshire Replacement Local Development Plan 2018 – 2033

Ymgynghoriad ar Gynllun Adnau'r CDLIA

Mae Cyngor Sir Fynwy yn ymgynghori ar y Cynllun Datblygu Lleol Amnewid Adnau (CDLIA) a dogfennau ategol am gyfnod o 6 wythnos rhwng 04/11/24 a 16/12/24. Mae'r safle a ddangosir mewn coch ar y cynllun wedi'i nodi ar gyfer tai ar Dir ar Fferm Penlanlas, Y Fenni. Dyma'ch cyfle i wneud sylwadau ar gynnwys y safle hwn neu unrhyw un o'r polisiau a'r dyraniadau/dynodiadau o fewn y CDLIA.

RLDP Deposit Plan Consultation

Monmouthshire County Council is consulting on the Deposit Replacement Local Development Plan (RLDP) and supporting documents for a 6-week period between 04/11/24 and 16/12/24. The site shown in red on the plan has been identified for housing on Land at Penlanlas Farm, Abergavenny. This is your opportunity to comment on the inclusion of this site or any of the policies and allocations/designations within the RLDP.

Dweud eich dweud...

I ddarllen y CDLIA Adnau, a dogfennau ategol, ac i gyflwyno sylwadau:

- Ewch i'n gwefan ymgynghori:
<https://www.monmouthshire.gov.uk/rldp-consultation-2024/>
- Ewch i ymweld â Neuadd y Sir neu Hyb Cymunedol
- Mynychwch y **Sesiynau Galw Heibio** sydd i'w cynnal- ewch i'n gwefan ymgynghori am fanylion.
- Mynychwch **Ddigwyddiad Ymgysylltu Ar-lein**:
2 – 3:30pm, 13/11/24
6 – 7:30pm, 09/12/24

Have your say...

To view the Deposit RLDP, and supporting documents, and to submit comments:

- Visit our consultation website:
<https://www.monmouthshire.gov.uk/rldp-consultation-2024/>
- Visit County Hall or a Community Hub
- Attend a **Drop In Session** - see our consultation website for details.
- Attend an **Online Engagement Event**:
2 – 3:30pm, 13/11/24
6 – 7:30pm, 09/12/24



Sganiwch y Cod QR
Scan the QR code



Dylid gwneud sylwadau ar y CDLIA Adnau erbyn **canol nos 16th Rhagfyr 2024**
Comments on the Deposit RLDP should be made by **midnight 16th December 2024**

Appendix 10: Adjacent Properties Letter



Monmouthshire County Council
County Hall, The Rhadyr, Usk,
NP15 1GA

Cyngor Sir Fynwy
Neuadd y Sir, Y Rhadyr,
Brunbuga, NP15 1GA

Tel/Ffôn: 01633 644429

E-Mail/Ebost: planningpolicy@monmouthshire.gov.uk

Web/Gwefan: www.monmouthshire.gov.uk

Our Ref/Ein Cyf: Deposit RLDP

Your Ref/Eich Cyf:

Date/Dyddiad: 1st November 2024

Dear Sir/Madam

Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033

Deposit Plan Consultation: 4th November – 16th December 2024

Monmouthshire County Council is preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Bannau Brycheiniog National Park) which will cover the period 2018 – 2033. The RLDP allocates land for development, designates land for protection and contains policies to provide the basis for decisions on planning applications. The Plan has reached a key stage in the preparation process known as the Deposit Plan and includes detailed proposals and policies.

At the meeting of the Council on 24th October 2024, the Deposit RLDP was endorsed for public consultation.

We are writing to you because, as you can see from the enclosed notice, your property is close to a site(s) allocated for development in the Deposit Plan. Please find enclosed a leaflet identifying the site and proposed use and how you can find out more about the policies and proposals contained in the Deposit RLDP and how to make comments.

Full details of the Deposit RLDP and its supporting evidence can be found on the Council's website at www.monmouthshire.gov.uk/rldp-consultation-2024

A six-week consultation will take place on the Deposit RLDP from **4th November to 16th December 2024**. All responses must be received by midnight on 16th December 2024. Responses cannot be accepted after this date. Please note that all comments received will be available for public inspection and cannot be treated as confidential. If you wish to make comments you are encouraged to use the online form which can be found on the Council's website noted above.

Yours faithfully

Planning Policy Team



monmouthshire
sir fynwy

Monmouthshire County Council
County Hall, The Rhadyr, Usk,
NP15 1GA

Cyngor Sir Fynwy
Ncudd y Sir, Y Rhadyr,
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Wcb/Gwefan: www.monmouthshire.gov.uk

Our Rcf/Ein Cyf: Deposit RLDP

Your Rcf/Eich Cyf:

Date/Dyddiad: 1st November 2024

Annwyl Syr/Fadam

Cynllun Datblygu Lleol Amnewid (CDLIA) Sir Fynwy 2018-2033

Ymgynghoriad ar y Cynllun Adnau: 4ydd Tachwedd – 16eg Rhagfyr 2024

Mae Cyngor Sir Fynwy yn paratoui Cynllun Datblygu Lleol Amnewid (CDLIA) ar gyfer y Sir (ac eithrio'r ardal o fewn Parc Cenedlaethol Bannau Brycheiniog) a fydd yn cwmpasu'r cyfnod 2018 – 2033. Mae'r CDLIA yn dyrannu tir i'w ddatblygu, yn dynodi tir i'w warchod ac yn cynnwys polisiau er mwyn darparu sail ar gyfer penderfyniadau ar geisiadau cynllunio. Mae'r Cynllun wedi cyrraedd cyfnod allweddol yn y broses o baratoi a adwaenir fel y Cynllun Adnau ac mae'n cynnwys cynigion a pholisiau manwl.

Yng nghyfarfod y Cyngor ar 24ain Hydref 2024, cymeradwywyd y CDLIA Adnau ar gyfer ymgynghoriad cyhoeddus.

Rydym yn ysgrifennu atoch oherwydd, fel y gwelwch o'r hysbysiad amgaeedig, mae eich eiddo yn agos at safle(oedd) a neilltuwyd ar gyfer datblygu yn y Cynllun Adnau. Amgaeir taflen yn nodi'r safle a'r defnydd arfaethedig a sut y gallwch gael rhagor o wybodaeth am y polisiau a'r cynigion sydd wedi'u cynnwys yn y CDLIA Adnau a sut i wneud sylwadau.

Mae manylion llawn y CDLIA Adnau a'i dystiolaeth ategol ar gael ar wefan y Cyngor - www.monmouthshire.gov.uk/rldp-consultation-2024

Cynhelir ymgynghoriad chwe wythnos ar y CDLIA Adnau rhwng **4ydd Tachwedd a'r 16eg Rhagfyr 2024**. Rhaid derbyn pob ymateb erbyn hanner nos ar 16eg Rhagfyr 2024. Ni ellir derbyn ymatebion ar ôl y dyddiad hwn. Sylwch y bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd eu harchwilio ac ni ellir eu trin yn gyfrinachol. Os dymunwch wneud sylwadau, fe'ch anogir i ddefnyddio'r ffurflen ar-lein sydd i'w chael ar wefan y Cyngor fel y nodir uchod.

Yr eiddoch yn gywir

Tim Polisi Cynllunio

Appendix 11: Approximate Number of Representations by RLDP Policy

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
Key Issues, Challenges and Opportunities	Key Issues	13	36	24	73
	RLDP Vision	6	16	14	36
	RLDP Objectives	14	48	18	80
RLDP Sustainable and Resilient Communities Strategy	Strategic Policy 1 – Growth Strategy	5	184	21	210
	Strategic Policy 2 – Spatial Distribution of Development – Settlement Hierarchy	8	152	26	186
Managing Settlement Form	OC1 – New Built Development in the Open Countryside	1	21	7	29
	GW1 – Green Wedge Designations	2	16	18	36
Placemaking and Design	Strategic Policy S3 – Sustainable Placemaking & High-Quality Design	3	31	14	48
	PM1 – Creating Well-Designed Places	3	10	7	20
	PM2 – Environmental Amenity	1	6	3	10
	PM3 – Advertisements	1	2	0	3
	HE1 – Conservation Areas	0	6	0	6

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	HE2 – Design of Shop Fronts in Conservation Areas	1	1	1	3
	HE3 – Roman Town of Caerwent	1	0	2	3
Climate Change	Strategic Policy 4 – Climate Change	10	95	18	123
	Policy NZ1 – Monmouthshire Net Zero Carbon Homes	4	35	16	55
	CC1 – Sustainable Drainage Systems	5	9	8	22
	CC2 – Renewable Energy Allocation	2	9	1	12
	CC3 – Renewable Energy Generation	1	5	3	9
Green Infrastructure, Landscape & Nature Recovery	Strategic Policy 5 – Green Infrastructure, Landscape and Nature Recovery	4	55	26	85
	GI1 – Green Infrastructure	3	6	11	20
	GI2 – Trees, Woodland and Hedgerows	0	2	1	3
	LC1 – Landscape Character	3	5	4	12
	LC2 – Blaenavon Industrial Landscape World Heritage Site	0	0	1	1
	LC3 – Bannau Brycheiniog National Park	1	1	2	4

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	LC4 – Wye Valley National Landscape (AONB)	0	2	2	4
	LC5 – Dark Skies and Lighting	0	2	2	4
	NR1 – Nature Recovery and Geodiversity	2	9	5	16
	NR2 – Severn Estuary Recreational Pressure	1	3	1	5
	NR3 – Protection of Water Sources and the Water Environment	8	9	2	19
	PROW1 – Public Rights of Way	2	2	1	5
Infrastructure	Strategic Policy S6 – Infrastructure	12	138	15	165
	IN1 – Telecommunications, Broadband, and Other Digital Infrastructure	1	4	1	6
New Housing	H1 – Residential Development in Primary and Secondary Settlements	0	8	4	12
	H2 – Residential Development in Main Rural Settlements	3	2	1	6
	H3 – Residential Development in Minor Rural Settlements	0	10	1	11
	H4 – Conversion/Rehabilitation of Buildings in the Open Countryside for Residential Use	0	3	1	4

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	H5 – Replacement Dwellings in the Open Countryside	0	0	0	0
	H6 – Extension of Rural Dwellings	0	0	0	0
	H7 – Specialist Housing	5	3	0	8
	H8 – Housing Mix	5	12	2	19
Affordable Housing	Strategic Policy S7 – Affordable Housing	12	76	25	113
	H9 – Affordable Housing Exception Sites	2	11	3	16
Residential Allocations	Strategic Policy S8 – Site Allocation Placemaking Principles	7	38	6	51
	Table: HA1 – HA18	2	2	0	4
	HA1 – Land to the East of Abergavenny	12	59	16	87
	HA2 – Land to the East of Caldicot/North of Portskewett	10	159	5	174
	HA3 – Land Mounton Road, Chepstow	5	320	2	327
	HA4 – Land at Leasbrook, Monmouth	7	148	2	157
	HA5- Land at Penlanlas Farm, Abergavenny	1	21	2	24

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	HA6 – Land at Rockfield Road, Monmouth	3	3	2	8
	HA7 – Land at Drewen Farm, Monmouth	2	9	1	12
	HA8 – Land at Tudor Road, Wyesham, Monmouth	1	0	0	1
	HA9 – Land at Former MoD, Caerwent	4	7	2	13
	HA10 – Land South of Monmouth Road, Raglan	3	27	1	31
	HA11 – Land-east of Burrium Gate, Usk	3	44	3	50
	HA12 – Land West of Trem Yr Ysgol, Penperlleni	2	17	1	20
	HA13 – Land adjacent to Piercefield Public House, St Arvans	3	8	1	12
	HA14 – Land at Churchfields, Devauden	3	9	1	13
	HA15 – Land East of Little Mill	6	8	4	18
	HA16 – Land North of Little Mill	4	9	0	13
	HA17 – Land Adjacent to Llanellen Court Farm, Llanellen	2	22	1	25
	HA18 – Land West of Redd Landes, Shirenewton	1	95	2	98

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
Gypsy and Travellers	Strategic Policy S9 – Gypsy and Travellers	3	56	7	66
	GT1 – Gypsy, Traveller and Showpeople Sites	1	4	0	5
Employment and Economy	Strategic Policy E10 – Employment Sites Provision	4	23	8	35
	EA1 – Employment Allocations	6	25	8	39
	EA1a – Land at Nantgavenny Business Park, Abergavenny	1	5	0	6
	EA1b – Poultry Units, Rockfield Road, Monmouth	2	0	2	4
	EA1c – Land North of Wonastow Road, Monmouth	1	2	3	6
	EA1d – Newhouse Industrial Estate, Chepstow	1	1	1	3
	EA1e – Land Adjoining Ok Grove Farm, Caldicot	1	3	0	4
	EA1f – Quay Point, Magor	1	8	1	10
	EA1g – Rockfield Farm, Undy	1	0	0	1
	EA1h – Gwent Euro Park, Magor	3	5	0	8
	EA1i – Raglan Enterprise Park, Raglan	1	2	0	3

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	EA1j – Land West of Raglan	2	13	1	16
	EA1k – Land to the East of Abergavenny	1	2	1	4
	EA1l – Land at Former MoD Site, Caerwent	2	1	0	3
	EA1m – Land to the East of Caldicot/North of Portskewett	1	4	0	5
	EA2 – Protected Employment Sites	2	3	3	8
	E1 – Protection of Existing Employment land	0	3	0	3
	E2 – Non-Allocated Employment Sites	0	2	0	2
Rural Enterprise	Strategic Policy S11 – Rural Economy	1	3	0	4
	RE1 – Secondary and Main Rural Settlements Employment Exceptions	1	1	0	2
	RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use	0	0	0	0
	RE3 – Agriculture Diversification	0	0	0	0
	RE4 – New Agricultural and Forestry Buildings	0	0	0	0

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	RE5 – Intensive Livestock / Free Range Poultry Units	0	2	0	2
	RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside	0	1	0	1
Visitor Economy	Strategic Policy S12 – Visitor Economy	1	34	17	52
	T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside	2	5	2	9
	T2 – Protection of Existing Tourism Facilities	0	0	2	2
Sustainable Transport	Strategic Policy S13 – Sustainable Transport	8	66	26	100
	ST1 – Sustainable Transport Proposals	2	8	1	11
	ST2 – Highway Hierarchy	0	2	1	3
	ST3 – Freight	1	2	1	4
	ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas	0	0	0	0
	ST5 – Transport Schemes	5	2	2	9
	ST6 – Protection of Redundant Routes	1	0	1	2

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
Retail & Commercial Centres	Strategic Policy S14 – Town, Local and Neighbourhood Centres	2	28	13	43
	RC1 – Central Shopping and Commercial Areas	0	4	1	5
	RC2 – Primary Shopping Frontages	0	0	1	1
	RC3 – Local Centres and Neighbourhood Centres/Shops	1	0	2	3
	RC4 – New Retail Proposals Outside of Identified Town and Local Centres	1	2	1	4
Community Infrastructure	Strategic Policy S15 – Community and Recreation Facilities	3	34	18	55
	CI1 – Retention of Existing Community Facilities	0	2	1	3
	CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas	1	5	6	12
	CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing	2	1	1	4
	CI4 – Areas of Amenity Importance	1	7	2	10
Minerals	Strategic Policy S16 – Sustainable Minerals Management	2	7	8	17

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	M1 – Local Building and Walling Stone	1	1	1	3
	M2 – Minerals Safeguarding Areas	1	4	1	6
	M3 – Mineral Site Buffer Zone	1	1	1	3
Waste	Strategic Policy S17 – Sustainable Waste Management	1	7	11	19
	W1 – Waste Management Facilities	1	1	1	3
	W2 – Agricultural Land – Disposal of Inert Waste	0	1	1	2
	W3 – Identified Potential Waste Management Sites	2	10	1	13
Monitoring & Review	Monitoring and Review	0	1	0	1
Appendices	Appendix 1 – RLDP Supporting Documents	0	1	0	1
	Appendix 2 – RLDP Key Stages	0	0	0	0
	Appendix 3 – Regional Strategic Partnerships	0	0	0	0
	Appendix 4 – Legislative and Policy Context	0	1	0	1
	Appendix 5 – Regional Collaboration and Linkages with Neighbouring Local Authorities	1	1	0	2

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	Appendix 6 – RLDP Issues	0	0	1	1
	Appendix 7 – Housing Supply Components	0	0	1	1
	Appendix 8 – Infrastructure Delivery Plan	4	11	1	16
	Appendix 9 – Housing Trajectory	0	13	4	17
	Appendix 10 – Employment Land Schedule	0	0	1	1
	Appendix 11 – Supplementary Planning Guidance	1	3	0	4
	Appendix 12 – Glossary of Terms	1	3	0	4
Background Papers / Evidence Base	Housing Background Paper	1	5	0	6
	Gypsy & Traveller Accommodation Assessment	0	1	0	1
	Settlement Boundary Review	0	5	3	8
	Infrastructure Delivery Plan	1	1	0	2
	Sustainable Settlement Appraisal	0	3	0	3
	Minerals Background Paper	0	1	0	1
	Areas of Amenity Importance Review	0	1	0	1
	Open Space Study	0	3	0	3

RLDP Section	RLDP Policy	Comment	Objection	Support	Total No. of Representations
	Emerging Green Infrastructure Strategy	1	0	0	1
	Candidate Site Assessment Report	0	1	0	1
Misc	Constraints Map	0	1	0	1
	ISA	4	19	1	24
	HRA	5	11	0	16
	Other	33	96	6	135
	Soundness	115	407	90	612
	Alternative Sites	67	83	3	153
	Effects the Deposit Plan would have on the use of the Welsh Language.	118	19	3	140
	How the effects of the Deposit Plan on the use of the Welsh language could be improved.	91	13	1	105

Appendix 12: Deposit RLDP Representation Responses

These are set out in separate documents.

- App 12- Guidance Note
- App 12- Vol 1 Key Issues Challenges and Opportunities
- App 12- Vol 2 RLDP Strategic Framework
- App 12- Vol 3 Placemaking and Design
- App 12- Vol 4 Climate Change
- App 12- Vol 5 Green Infrastructure Landscape Nature Recovery
- App 12- Vol 6 Infrastructure
- App 12- Vol 7 New Housing
- App 12- Vol 8 Affordable Housing
- App 12- Vol 9a Residential Allocations S8 & HA1 to HA2
- App 12- Vol 9b Residential Allocations HA3
- App 12- Vol 9c Residential Allocations HA4
- App 12- Vol 9d Residential Allocations HA5 to HA18 & Allocation Table
- App 12- Vol 10 Gypsy and Travellers
- App 12- Vol 11 Employment and Economy
- App 12- Vol 12 Visitor Economy
- App 12- Vol 13 Sustainable Transport
- App 12- Vol 14 Retail and Commercial Centres
- App 12- Vol 15 Community Infrastructure
- App 12- Vol 16 Minerals and Waste
- App 12- Vol 17 Monitoring and Appendices
- App 12- Vol 18 Alternative Sites
- App 12- Vol 19 Maps and General Representations
- App 12- Vol 20 HRA & ISA
- App 12- Vol 21 Background Papers
- App 12- Vol 22 Soundness
- App 12- Vol 23 Welsh Language

Appendix 13: Place Scrutiny Committee Minutes

Place Scrutiny 10th October 2024

Note: Minutes do not serve as a verbatim record of the meeting but provide a summary of the Committee's discussion. For the full discussion, please access the recording of the meeting:

www.youtube.com/watch?v=le1EoOVikQo&list=PLlmqn4nAaFJAaDA9m3C2P8ZdJsca-bkSU&index=18

1. Apologies for Absence

None.

2. Declarations of Interest

None.

3. Public Open Forum

The Chair advised that many submissions had been received and that it would not be possible to read them out at the meeting due to the significant number. She advised that written submissions received in sufficient time ahead of the meeting had been shared with the committee, Cabinet Member and officers, and that any submissions received since, would be forwarded to the Cabinet Member and officers for further consideration.

The Chair noted receipt of 15 written submissions objecting to site CS0270 in the plan, and a further two objecting to land at Moun-ton Road and land west of Usk, Penperllenni. Three members of the public spoke at the meeting about CS0270 raising a number of concerns:

- Sufficiency of infrastructure, how homes will be zero carbon when the developer has not committed to it until 2050, potential increases in phosphate discharge which already exceed permissible levels, questioning whether sufficient funds will be available, asking why the 270 homes can't be added to Abergavenny, and suggesting it is too far from the town centre for walking or cycling whereas at Abergavenny the homes would be closer to the train station.
- Noting that CS0270 is a special site given its beauty and location, its importance to the greater horseshoe bats, its visibility from the Area of Outstanding Natural Beauty and proximity to a scheduled ancient monument, objecting to the loss of prime agricultural land – suggesting that CS0274 would therefore be a better alternative.

- Raising concerns about traffic emissions and air quality monitoring in Monmouth, suggesting that the current methodology is flawed and lacks sufficient data on real or projected emissions.

The Chair thanked the public for their input, through sending written submissions and by contributing to the meeting via the Public Open Forum.

4. RLDP Deposit Plan

Cabinet Member Paul Griffiths introduced the report, delivered a presentation, and answered the members' questions with Craig O'Connor. In his presentation of the report, Councillor Griffiths acknowledged the following:

- Demographic Trends: He highlighted the decline in school-age and working-age populations in Monmouthshire, contrasting with the growth in the over-65 population, emphasizing the need to reverse these trends to maintain sustainable communities.
- Housing and Affordability: He stressed the importance of increasing the supply of housing, particularly affordable housing, to retain young people in the county, highlighting that 50% of the population cannot afford to purchase homes on the open market, necessitating a high level of affordable housing in the plan.
- Plan Proposals: He outlined the plan to provide 2000 new homes over 15 years, with 50% being affordable, explaining that 660 of these would be social housing for rent, with 330 being low-cost home ownership options.
- Employment Land: He discussed the provision of 48 hectares of employment land to support job growth and address the lack of land for business expansion.
- Sustainability and Infrastructure: He emphasized that new homes will be within walking distance of existing settlements, will be net zero carbon, and will be supported by necessary infrastructure.
- Overall Vision: He explained that the plan aims to create younger, more sustainable communities by providing appropriate housing and job opportunities, whilst protecting the environment, and supporting existing town centres.

The Chair thanked the Cabinet Member for presenting the report and proceeded to take questions and key points from the Committee, with answers being given by the Cabinet Member and officers.

Questions and key points raised by the Committee:

- A member asked whether in relation to candidate site CSO270, what the impact would be of the influx of residents arising from the rollover sites from the previous LDP of 280 homes, and how this would affect the number of vehicles on the roads.

They were advised that the planning policy team have reviewed the sites and considered the impact on existing infrastructure and that the Dixon Road site was identified as the most appropriate and sustainable option.

- It was asked whether the 5.8-hectare candidate employment site is sufficient to provide enough employment opportunities for those living in the new homes, in order that Monmouth's residents fulfil the criterion of living sustainable lifestyles. The member raised their concerns about further exacerbation of road congestion.

They were advised that there is 4.5 hectares of employment land allocated at the Wonastow Rd site, and that this should create jobs within the area to balance the housing.

- A member asked how Monmouth qualifies as a sustainable development considering the severe lack of public transport links.

They were advised that Monmouth was allocated a site to keep the community sustainable and ensure a balanced demographic. They also confirmed that the strategic phosphate solution for Monmouth enables sustainable development.

- A member asked why the local transport strategy isn't included within the RLDP and why transport assessments aren't conducted until the planning stage.

Officers advised that infrastructure considerations are part of the planning process, and transport assessments are typically conducted during the planning stage.

- A question was asked as to what processes can be put in place to mitigate the potential harms caused by the post-development loss of green spaces, which could increase surface runoff and intensify flooding.

They were advised that all developments in Wales are subject to sustainable drainage requirements, meaning that runoff must be managed within the site itself to prevent increased flood consequences.

- A member questioned whether the 'dark skies policy' will sufficiently mitigate the harms caused to the greater horseshoe bats, when taking into account the urbanisation of the site and the loss of their feeding locations.

The officers reassured members that environmental considerations, including the impact on local wildlife, are part of the planning process and will be taken into account.

- A member asked about the land ownership of the proposed Abergavenny East development; specifically, if the landowner of CS0293 has agreed to the master plan, and if the land within Monmouth Housing Association's control is within its control. The member expressed concerns about the ability to deliver the proposed master plan if these conditions are not met.

Officers confirmed that both landowners have put their sites forward for development, but that neither has fully agreed to the master plan. The master plans are developed based on the planning policy framework that the Council wishes to impose. Negotiations and detailed conversations with all partners will continue, to ensure that the development proposal is realised.

- A member queried whether the Council is the Council prepared to use compulsory purchase orders (CPOs) as a policy principle to advance key strategic developments.

The Cabinet Member advised that a range of opportunities are available to the Council, and that the approach will be pragmatic and effective, with negotiation being the first priority.

- A member asked about the potential harms from post-development urbanisation, specifically the paving of gardens, which they were concerned could increase runoff and intensify flooding. The member asked whether anything can be done to mitigate such potential harms.

Officers responded that this was a valid point and suggested that the Planning Committee could reduce permitted development rights further if there is evidence that it would result in additional surface runoff. Additionally, any application will need to submit a flood consequence assessment at the planning stage.

- A member highlighted the need to ensure good connections for the large development on the eastern side of Abergavenny, and stressed they felt it was important to achieve a balance between housing and employment land across the county. They raised their concern about pedestrians crossing the AA465 and emphasised the need to integrate travel infrastructure in Abergavenny, asking for reassurance about travel connections if the Abergavenny East development goes ahead.

The Cabinet Member advised that discussions with the developer, the Design Commission, and the Trunk Road Agent have indicated plans for three crossing places across the A465, controlled by lights, to ensure safe pedestrian and driver experiences. He explained that the infrastructure would aim to ensure residents

feel comfortable crossing the road and would integrate the new development with the town.

- Concern was expressed by a member about the significant infrastructure gaps in areas like Monmouth, Caldicot, and Chepstow, particularly in terms of transport, healthcare, and education. They asked how the plan would ensure that communities wouldn't be even more strained in terms of essential services. They also expressed concerns about the practicality of walking and cycling for working couples and young families and their view that there is a lack of clear commitments and timelines for improving the infrastructure.

The Cabinet Member and officers responded that the RLDP is a high-level document and advised that detailed planning applications will follow for all sites. They emphasised that active travel links are being integrated from the early stages to encourage walking and cycling. They also advised that there is ongoing work with the Health Board to manage and respond to healthcare pressures and they stressed the importance of achieving balanced development across the county.

- Another member echoed their concerns around the lack of infrastructure and stated that there is a need for detailed planning to support the proposed developments.

The Cabinet Member and officers discussed the infrastructure delivery plan, which includes provisions for transport, education, and healthcare facilities to support the new developments.

- A member questioned the viability of the RLDP without an in-depth viability statement, especially for major sites. They asked how 50% affordable housing and net zero carbon ready homes would be achieved.

Officers explained that the RLDP allocates land for development, and that the Council has other strategies to attract businesses and create jobs. The economic strategy for example, aims to create a mix of job opportunities, including high-value jobs. The officer confirmed that the viability of 50% affordable housing has been assessed and has been deemed achievable.

- It was questioned why Caldicot East/Portskewett was being identified for a significant share of the county's housing needs and what was the rationale for concentrating development in an area with already limited amenities. The member asked for clarification on plans to address these issues before construction begins.

Officers responded that Caldicot is considered to be a sustainable place for development due to its amenities and connections. Members were advised that the development will include a new primary school and active travel links to

ensure sustainability. Officers confirmed that the Council is working to ensure that infrastructure and amenities are in place to support the new development.

- A member asked for clarity on the land grade for the employment land north of the Portskewett site and raised their concern as to whether farmers are being kept up to date with the process, highlighting a farmer who was unaware of the proposals.

Officers acknowledged the need to engage with all landowners and farmers and promised to follow up on the specific case mentioned, reiterating that the Council is committed to ensuring that all stakeholders are informed and involved in the process.

(Councillor Crook left the meeting.)

- A member raised concerns about the traffic congestion at High Beech Roundabout in relation to the Mounton Road site and suggested that sites in Chepstow should be contingent on High Beech roundabout improvements. The member expressed concern that there are so few references to road infrastructure in the main body of the report and highlighted the need for site-specific requirements for road infrastructure improvements, similar to those in previous plans.

The Cabinet Member and officers responded that High Beech Roundabout is part of the Welsh Government's trunk road network, and that improvements are being considered through a Welsh Government study. They advised that the RLDP includes safeguarding land for potential improvements and confirmed that the development will incorporate necessary mitigations as they are identified.

- It was asked whether the 26 houses at the Shirenewton site are in addition to the 11 houses previously planned at Clearview Court and how concerns about sewage capacity in the area will be addressed.

Officers clarified that the development boundary has changed, and that the 26 houses are the new allocation, with the previous 11 houses no longer included. They acknowledged the existing sewage issues and reassured that they are committed to working with Welsh Water and NRW to address them.

- A member emphasised the need for affordable housing to be available to local people in the Shirenewton area and suggested a mix of housing sizes, including three-bedroom homes, to accommodate young families.

Officers stated that they agreed on the importance of a housing mix and confirmed that the allocation process would prioritise local needs. They advised that the policy framework aims to provide a variety of housing options, including two, three, and one-bedroom properties, to meet the needs of the community.

- It was questioned how the public consultation for the RLDP will ensure that the voices of people who are intended to benefit from the plan can be heard, particularly working-age people and those with young children. They emphasized the need to engage this underrepresented group effectively.

The Cabinet Member responded that the consultation process will include exhibitions, online consultations, public meetings, and drop-in opportunities in all population areas. Efforts will be made to advertise these events widely, including using gazebos on High Streets to increase visibility. He also highlighted the role of local councillors in encouraging community engagement and ensuring a balanced representation of views.

- A member sought reassurance that the RLDP will protect the Nedern and the living levels, emphasising the environmental importance of these areas and the need to balance housing development with environmental protection.

The Cabinet Member advised the committee that the Nedern and the green land around the castle are not only protected but celebrated in the plan. He emphasised that these areas are seen as assets that will connect the existing town with the new development, ensuring their protection and integration into the community.

- The Chair expressed concerns about the removal of habitat in relation to CS0270, and the claim that a buffer would improve it, and expressed concern about the best quality land being removed.

Officers responded, advising that while development will result in the loss of some agricultural land, the plan includes measures to enhance the remaining habitat, in line with planning policy requirements.

- Concerns were expressed about traffic congestion issues at the proposed site, given the increase in cars, as well as pollution, and it was asked how the exit on to Hereford Road can qualify as an emergency exit. A member queried whether there are any guarantees that the site will not grow further.

The Cabinet Member and officers responded, discussing the infrastructure requirements, including improvements to the local bus network and safeguarding land for potential road improvements. They confirmed that detailed transport assessments will be conducted at the planning application stage. The Cabinet Member acknowledged the importance of addressing pollution and mentioned that the environmental health team would review the concerns raised about air quality.

- Another member questioned the possibility of extending the consultation period.

The Cabinet Member explained that there are various engagement methods for the consultation process, and he emphasised the role of local councillors in encouraging community participation.

- A question was asked as to whether the affordable housing can really be considered as 'affordable' and whether there would be a consequent impact on the Section 106 monies associated with developments.

Officers explained that viability assessments will ensure the 50% affordable housing target is achievable and that the mix of social rent, shared ownership, and market housing options will address affordability. The Cabinet Member Griffiths addressed concerns about the affordability of housing, explaining that the proposals are based on the local housing needs assessment. He emphasized that 50% of the population can afford market housing, 17% can afford low-cost home ownership or shared equity, and the remainder would need social rent. He also mentioned that shared equity properties revert to the Council or social landlord at the point of sale to ensure they remain affordable.

The Cabinet Member also sought to reassure the committee that the sums required for Section 106 contributions in the future are comparable to those achieved in the past, indicating that the stress on affordable and zero-carbon housing will not squeeze out funding for necessary infrastructure.

Additional Comments from Members

- A member expressed their concern about the visibility of the site from the Area of Outstanding Natural Beauty and the effect on the view when entering Monmouth.
- Another member emphasised the need to encourage more working age people and retain younger people in the county.
- It was also queried how the Council plans to avoid the risk of Monmouthshire becoming more of a commuter zone than it already is.

Chair's Summary:

As part of her summary, the Chair highlighted the following key points and issues raised by members during the debate:

- Active travel concerns and traffic growth.
- Concerns about commuting traffic due to higher-paid jobs outside the area.
- Concerns about amenities in the Portskewett ward.
- Concerns about the healthcare infrastructure in all areas.
- Monmouth's lack of travel links.

- Concerns about traffic congestion at the Mounon Road site.
- Some concerns about car emissions and pollution, members stressing the need to protect the Nedern and Castle grounds.
- Dark skies policy and bat habitat concerns.
- The need to balance development with environmental protection.
- Concern about the sewage issues in the Mounon Brook area.
- The need for affordable housing for local people and appropriate housing sizes for growing families, particularly the importance of housing for younger people.
- Questions around Abergavenny East development, concerns particularly relating to transportation and active travel, the master plan, land ownership, and compulsory purchase considerations.
- Ensuring local voices are heard and engaging the community effectively.

The Chair acknowledged the substantial public input into the meeting, both in terms of speakers and written submissions and advised that all written submissions would be forwarded to the Cabinet Member and officers following the meeting for their ongoing consideration.

Thanks were given to the public for their input and the Chair explained that the Place Scrutiny Committee is unable to make decisions, but having scrutinised the RLDP Deposit Plan would be offering its feedback to the Cabinet Member and Officers, as to whether the Committee supports the plan in its current form.

A vote took place, with four members of the committee expressing they were not in favour of the plan in its current form and four members supporting the plan in its current form (1 member having left early).

5. Place Scrutiny Committee Forward Work Programme and Action List

The Forward Work Programme was noted and the timescales for the Parking Review would be clarified.

6. Cabinet and Council Forward Plan

The plan was noted.

7. To confirm the minutes of previous meetings:

- 11th July 2024
- 24th July 2024 (Special)
- 3rd September 2024 (Special)

The minutes were confirmed, proposed by Councillor Lucas and seconded by Councillor Wright.

8. Next Meeting: Confirmed as 7th November 2024

Meeting Close

Place Scrutiny 25th September 2025

Note: the following minutes focus on the key points – for the full discussion, the recording of the meeting can be accessed here [Agenda for Place Scrutiny Committee on Thursday, 25th September, 2025, 12.00 pm - Modern Council](#)

Attendance

Councillors: Jane Lucas, Lisa Dymock, Jackie Strong, Martyn Groucutt, Tudor Thomas, John Crook, Louise Brown, Tomos Davies, Emma Bryn, Paul Griffiths, Rachel Buckler, Jan Butler, Tony Easson, Christopher Edwards, Meirion Howells, Catrin Maby, Phil Murphy, Angela Sandles, Su McConnel, Malcolm Lane, Simon Howarth, Martin Newell, Jill Bond, Peter Strong, Frances Taylor, Penny Jones, Sara Burch, Tony Kear, Ann Webb

Officers: Craig O'Connor, Rachel Lewis, Kate Stinchcombe, Ross Price, Nicholas Tulp, Andrew Jones, Debra Hill-Howells, Mark Davies, Louise Corbett, Madeleine Boase, Carl Touhig, Nia Watts, Matt Thomas, Susan Hall, Sarah Jones, Colette Bosley, Hazel Ilett, Robert McGowan

1. Public Open Forum

There was a significant public presence at the meeting with verbal statements made and written statements submitted, reflecting the following key points:

Dr Geoff Walker ~ Site HA11 – east of Burrium Gate)

- Site Positives: The proposed development site is sensibly located on the edge of Usk, close to facilities, and has potential for reasonable road access, making it logical for further development.
- Drainage Concerns: Significant issues with drainage (surface water and foul drainage) need to be resolved before permission can be granted. There is uncertainty about how previous drainage issues have been addressed, and the site's steep slope increases the risk of surface water runoff and flooding, which has already affected residents.
- Access Issues: Access to the site is problematic. The short stretch of Monmouth Road may not support additional junctions, and access via Burrium Gate is considered highly undesirable for residents.
- Both drainage and access solutions will require considerable expenditure, either from the developer or the County Council.
- The development could proceed if drainage and access issues are fully resolved; otherwise, there is risk to current residents.

Gareth Williams - Lichfields: Barrett Redrow Homes and Simon Taber - Ecology Solutions ~ Site HA4, Leasbrook, Monmouth

- There is a significant need for affordable housing in Monmouthshire, with the Council identifying a requirement for 148 new affordable homes per year in the Monmouth housing market area.
- The Leasbrook site will provide 270 new homes, including 135 affordable homes, helping families who otherwise could not access the housing ladder.
- Leasbrook is the only strategic housing allocation proposed in Monmouth and represents nearly half of the town's housing allocation.
- The allocation is central to the LDP strategy, as Monmouth is a primary settlement and must contribute to meeting local needs.
- Delivering new homes in Monmouth is challenging, requiring a balance between urgent housing needs and other considerations.
- Necessary studies have been conducted in line with planning policy and professional standards, showing that Leasbrook can be developed with appropriate mitigation measures.
- Proposed mitigation includes a new 25-metre tree line boundary and sustainable urban drainage systems.
- He confirmed that Simon Taber would address ecology issues.

Jonty Pearce ~ Site HA4, Leasbrook, Monmouth

- Wales is described as one of the most nature-depleted countries, quoting the Future Generations Commissioner.
- Councillors face a stark choice: to destroy or save an environmentally sensitive site.
- The Council and consultants claim limited bat activity, but the Dixon Bat Project recorded the rare greater horseshoe bat 893 times in August alone, averaging 26 recordings per night.
- The site hosts 12 bat species, representing 80% of all bat species found in Wales, which is remarkable and worth saving.
- The Council withheld the 2024 bat survey, which detected only two species and missed the soprano pipistrelle bats from a nearby maternity roost.
- Natural Resources Wales did not agree with the conclusion that there would be no adverse effect on bats.
- The issue should not be wildlife versus affordable housing, as selecting a different site could provide both.
- Proceeding with the current plan risks legal challenges, including appeals and judicial review.
- The evidence supports protecting the site, and the decision is in the Councillors' hands.

Rebecca Cunningham ~ Site HA4, Leasbrook, Monmouth

- The RLDP is one of the most significant decisions the Council will make, and Councillors should keep this in mind.

- The Scrutiny Committee received 15,000 pages of documents to review in just seven days, which is unrealistic for thorough consideration.
- Over 4,000 responses were received from 900 individuals and organisations, with many objections from residents, statutory bodies, and other stakeholders.
- Site HA4 faces major concerns from all directions, yet the Council responded with no changes, which is not meaningful consultation.
- The Council's consultation report claims HA4 is environmentally viable, but its own evidence shows it is the most environmentally damaging option for Monmouth in terms of biodiversity, landscape, heritage, and farmland.
- Developer reports do not reflect the true biodiversity of the site, and HA4 conflicts with the Council's own policies and strategies, including the Nature Recovery Action Plan and Green Infrastructure strategy.
- The site is within 500 metres of the River Wye and adjacent to the Wye Valley Woodlands Special Area Conservation, and development would remove priority habitats, undermining conservation objectives.
- The plan relies on vague mitigation promises, while proper green infrastructure should be embedded from the outset.
- Ignoring consultation responses and misrepresenting evidence undermines scrutiny and democracy.
- She urges Councillors to put aside political agendas, listen to residents, and ensure all evidence, including citizen science, is properly considered before moving the RLDP forward.

Ann Langford ~ video submission ~ Monmouth

- Ann lives in Monmouth and expressed concern that Monmouth could be negatively impacted by surrounding housing estates and increased traffic if the proposed plan to build 270 houses, plus 110 more at the drilling estate, were to go ahead.
- Ann highlighted that Statistics Wales projects a 5% population growth for Monmouthshire from 2018 to 2033, which aligns with past trends, but stated that the plan proposes a 15% increase in housing, which she believed to be excessive. The plan would lead to more pollution and traffic, especially as many new residents would likely commute to the M4 corridor for work.
- Ann noted that Monmouth already experiences traffic congestion, particularly at the Dixon roundabout, suggesting this would worsen with new developments.
- She mentioned potential problems with increased sewage affecting the River Wye.
- Ann concluded that the proposed growth is unnecessary and called for a rethink, emphasising that only 5% growth is needed, not 15%.

Frank Brehany ~ Monmouth Air Quality

- Frank, a Monmouth resident and legal activist with extensive experience in stakeholder reports on consumer and chemical compound issues, raised

concerns about air quality at the HA4 site. He stated that his previous submissions and communications with the Council had not been properly addressed or included in the Consultation Report.

- Frank criticised the Council's reliance on the Local Air Quality Management (LAQM) standards, which only monitor nitrogen dioxide and do not use the discretionary or precautionary principles allowed.
- He advised that objections about air quality were met with a standard response that impacts would be assessed at the planning application stage, which he felt was inadequate and delays addressing the issue.
- He advised that his submission on air quality was eventually included in the meeting pack after he complained, but he clarified that his comments were about air quality, not water.
- He highlighted that the council's response claimed air quality monitoring methods are outside the RLDP process, which he sees as inconsistent, given that methodology is crucial for future assessments.
- Frank emphasised that only monitoring one contaminant does not provide a comprehensive picture of air quality, and without a proper baseline, future assessments are unreliable.
- He urged the Council to adopt robust scientific principles and engage meaningfully with residents on air quality before advancing the RLDP, warning that failure to do so would be remembered as a fundamental oversight.

Rob Elliott ~ Monmouth Air Quality

- Rob expressed concern about increased road traffic from the proposed housing development at HA4/CS-0270, particularly at the Dixon Road junction, which already experiences significant idling and heavy vehicle traffic.
- He warned that more houses would mean more cars and lorries, leading to increased air pollution from particulates, noise, and vibrations, especially affecting children passing through the area.
- Rob argued that the solution is not more housing on greenfield sites but a national sustainable population policy for a stable future environment.
- He requested that all Councillors be made aware of these concerns.

Barwood Land ~ HA3 – Land at Mounon Road, Chepstow

- The submission supported the draft allocation of site HA3 (Mountain Rd, Chepstow) in the RLDP and appreciated the Council's work on the plan.
- They emphasised that the site has been rigorously tested and scrutinised, with clear policy requirements to ensure high-quality, sustainable development.
- The development would deliver 146 new homes (half affordable), a hotel, and a specialist care home, supporting independent living, job creation, and the local economy.
- More than half the site would remain undeveloped, providing extensive open space, parkland, and long-term ecological protection with significant biodiversity net gain.

- The new homes and buildings would be energy efficient, built to last, and designed for a “20-minute neighbourhood” with easy access to shops, services, and sustainable transport options.
- Features would include electric vehicle charging, broadband, a mobility hub, and measures to reduce car reliance and carbon footprint.
- Barwood Land has received strong interest from care home providers and hotel operators and is committed to working with the Council and community to deliver the site’s vision and maximise benefits.

Richard Liddell ~ HA3 – Land at Mounon Road, Chepstow)

- Richard is an architect and planning consultant with long-standing experience and local ties, living next to the Mounon Road site.
- He outlined the planning history, noting the Mounon Road site has been designated as a green wedge since 1981 to prevent urban sprawl and protect open land around Chepstow.
- He referenced multiple planning policies and structure plans over the years that reinforce the need to maintain this green wedge, including the Monmouthshire LDP and specific policies like LC6.
- Richard highlighted a 2024 Council screening application that concluded development would have a significant adverse impact on the valued landscape, biodiversity, and cultural links.
- He described the site as a key part of Chepstow’s countryside setting, visible to those entering the town, and important for maintaining its market town character.
- Richard advised he had conducted a local petition, finding that 70% of nearby residents are opposed the development (46 houses were visited, with 32 responses received). He suggested the majority of Chepstow’s population are against it.
- He argued there is no need to use this site for development when alternatives exist, and noted that as recently as 2024, Council officers were against development due to significant adverse impacts.
- He concluded that the proposal contradicts established planning policies and the majority of local opinion, without addressing additional concerns like traffic and pollution.

Zoe John - Monmouthshire Housing Association ~ HA1 - Land to the East of Abergavenny

- Zoe spoke on behalf of Monmouthshire Housing Association and landowners regarding the site, which is allocated for 500 homes, with 50% affordable housing, a mixed-use neighbourhood centre, park and ride, and B1 uses.
- The allocation followed detailed dialogue with officers and was informed by consultation feedback.
- The site will be a well-connected, sustainable, and deliverable urban extension, contributing significantly to Monmouthshire’s housing needs.

- An independent viability assessment confirmed the site is deliverable, considering infrastructure and build costs.
- Monmouthshire Housing Association is committed to delivering the site as allocated, bringing economic, environmental, and social benefits, especially in addressing affordable housing needs.
- Adoption of the RLDP will support more housing, jobs, and economic prosperity.
- Requested support and endorsement for the RLDP to realise its benefits for Monmouthshire.

William Morgan - Raglan village ~ proposed solar panels and extension to the existing enterprise park

- William and his family farm the land proposed for solar panels and the expansion of Raglan Enterprise Park. He stated there had not been any prior consultation before receiving notification.
- The Enterprise Park extension would be inconvenient but potentially manageable; however, the solar panel project would be disastrous for their dairy business.
- Their farm prioritises wildlife habitat, maintaining wide and tall hedgerows, which could reduce solar panel efficiency due to shading and debris.
- Installing solar panels would undo years of regenerative farming, harm soil quality, and make grazing impossible, especially at night, as 80% of their night grazing land would be lost.
- Crossing the road to access remaining fields is unsafe for cows, especially in poor visibility, increasing the risk of accidents.
- The loss of grazing land would end their dairy business, resulting in at least four local job losses and wider impacts on secondary sectors.
- William noted inconsistency, as another local farmer was refused permission for solar panels, while his younger family-run business faces closure if the project proceeds.
- He raised concerns about increased flood risk from water runoff due to the solar project.
- William supports clean energy but suggests solar panels should be placed on buildings or car parks, not productive farmland.
- He argued the project contradicts the Well-being of Future Generations Act by threatening young farmers' livelihoods and local food security.
- He urged reconsideration of the project to allow his family to continue producing local food.

Gareth Barton – Turley ~ speaking in relation to several sites

- Gareth represented Richborough, promoters of the Showground site, part of the strategic allocation east of Caldicot. He emphasised the collaboration with site owners and other promoters.

- He acknowledged the significant work and challenges in preparing the LDP, highlighting the ambitious nature of the plan, including 50% affordable housing and high sustainability standards.
- He stated that the allocation is supported by extensive technical work and consultation, covering flood, drainage, ecology, landscape, transport, heritage, and infrastructure.
- He explained that a master plan and policy HA2 guide the allocation, with ongoing opportunities for engagement and input during detailed design and planning applications.
- He outlined key benefits: the site is the most appropriate location for strategic allocation in Caldicot/Severnside, as it is partly brownfield, will deliver zero carbon homes (50% affordable), a new primary school, employment, a multi-use games area, and a neighbourhood centre.
- He highlighted the substantial open space and green infrastructure, with no built development in flood zones or west of the former Ministry of Defence (MOD) railway line, protecting the castle setting and ecological designations.
- Gareth spoke of the integration with active travel improvements and contributions to bus services for connectivity. He encouraged the committee to endorse the work and support the LDP as it moves forward.

Catherine Blyth - Asbri Planning ~ (EA1 - Employment Allocations (Site Ref. EA1L: Land at Former MoD Site, Caerwent; HA9 - Residential Allocations - Land at Former MOD, Caerwent; EA1B - Poultry Units, Rockfield Road, Monmouth)

- Catherine represented two site promoters: the mixed-use allocation at the former MOD Training Centre in Caerwent (HA9) and the employment allocation at the former poultry units, Rockfield Rd, Monmouth.
- In terms of the former MOD Training Centre, she emphasised it is a brownfield site, which is vacant, and unused, which is proposed for 20 affordable and 20 open market homes plus flexible office workspace.
- She noted extensive survey and assessment work has been done to show the site can be acceptably developed, with further work planned at the application stage, including biodiversity protection and enhancement.
- She stated the site promoter looks forward to working with the authority to deliver homes and jobs on a sustainably located brownfield site.
- For the former poultry units at Rockfield Rd, she stated it is a deliverable and viable employment allocation on brownfield land in a sustainable location, able to provide high-quality employment space and meet demand for office accommodation in Monmouth.
- Catherine mentioned that there were no objections to the poultry units allocation and the promoter looks forward to progressing the site and working with the authority.

Lynne Garnett - Travelling Ahead

- Lynne supported the inclusion of land in the RLDP for a future Gypsy and Traveller site in Monmouthshire.
- She highlighted the Council's statutory legal duty under the Housing Act to provide for Gypsy and Traveller communities, which remains unmet.
- She emphasised the importance of identifying and setting aside land to address this unmet need.

Michelle Morgan - Monmouthshire Housing Association

- Michelle spoke on behalf of Monmouthshire Housing Association, the largest registered social landlord in Monmouth.
- She stated there are over 3,900 households on the Council's affordable housing waiting list, including 203 accepted as homeless.
- She highlighted that 52% of applicants have a recognised housing need, including homelessness, medical/welfare needs, and overcrowding.
- She stated that 76% of applicants are of working age, with 52% in employment, highlighting affordability issues in the county.
- She identified that the highest demand for affordable housing is in Abergavenny, followed by Chepstow, Caldicot, and Monmouth.
- She advised that 51% of applicants require one-bedroom accommodation, with 70% of those being of working age.
- Last year, 423 homes were allocated, with 51% going to homeless households.
- On average, 98 bids are received per property advertised, showing high demand.
- Wait times for high-need applicants are 12 months or more, varying by property type and area.
- She shared two case studies: one case where social housing had prevented a family breakdown and another case where a working individual remains unable to secure housing despite numerous bids.
- Michelle concluded that there is significant need for affordable new homes, which the replacement local development plan aims to address.

2. Apologies for Absence

None.

3. Declarations of Interest

None.

4. Place Scrutiny Committee Forward Work Programme and Action List

A reminder was given that the Welsh Water site visit for Committee Members would take place on Thursday 2nd October at 1pm.

In relation to the Action List dated 10th July: Car parking information would be sent to the Committee, a meeting to discuss Osbaston Road being arranged.

Action Scrutiny: Animal Welfare team/RSPCA to add to the Committee's Forward Work Programme.

5. Council and Cabinet Work Planner

Noted.

6. To confirm the minutes of the previous meeting

The minutes were confirmed as a true and accurate record.

7. Deposit RLDP Consultation Report

Cabinet Member Councillor Griffiths introduced the report as follows:

- He emphasised the committee's role in scrutinising whether the consultation report is full and fair, with amendments possible based on scrutiny outcomes.
- He stated the plan's first objective is to make more housing affordable, noting half the county's population cannot afford open market homes and a third cannot afford "affordable" homes.
- He highlighted urgent need for social rented housing, referencing Michelle Morgan's earlier contribution.
- He explained the plan will provide 2,000 homes, with 1,000 affordable and 660 for social rent, requiring 50% affordable housing from landowners.
- He noted Monmouthshire is the first in Wales to require 50% affordable housing, with financial plans supporting this.
- He discussed demographic challenges: an aging population, declining school and working-age populations, and the need for more young people to sustain communities.
- He stressed the plan's climate change objective, requiring all new homes to produce as much energy as they consume via solar panels and high build standards.
- He praised high-quality housing design, referencing the Chepstow Brunel Quarter development as an example.
- In terms of concerns relating to traffic impacts, he stated that the Chepstow development did not worsen traffic flows.
- He noted the plan's provision of 50 hectares for economic development to support business growth and employment.
- He summarised the strategic objectives as being 50% affordable housing, 100% net zero housing, and sustaining towns and villages.
- He advised he was committed to responding to scrutiny and keeping focus on strategic objectives.

Andrew Jones delivered a presentation and provided an overview of the deposit RLDP consultation report, explaining its purpose to inform the committee about public consultation results and engagement with the community and stakeholders. He outlined the report's contents: bodies consulted, number of representations, steps taken to publicise and engage, summary of main issues raised, and recommendations on how to address representations.

Andrew summarised the RLDP's chronology, including key dates for strategy endorsement and public consultation. He explained that the deposit consultation had received about 950 individual correspondents and approximately 4,500 objections, supports, and comments, highlighting strong community engagement. He advised that responses had included general comments, objections, support and that there had been both concerns and support for the plan's aspirations. He advised the comments related to the following key consultation themes:

- Growth strategy - debate over whether growth is too high or too low
- Spatial strategy - concerns about disproportionate growth in the south and reliance on large sites
- climate change and net zero - support and concerns about policy links to flood risk and air quality
- The challenge of developing on greenfield land.

Andrew advised there had been concerns about the 50% affordable housing target's financial viability and questions about local allocation of affordable housing. He stressed that the RLDP is not just a housing plan but also addresses employment, with concerns raised about employment land projections and distribution.

He summarised recurring site-specific issues: loss of greenfield/agricultural land, impacts on ecology, highways, flooding, and sewerage. He also mentioned that concerns had been raised about the Gypsy and Traveller site allocation, including site suitability and proportionality. He highlighted issues raised about the Raglan solar farm sites, such as loss of agricultural land, surface water runoff, and biodiversity impacts. He advised that the feedback from the scrutiny committee would be reported to Council, and if endorsed, the RLDP will proceed to independent examination.

Councillor Paul Griffiths, together with Andrew Jones, Craig O'Connor, Sarah Jones, Deb Hill-Howells, Rachel Lewis, Ross Price, Colette Bosley and Kate Stinchcombe addressed Members' questions.

Questions/points raised by Committee Members

Councillor Davies

- He asked the cabinet member if they are familiar with the Gunning principles, which are legal tests for public consultation. He explained the Gunning principles and asked for tangible examples of where residents' views have

directly and materially shaped the plan, rather than just being acknowledged. He asked if the cabinet member recognises that the lack of material change in the plan, despite consultation, raises questions about the credibility of the process and whether it meets the Gunning principles.

The cabinet member explained that detailed consideration was given to every response, but significant amendments to the deposit plan are not made at this stage; changes, if any, would occur during public examination by the inspector. He stated that the process is defined by law, involves copious consideration of public input, and that any significant changes would be determined during the examination by the inspector.

Councillor Lucas

- She asked for clarification on whether the plan has changed and grown since 2018, and specifically if there had been any significant changes to site allocations since the most recent consultation.

Craig confirmed there have been no changes in site allocations since the last consultation, though there have been changes to improve the policy framework, especially regarding climate change, but the evidence behind site allocations remains materially sound.

- Councillor Lucas asked if we have had 4000 consultation responses but no significant changes to the plan since then, whether residents would ask what the point was of a consultation, if the responses are not listened to and no changes are made?

Craig advised that the plan has developed and adapted since 2018, informed by public consultation, and that the amended version enhances the plan, but the technical evidence supports the soundness of the site allocations.

Councillor Griffiths added that all public input and council responses are on record and will be considered by the inspector at public examination. The process does not allow for significant changes at this stage by the Cabinet member, but the inspector can require changes if needed.

Councillor Brown

- She expressed concern about the viability assessment, stating a developer stated that it seemed overly optimistic and based on a weak foundation of an assumption of rising house prices, and questioned whether it adequately covered infrastructure requirements.

Sarah explained that site-specific viability assessments have been done for each allocated site, including all policy and infrastructure requirements, and these have

been independently verified. The detailed financial models are commercially sensitive but show the sites are viable.

- She raised concerns about the soundness of the plan, noting a large number of objections and questioned whether the plan is justified.

The officers reiterated that the evidence supports the soundness of the plan and that all objections and comments are recorded and will be considered during the examination process.

- Councillor Brown asked about traffic issues, referencing projected increases and the need for infrastructure studies, especially regarding pinch points like the Park Wall and High Beech roundabouts.

Debra explained that Welsh Government is developing options to improve active travel and traffic flow at High Beach roundabout, and the council is lobbying for a new link road from the B4245 to the M48 which will reduce pressure on the roundabout.

- Councillor Brown questioned why sites were not made contingent on road infrastructure improvements, as was done in previous plans.

Craig stated that access requirements are included where fundamental, and conditions for active travel links are specified for certain sites, such as Abergavenny East.

- Councillor Brown asked about the viability of the Shirenewton site due to sewage issues, density, and the presence of a main water pipe, and questioned the status of 11 houses with existing planning permission.

Craig responded that the site is viable, utility providers have not objected, and the development boundary has been changed to exclude the 11 houses with existing planning consent, which now need to be implemented under the current permission.

- Councillor Brown questioned whether public engagement has been meaningful, noting that most responses resulted in "no change needed" and doubted whether the inspector would have time to consider all responses.

Officers stated that all responses are recorded and will be considered by the inspector during the public examination, and changes could occur at that stage if warranted.

- She also raised concerns about the Mounton Road site in Chepstow, including traffic congestion, green wedge status, agricultural land, and viability, referencing past failed attempts to develop the site.

Craig explained that the green wedge designation is a local policy that has changed due to housing demand, and detailed site design and traffic issues will be addressed at the planning application stage. The site has been assessed as viable.

Councillor Brown commented that the Shirenewton site is unviable due to the sewage issue and referenced conversations with Welsh Water about how additional houses would exacerbate the issue whereby raw sewage overflows from manhole covers and is managed by the placement of straw bales. She also highlighted the frustration of residents who had spent considerable time taking part in the consultation exercise and that it appeared they had been ignored. There were 320 objections to the Mounton Road site, Chepstow, the highest number in this consultation. This site is promoted by Barwood Land who specialise in planning primarily for residential and the site is sold on with planning for a profit. They are not a Building company, which is an important consideration for the viability of the site as it would be passed onto another site developer. In comparison, the alternative Chepstow site has a direct Building company interest and on a traffic light basis the alternative site does better. Neither Chepstow sites should go forward due to traffic capacity concerns, but the Mounton Road site is madness due to its closeness to High Beech roundabout.

Councillor Dymock

Councillor Dymock thanked officers for their extraordinary efforts in putting the reports together, however, she expressed concerns about the process, including late document changes, limited time for public engagement, and the challenge for residents to digest large volumes of material, questioning how residents can be involved meaningfully in such circumstances. She suggested that the public drop-in session at Portskewett had confused residents, as maps were shown without certain sites, interpreted by residents as sites having been removed.

She advised that she supports affordable housing in principle but that she could not support the scale and the process of proposals proposed for HA2 (Portskewett, Leechpool, Sudbrook, Crick).

She highlighted infrastructure concerns, with Magor and Chepstow acting as bottlenecks, placing severe pressure on local roads (B4245, A48), and nearly 800 homes and a large Gypsy and Traveller site will mean well over 1000 additional vehicles, noting the number of motions having been brought to Council about potholes and dangerous roads.

She spoke of the risk of increased flooding in Caldicot through building on green fields, adding to the water and overwhelming the system. She sought

clarification on how green spaces and flood-prone areas would be managed within the development.

She raised concerns that local GP and dental services are overstretched with people having to go to Newport for dental services.

Councillor Dymock also spoke about her concerns about the merging of Portskewett and Caldicot, which have distinct identities and the impact of large developments on the character of the area. She argued the proposals fail to respect are balance and are not proportionable.

- Councillor Dymock asked what minor changes have been made to the RLDP as a result of consultation, excluding grammatical errors? How many of the 4000 responses were objections, and how many led to Council recommendations? She stated that if voices of 4000 continue to be overlooked, this would be remembered as a missed opportunity and a breach of trust. She suggested it was not too late to take the opportunity to listen and deliver a plan that genuinely takes account of residents, who have not felt listened to through the process.

Rachel stated that the number of objections and comments per policy is listed in Appendix 11 of the Deposit RLDP Consultation Report, with many objections expected for a plan of this nature. The schedule of minor changes (appended to the report) includes factual corrections and some minor policy wording changes, but no substantive changes to the plan.

- Councillor Dymock asked what consultation feedback has been meaningfully incorporated into the RLDP?

Officers responded that some minor policy wording changes were made in response to feedback (e.g., from NRW), but no substantive changes to the plan; stating that all responses are recorded and will be considered at examination.

- Councillor Dymock questioned on what evidence is the allocation of 770 homes to Portskewett/Crick judged proportionate, and why were no reductions proposed despite widespread objection? She argued that proposing such a huge number of houses on outskirts of struggling town centre is inconsistent with the growth strategy.

Craig cited the local housing market assessment, which evidences significant affordable housing need, and explained that the plan balances this need with environmental and demographic challenges.

- She questioned why the HA2 site is named "East of Caldicot" when it mainly affects Portskewett, despite requests to redefine it?

Craig acknowledged the concerns and reiterated the plan's intent to invest in the area and sustain community facilities.

- She also asked about the rationale for a potential waste management site in Crick and whether it relates to the capacity of the existing Five Lanes facility.

Craig clarified that the allocation is a planning requirement for employment/commercial land (B2/B8 use), not a specific proposal, and any future use would be subject to a planning application. There is no current proposal to replace Five Lanes.

- She asked how will flooding be managed, especially around the castle and in flood-prone areas?

Ross explained that new legislation requires sustainable drainage systems (SuDS) for all new developments, ensuring no greater runoff than current Greenfield rates, and no built development will occur on floodplains as per NRW maps and planning policy.

- Councillor Dymock also asked whether the Council or the developer will be responsible for managing water in flood-prone areas?

Craig confirmed that no built development will occur in floodplain areas, and SuDS will be managed and adopted by the council for the lifetime of the development.

Councillor Bryn

- Councillor Bryn raised her concern that the proposed level of growth is too high given falling birth rates and asked how it was determined that lower growth would increase the proportion of older people. She questioned how the plan ensures new homes will rebalance demography rather than increase immigration and noted that more workers already live in the county than there are jobs.

Craig explained that modelling shows the proposed growth would increase the 30–46 age group, supporting working-age population and affordable housing needs. The plan includes policies to ensure a mix of housing types, aiming to retain and attract younger families and working-aged people.

- She asked whether concerns about sustainability and infrastructure, especially for sites other than Abergavenny (e.g., Monmouth), have been addressed, and referenced the impact of previous developments.

Craig stated that Monmouth, Caldicot, and Chepstow are considered sustainable settlements with existing services, and that site design and active travel links will address sustainability and integration.

- She noted the Wye Valley National Landscapes' objection to the Monmouth (HA4) allocation, citing lack of evidence and insufficient consideration of adverse effects, and asked what adjustments have been made to address these concerns, including the lack of a green wedge.

Craig responded that landscape officers and evidence indicate no significant adverse impact on the setting, and a 25m green buffer is planned. The site is considered the last possible development to the east due to ecological constraints.

- Councillor Bryn asked if a green wedge designation for Monmouth would be considered, as was done for Abergavenny.

Rachel explained that a green wedge was considered for Abergavenny because protection sites were submitted during the process, but we didn't receive any candidate sites for protection as green wedge in Monmouth.

Councillor Thomas

Councillor Thomas stated that he welcomed the plan in its overall terms, appreciating that there will always be difficulties, as there always are with change and development and that balances need to be made to secure the greatest benefit for the least pain.

He commented that Monmouthshire was an ageing county with affordability being difficult for younger people and felt that the plan would offer people the opportunity to buy or rent a house, with renting being the only option for many people in such an expensive county. He acknowledged that all members will have residents relaying their stories about not being able to afford a house with a garden for their children to play in. He suggested that whilst the Council cannot tell developers who to house, if Monmouthshire Housing Association could take the lead, people might be able to secure affordable housing and can continue with their lives.

- Councillor Thomas asked for reassurance that the Abergavenny East (HA1) site will be integrated into the town, with good active travel and access links, so residents are not isolated by the railway and A465.

Andrew confirmed ongoing engagement with Network Rail and Welsh Government Highways, and collaboration with the Design Commission for Wales to ensure the site is not a detached island. Technical studies show it is feasible to provide bridges and crossings, and the infrastructure costs are included in the viability assessment.

- He sought reassurance that the Monmouth (Leasbrook) site will help address falling school rolls and demographic challenges.

Craig stated that new housing will help sustain school populations and services by attracting and retaining young families, supporting demographic balance.

- Councillor Thomas asked if the Gypsy and Traveller site in the south of the county (7 pitches) will be established, sustainable, and integrated, noting the council's statutory and moral duty.

Craig confirmed a rigorous site selection process, that the site meets local need, and that it will be sustainable and deliverable if the plan is adopted.

Councillor Jackie Strong

Councillor Strong highlighted the four aims of the RLDP: increasing affordable housing, addressing demographic imbalance, tackling climate change, and supporting employment. She emphasised that other Councillors had spoken about disenfranchised residents in consultation, but of the large number of people on the housing waiting list, how many of them were aware of the RLDP consultation or participated in it.

She stressed that whilst Monmouthshire has a reputation as a desirable place for retired people, there is a need to attract and retain working-age people to support services and the local economy. She cited demographic changes in Caldicot, with a growing proportion of older residents, and argued that the RLDP is needed to allow young people to stay, return, and raise families locally.

She acknowledged concerns about the Caldicot/Portskewett site, welcomed officer reassurances on flooding and drainage, and supported the inclusion of sustainable drainage systems (SuDS).

Councillor Strong stated that the new housing in Severnside would bring opportunities for improved infrastructure, such as a new health centre, active travel, and possibly a new link road.

She advised that in the 1970s, Caldicot had a population of 7% over working age, but that this is now 25%, so there is a desperate need to do something to ensure those who have had to move out of the county due to affordability, can come back and that the only way to achieve that would be to approve the RLDP.

She concluded with strong support for moving forward with the RLDP to address housing and demographic challenges and thanked all the officers who had been involved in drafting the plan.

Councillor Lucas

- Councillor Lucas asked about the current price of an affordable house, the required income to afford such a mortgage, and how many local jobs can sustain that level of income.

Craig explained that 50% of new housing will be handed to social housing associations for social rent and low-cost home ownership, with options for different income levels. The average house price in Monmouthshire is about £400,000, but affordable housing options are designed for lower incomes. Craig offered to follow up with more data.

- She raised concerns about losing affordable housing stock when owners buy out shared ownership and asked how this is being addressed.

Craig stated that affordable housing will be managed by housing associations, ensuring continued availability for those on the waiting list, and that various tenure options will be provided.

- Councillor Lucas questioned how sustainable drainage (SuDS) can be approved for 270 houses in Monmouth when individual infill plots have faced issues.

Craig responded that Ross's team has reviewed drainage strategies for all sites and is satisfied that SuDS can be implemented for the larger developments, though acknowledged some infill plots were incompatible with new legislation.

- She challenged the description of Monmouth's approach as "excessive field areas" and expressed concern about losing green space, especially the visual impact when entering Monmouth.

Craig acknowledged the importance of green space and explained that the RLDP aims to balance development with landscape protection, including green infrastructure policies and buffers.

- Councillor Lucas asked if pre-planning engagement with MCC has occurred for the Monmouth (HA4) site, similar to Abergavenny.

Craig confirmed that pre-application discussions and master planning have taken place for strategic sites, including Monmouth, with input from the Design Commission for Wales.

- She also requested clarification on how citizen science bat surveys (e.g., 893 greater horseshoe bats in one month) have been considered, and whether the 25m buffer is sufficient.

Craig stated that citizen science data was forwarded to consultants (Acom) for an addendum to the Habitats Regulations Assessment, and that the plan includes strong mitigation measures and policy protections for bats and other ecology. Kate Stinchcombe presented supporting evidence and mapping.

Councillor Davies

- Councillor Davies asked about the evidence supporting the delivery and viability of the Abergavenny East development, referencing concerns from the Colebrook estate about land allocation and viability. He requested clarification on how the Council intends to address these concerns.

Councillor Griffiths explained that the site's financial viability has been independently tested and verified, and that the Council is confident in its deliverability. He acknowledged the Coldebrook estate's ownership of part of the land and their alternative proposal, but stated the Council prefers the MHA-promoted site for its better integration with the town. The inspector will consider both proposals during examination. Craig added that MHA has evidence the site can be delivered without the Coldebrook land, and ongoing discussions may resolve the issue.

Councillor Howells

- Councillor Howells questioned how the proposed development at Burrium Gate would ensure existing drainage and sewage issues, especially surface water runoff and flooding, are not worsened? He asked what guarantees could be given to Monmouth Road residents who have experienced historic problems?

Ross Price explained that the site will be subject to SAB (Sustainable Drainage Approval Body) approval, requiring runoff to mimic the natural drainage regime and not increase downstream risk. Recent drainage works and potential future natural flood management will help. On-site drainage will use permeable paving, swales, and basins, improving water quality and biodiversity.

- He asked whether the 1.7 hectares of developer land below the 40mm ridgeline would be sufficient to accommodate 40 homes and supporting infrastructure while protecting hedgerows and biodiversity?

Officers responded that the plan would require SAB approval and biodiversity measures as safeguards.

- Councillor Howells asked how the development would ensure Usk's existing infrastructure (GP services, air quality, road capacity) could cope with additional pressures from new residents and vehicles?

Craig stated that health infrastructure is managed by the Health Board, which is consulted and can request Section 106 contributions if needed. No evidence currently suggests the proposed housing would have a significant impact on infrastructure.

- He asked in respect of Little Mill, how the proposed development would address existing concerns about infrastructure capacity, including drainage, surface water runoff, and adequacy of the local water treatment?

Ross confirmed Little Mill would also require SAB approval for drainage. Craig reiterated that the need for affordable housing is high, and the plan aims to sustain existing services.

- Councillor Howells queried whether given another site in Little Mill is already consented for 15 homes (60% affordable), and the nearby 800-home development in Mamhilad (now quashed), how the need for an additional 20 homes would be justified?

Craig stated there is significant need for affordable housing in Usk and Little Mill, as shown by the local housing market assessment.

- Councillor Howells asked if councillors were to vote in favour of the RLDP, would it still need approval by an independent examiner for Welsh Government? Would all sites still require outline planning, and would developments then require full Monmouthshire planning approval?

Craig confirmed that after Council approval, the RLDP goes to Welsh Government for independent examination. No sites have outline planning consent; all will require full planning applications and public consultation before development.

Councillor Lucas

- Councillor Lucas sought clarification regarding the procedure should a developer submit an application for outline planning permission prior to the Replacement Local Development Plan (RLDP) having been through the Planning Inspector Hearing and formally adopted.

Craig responded that he was not expecting any applications in the immediate future. He noted that applications might be received later in the following year (2026), and that as soon as they were submitted, they would be made available for public inspection. He stated that the Council will not be able to approve any planning applications until the RLDP has been adopted and gone through that rigorous examination process.

- The chair sought further clarification, asking if that means that even if they apply for planning, or outline planning permission, it cannot be granted until it's gone through the Welsh Government (RLDP Planning Inspector)?

Craig confirmed that was the case, stating that in Wales, we have a plan-led system. Unless it's in a development plan, then it would be contrary to our planning policy frameworks, and we wouldn't be able to support it. The officer's recommendation to the Planning Committee would be to refuse it because it's not in accordance with the plan. If and when the RLDP gets adopted, then those sites would be able to be approved. If an application were to land sometime next year, we would wait on the outcome of the inspection on the Replacement Local Development Plan.

Councillor Bond

- Councillor Bond commented on the need for development, affordable housing, and infrastructure in Caldicot, and expressed support for the RLDP's approach.

She stated that as a Caldicot resident, she understood the views of those who do not want more houses in area but commented that there was a need to consider younger people's development, looking to the longer term to provide for working families and to address the falling school roll. She highlighted her concerns that more funding was needed for Caldicot and that there was a desperate need for an M48 trunk road and for Net Zero homes.

- She questioned whether the need for a school and leisure centre improvements would be assessed as part of the planning process and stated enhancements were needed.

Craig confirmed that the leisure centre's condition is recognised and will be addressed, and that a primary school is proposed within the Caldicot/Portskewett development, with infrastructure needs to be assessed as planning progresses.

Councillor Buckler

- Councillor Buckler asked how the Council could ensure that the 50% affordable housing target will not be reduced by developers later, as has happened in the past?

Councillor Griffiths and Craig stated that, unlike previous plans, the 50% affordable housing is a non-negotiable requirement in this RLDP, supported by viability assessments. Any future attempt by developers to reduce this would be refused by the planning committee, and the planning inspector would support the Council's position if the plan is adopted as sound.

- She asked why there had been so few material changes to the plan despite nearly 1,000 public responses and concerns from statutory bodies?

Officers and the Cabinet Member Councillor Griffiths explained that while factual and minor policy wording changes were made, no substantive changes to the plan were deemed necessary based on the evidence and consultation responses. They confirmed that all comments and objections will be considered by the independent planning inspector during the examination process.

- Councillor Buckler questioned how infrastructure and service needs (roads, schools, healthcare, public transport) would be realistically funded and delivered?

Officers responded that the plan includes infrastructure proposals, and their delivery will be assessed and secured through the planning process and Section 106 agreements as developments come forward.

- Councillor Buckler commented that the RLDP process and documentation are difficult for the public to navigate and understand and asked how it could be made more accessible?

Rachel acknowledged the volume and complexity of documentation, explaining it is governed by Welsh Government legislation and regulations, which require this level of detail.

- Councillor Buckler commented that in her view, the plan is unbalanced, with disproportionate growth and employment land allocated to the Severnside area, especially Magor with Undy. She argued that the proposed large-scale growth appeared to be driven more by targets than the actual capacity of communities and countryside to absorb such change, with roads and infrastructure already under pressure.

Craig clarified that the employment land allocations in Magor and Undy are not new but have been in place since 2014, and their location is strategic due to proximity to the M4 and Welsh Government guidance.

- She highlighted her concerns about the impact of extant planning permissions and the use of land for waste sites, especially regarding Planning Policy Wales 12.

Craig stated that the employment allocations are existing, and any new uses (such as waste) would be subject to the planning application process and relevant policy compliance.

- Councillor Buckler questioned the plan's approach to open space designations (e.g., land above Penny Farthing Lane), adding that there is scepticism that issues will be resolved at the planning application stage.

Craig reiterated that open space and other site-specific issues will be addressed through the planning application process, with public consultation and committee scrutiny.

- She also commented that the plan does not reflect the current situation with the Severn Bridge and its impact on local traffic and infrastructure.

Craig and his colleagues replied that infrastructure needs and impacts are considered in the plan and will continue to be addressed through ongoing engagement with Welsh Government and infrastructure providers.

- Councillor Buckler added that there is a lack of confidence that infrastructure will follow development, based on previous experience in Magor with Undy.

Craig responded that infrastructure requirements are set out in Appendix 8 of the plan and will be secured as part of the planning process for each development.

Councillor Taylor

- Councillor Taylor stated that the RLDP process is too complex and documentation-heavy for the public to engage meaningfully with and asked how the process could be made more accessible.

Rachel responded that the process is governed by Welsh Government regulations, which require this level of documentation, and acknowledged the challenge.

- She questioned the value of public and councillor input, noting almost 1,000 responses but very few material changes to the plan.

Officers acknowledged the concern, reiterated that the process is set by regulation, and that all responses are considered, but substantive changes are limited by the evidence base and process.

- She commented that the plan feels unbalanced, with disproportionate growth and employment land in Severnside (especially Magor with Undy and Caldicot). She argued that those with concerns are not unaware of the need for affordable housing in the county, but that there were still some flaws in the plan which made it difficult to support.

Craig clarified that the employment allocations in Magor with Undy are not new but carried over from the previous LDP, and that the location is strategic due to transport links.

- She raised her concerns about large-scale industrial development on the Gwent Levels, with 50% of county's industry on the levels and adjacent to SSSI. She questioned the rationale and policy compliance and commented that it was a lazy approach, disproportionate and contrary to ecological goals, querying how it fits with Planning Policy Wales 12?

Craig responded that these are existing allocations, not new, and highlighted ongoing work with Welsh Government to provide additional protection for the Gwent Levels.

- Councillor Taylor stated that the designation of open space above Penny Farthing Lane, arguing it is usable and should be protected as usable space and asked for its redesignation. She expressed her doubt that issues would be resolved at the planning application stage, based on previous LDP examination experience.

Officers reiterated that detailed issues will be addressed at the planning application stage, as per the process.

- She asked how the plan addresses current Severn Bridge issues and the impact of toll removal on local infrastructure. She highlighted that it had been anticipated that there would be an increase in traffic, compromising the bridge in the longer term and asked how any of these issues would be mitigated.
- *Deb Hill-Howells advised Members that there is on ongoing work with National Highways to address bridge restrictions and future solutions and clarified that these are being actively managed.*
- Councillor Taylor questioned the lack of mitigation for infrastructure issues, expressing concern that development will outpace infrastructure delivery.

Craig referenced Appendix 8 for infrastructure requirements and ongoing lobbying with Welsh Government for improvements.

Penny Jones

- Councillor Jones raised her concerns about the housing project in Raglan. She stated that the total number of houses would exceed 100, which matches a previously refused application. She questioned the Sustainable Settlement Appraisal (SSA): asking who is responsible, how decisions are made, what evidence is used, and whether ongoing developments in Raglan were considered.

Rachel explained the SSA is based on a regional methodology developed by the Southeast Wales Strategic Planning Group, using quantitative data on transport,

services, and employment, and confirmed Raglan is identified as a second-tier settlement. She offered to send the link to the methodology. Craig confirmed the housing allocation for Raglan has been halved from a previous proposal, now at 54 homes, with half being affordable. this and highlighted the benefit of affordable housing for the community.

- She also questioned the need for an industrial site in Raglan, given it already accommodates Tier 2 settlements, and expressed concern about its location on farmland near the historic town and castle, with the area being reliant on tourism. She asked whether it could be justified and if it was just a convenient expansion site.

Craig stated the site is ideally located on the strategic network (A40/A449), provides job opportunities, and there is local business interest in the site.

- Councillor Jones stated that whilst renewables and low-carbon sites are important, she was strongly opposed to the solar park proposal, arguing it would destroy a profitable dairy farm and a family business, and questioned why prime farmland is being used, taking away a livelihood in a rural county. She reiterated that the farm is not just rich farmland but a rare dairy farm, and argued the industrial site is not needed by Raglan residents, as there are already other sites and the area is not known for unemployment. She stated that residents do not any employment in that area as it is reliant on tourism, with transport being dangerous on that stretch of road. She expressed concern that very few changes made, or comments been acted on and that the family had not been consulted. Councillor Jones sought assurance that Will Morgan and his family would be consulted about the solar park's impact on their business and land and their concerns addressed in terms of water run-off and the cattle crossing.

Craig acknowledged the issue was emotive and confirmed he had contacted the Estates Team to ask them to discuss alternatives with the family and noted that Monmouthshire has a high proportion of best and most versatile (BMV) land, so some use for renewables may be necessary.

Councillor Kear

- Thanked officers for all the work involved in bringing the plan to this stage, but shared concerns around the volume of documentation. He cited that flooding concerns in Usk are a major concern and residents feel their views have been ignored. He commented on dental services and surgeries being unable to cater for additional demand. He added that he felt the two sites proposed were unviable and not in the right location and that there had not been any public support at the public sessions held.

Councillor Newell

- Councillor Newell advised that a resident had contacted him asking why the Bat report from the Dixon Bat Project sighting 893 greater horseshoe bats was omitted from the consultation and asked that officers provide an explanation via email (**Action: Craig O'Connor**).

Councillor Butler

- Councillor Butler raised supplementary concerns about the proposed development HA12 (land west of Tremor Asgall, Penperlleni/Goetre Fawr), specifically regarding access to the site. She noted residents' strong opposition to suggested access via Trem yr Ysgol, as the land is privately owned and maintained by residents who have a covenant for its protection and questioned the viability of this access. She highlighted that the alternative access being considered is directly off the A4042 trunk road, which has double-blind bends and a 50-mph speed limit, making it dangerous, especially for a development likely to attract young families. She requested sight of the transport assessment as soon as it is available. **Action: Craig O'Connor**.
- In terms of HA12 (land west of Trem yr Ysgol, Penperlleni/Goetre Fawr), Councillor Butler also questioned whether 50% affordable housing is viable for a small development of 42 houses, and whether such a high percentage would deter open market buyers. She read a submission from a resident outlining his concerns which included legality of access, impact on amenities, potential damage to trees and wildflower meadow, road width, Welsh Water's comments on pipe capacity, flooding from canal overflow, and increased traffic on School Lane, warning of potential legal challenge by residents.
- She stated that she supported the principle of a small development (42 houses, 50% affordable) due to local need for two- and three-bedroom homes but raised major concerns about site access and questioned how sure officers are that the site is sound and deliverable.
- *Craig explained that the developer claims to have right of way over the land in question, and both access options (via Trem yr Ysgol and the A4042) are being explored. Legal and engineering issues (including covenants, road width, and water pipes) will be fully scrutinised at the planning application stage and by the inspector. Craig acknowledged there is a legal dispute to be resolved and that if access is ultimately deemed unacceptable, the development would not proceed. He confirmed that engineering solutions for water pipes and flooding would be addressed in the detailed planning application and that no building would occur within 3 metres of the water main. He reiterated that the site is considered deliverable based on current evidence, but if access proves unviable, the development would not proceed. He invited residents to submit any further technical information about access, clarifying that while the consultation period is closed, technical evidence can still be considered for this specific issue.*

Councillor Sandles

- Councillor Sandles read two letters on behalf of residents who could not attend, both highlighting the urgent need for affordable housing for young people, care leavers, and those with additional needs in Monmouthshire.

The first submission - Jake, 19, care leaver in Monmouth: Jake is about to leave foster care and has secured an apprenticeship. He would like to stay in Monmouthshire near his support network, but he cannot afford local rent. He has no family safety net and he needs affordable safe housing to become independent. He supports the development plan for creating more affordable homes, which would give care leavers like him a real chance to stay in the county and build their lives.

The second submission - a parent of four young men, including two foster sons: The eldest son is 27 and has autism and wants to live independently, but remain close to family for support. The second son is 25 and has Attention Deficit Hyperactivity Disorder. He works full-time but cannot afford to live locally and needs family support. The eldest foster son is 19 and has no chance of returning to his birth family. He wants to remain in the area for support and is employed and progressing well. The youngest foster son is 18 and has complex needs and will need to remain with the family until suitable local supported housing is available. The lack of affordable housing makes independence difficult for all four young men, especially those with additional needs. They welcome the RLDP's commitment to increasing affordable homes and urge the Council to deliver on this ambition, as it would transform their futures and allow them to contribute to the community.

Chair's Summary:

The Scrutiny Committee's role was to consider the Consultation Report. Full Council will consider whether to submit the RLDP to the Welsh Government for independent examination when it meets on 23rd October 2025. The Chair recognised the scale of the public consultation that was undertaken and thanked everyone involved and the residents for attending and speaking in the Public Open Forum.

With reference to the report's recommendations to:

- Consider whether the Deposit RLDP Consultation Report reflects the consultation process
- Provide comments and observations on the consultation report prior to Council consideration on whether to endorse the RLDP

The Chair summed up many of the key points relating to the consultation process itself and some of the observations from Councillors who had spoken on behalf of their

residents. The Committee agreed that in order to provide full and balanced feedback, the complete minutes of the Place Scrutiny Committee's meeting on 10th October 2024 and those of the meeting held on 25th September 2025 would be appended to the final consultation report that is taken to Council on 23rd October 2025. **Action: Craig O Connor.**

8. Next Meeting: 9th October 2025 (Special)

The meeting closed at 18:53.