



Monmouthshire Replacement Local Development Plan

2018-2033

Report Of Consultation: Appendix 12 Deposit RLDP Representation Responses

Volume 9c – Residential Allocations
Policy HA4

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Residential Allocations

Policy HA4 – Land at Leasbrook, Monmouth

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1024 / Dŵr Cymru Welsh Water (DCWW) / Comment	Note a Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water network and public sewerage system. The potential 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 and sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Add that the site is crossed by a 5" diameter watermain. Note further that the site is located in the catchment of the Monmouth WwTW, from a phosphorus perspective, NRW have completed the permit review process and have confirmed that the consent limit of 2mg/l is applicable. DCWW is delivering a scheme at the WwTW by March 2025 and advise that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of a scheme at the WwTW.	An Infrastructure Delivery Plan 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 sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plan's sites allocations. The IDP is included within Appendix 8 of the RLDP and reflects the comments made by Dŵr Cymru Welsh Water (DCWW). The Council will continue to work with DCWW throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1356 / Welsh Government / Comment	It would be beneficial for the examination that further technical work is undertaken to demonstrate that the broad scale of growth can be accommodated on the Caldicot and Monmouth sites where there could be issues relating to built heritage,	Comment noted. Further technical work, as relevant, will be undertaken to inform the examination process.	No change required.

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	potential Gwent Levels (National Natural Resource Area) impacts etc.		
1412 / Natural Resource Wales (NRW) / Objection	Ecology concern for foraging bat SAC - The value of the allocated site within the context of the Core Sustenance Zone has not been determined and therefore the effect of the permanent loss of this area has not been assessed (points 3 -11).	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 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. Regarding the conservation objectives specific to Wye Valley and Forest of Dean Bat Sites SAC, sufficient foraging habitat is maintained with minimal loss in suitable foraging habitat within the Core Sustenance Zone of designated roosts within the SAC. Policies to control the impact on habitats bordering the proposed sites are implemented in the RLDP, including policy requirements to minimise the impacts of light spill, and linear features that could serve as bat flight lines are protected both broadly within the RLDP and via site specific measures implemented in all of the proposed residential allocation policies.	No change required.
1412 / Natural Resource Wales (NRW) / Objection	HA4 - Leasbrook - additional GI masterplanning - Findings of an updated HRA may lead to further mitigation measures for bats which should be incorporated into the sites GI requirements. There may be also requirements for dormice (point 29).	Green Infrastructure Masterplanning is an important part of planning application development which will build upon the Indicative Masterplan to develop appropriate strategic Green Infrastructure requirements to deliver Net Benefit for Biodiversity. This will be in accordance with the stepwise approach in Planning Policy Wales and RLDP Policy NR1. Masterplanning will be informed by the ecological baseline and ongoing survey and assessment.	No change required.
1412 / Natural Resource Wales	HA4 - Leasbrook - landscape concern - needs to be more consideration on how	RLDP Policy LC4 Wye Valley National landscape (AONB) includes a reference to a firm policy statement 'development proposals that are outside the National	No change required.

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(NRW) / Objection	the development could reduce visual impact upon the Wye Valley National Landscape (AONB) (points 30 and 31)	Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. RLDP Policy LC1 clearly covers the topic of impacts on landscape character such as (a) visual intrusion, (b) landscape character (e) harmonising /enhancing landform and landscape and with a further emphasis on landscape identified through Landmap LCA as being high and outstanding quality. The RLDP is about allocation of land for development. A planning application for such a site will require an EIA screening opinion and probably an EIA/ES to support the application which will consider the high-level site-specific assessment of the likely effects of the site and development proposal on the national landscape.	
2031 / Peter Fox OBE MS Senedd Member for the Monmouth Constituency / Objection	Visual concerns as site is the gateway to Wales and the current backdrop is valued by many.	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 (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. 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.	No change required.

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		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.	
3588 / Wye Valley National Landscape - Planning Officer - Miss Catherine Laidlaw / Objection	Suggest the justification for expanding Monmouth's settlement boundary to include land east of the town lacks adequate evidence and fails to sufficiently consider the potential adverse effects on the Wye Valley National Landscape (WVNL) and its setting.	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 (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. Any proposals on the Land at Leasbrook (HA4) site would also need to have regard to RLDP Policy LC4 Wye Valley National Landscape (AONB) which includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. Furthermore, 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.	No change required.

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3588 / Wye Valley National Landscape - Planning Officer - Miss Catherine Laidlaw / Objection	Note HA4 makes no reference to the Wye Valley National Landscape and its location within the setting, including its function and contribution to key views. Suggest as the site is located in the setting it contributes to the overall Special Qualities of the designated area as identified in the Wye Valley AONB Management Plan 2021 - 2026 which is a material consideration. State there is insufficient evidence that the regard to the purpose of the National Landscape has been considered and evidenced.	It is recognised that there is no specific reference to the Wye Valley National Landscape within Policy HA4, however the RLDP should be read as a whole. Any proposals on the site would also need to have regard to RLDP Policy LC4 Wye Valley National Landscape (AONB) which includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. Furthermore, 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.	No change required.
2484 / Councillor Jane Lucas / Objection	Too close to the SSSI bat Roost. Too close to AONB. Create more traffic congestion. Built too close to extraction point for drinking water. Is set away from the employment opportunities the other end of the town. 50% affordable housing is not achievable.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. In accordance with Welsh Government guidance set out in the Development Plans Manual (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, which has informed the preparation of the RLDP. 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. 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. There has been a continuing dialogue with the site promoters during the preparation of the RLDP. A number of studies have been submitted in support of the site and further additional detailed work will be undertaken through the planning application process.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
2821 / Councillor Rachel Buckler / Objection	Object to allocation HA4 due to the following: drinking water safety - drinking water abstraction points and surface water run-off need to be carefully considered; preservation of the Wye Valley National Landscape; traffic considerations; and conservation of the greater horseshoe bats.	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 Dixon 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Policy LC4 includes a firm policy statement noting	No change required.

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		‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. 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. 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 Dixon Conservation	

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		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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1787 / Gwent Wildlife Trust / Comment	Refer to the River Wye SSSI & SAC and note it needs to be proven that development of this site would not have any adverse impact on the water quality within the River Wye. State it is of particular pertinence to the validity of the HRA.	Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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.	No change required.

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		The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye.	
1787 / Gwent Wildlife Trust / Comment	Have been advised by people expressing concern that the potential developer has been advised that they do not have to undertake an Environmental Impact Assessment. GWT expect a development of this size to require an EIA.	Separate requirements under other legislation including The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 will be required to ensure development is acceptable. To date an EIA Screening request (DM/2024/01250) has been submitted to Monmouthshire for a formal screening opinion to confirm if an Environmental Impact Assessment (EIA) is required in respect to development at the site. This screening opinion concluded that an Environmental Statement will be required for the site.	No change required.
1787 / Gwent Wildlife Trust / Comment	Refer to the nearby Newton Court Stable Block SSSI and Forest of Dean Bat Sites SAC along with the Core Sustenance Zone. Question the use of a 1km Core Sustenance Zone and suggest this should instead relate to 3km based on the precautionary principle which would fully encompass the site. If the proposals progress GWT regard it imperative adequate surveys are undertaken to assess whether there is any reasonable likelihood of an adverse impact on Greater Horseshoe Bats both in terms of the integrity of the SSSI and the SAC. Refer to paragraphs 10.10.4 to 10.10.6 of the Deposit Plan and any bat survey work that will be undertaken.	The Habitats Regulations Assessment (HRA) does not specifically discuss 1km Juvenile Sustenance Zones at all (except where it directly quotes policy wording, which refers to the Juvenile Sustenance Zone) and uses 3km as the basic zone for assessment which seems to be what the objector is advocating. For consistency, HA4 will be amended to refer to the Core Sustenance Zone rather than the Juvenile Sustenance Zone. As discussed in the Deposit HRA, the Deposit Plan addresses the principles of the suggested text through Policy NR1 – Nature Recovery and Geodiversity and its supporting text 10.10.2 – 10.10.8 under the heading International/National (Statutory) Sites and Species. In addition, Policy LC5 – Dark Skies and Lighting, offers further policy requirements in relation to external lighting and potential impacts on biodiversity and ecology. Similarly, Policy S8 – Site Allocation Placemaking Principles, covers dark corridors as well as requirements in the site-specific allocation policies where relevant, for example HA4 – Leasbrook, Monmouth. The Deposit HRA goes on to note that the recommendation was made to provide guidance to developers over the specific issue and investigations that would need to undertake. However, it is recognised that the inclusion of further details in guidance such as Supplementary Planning Guidance or by reference to this HRA report would provide advice to developers regarding the steps needed to investigate this specific issue of functionally-linked land for bats, without being too specific in policy, given that functionally linked land is a consideration for other European sites such as Severn Estuary SPA/Ramsar, and bat surveys at periods	No change required.

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		other than April to September may sometimes be required. It is therefore considered that the policy in the Local Plan does provide a sufficient policy framework to ensure no adverse effects on the integrity of European sites will arise. In addition, 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 regards 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 Sustenance Zone of designated roosts within the SAC. 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. 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.	
3591 / Monmouth Town Council / Objection	Potential increase in traffic congestion and subsequent air pollution. The potential decline in drinking water quality. The negative impact on the environment in which it would sit. The site is in close proximity to a SAM. There are extensive local objections. Lack of employment nearby.	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 (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. 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.	No change required.

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		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. Any air quality impact will be assessed as part of the planning application process. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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	

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		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. 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 Dixon 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) of Policy HA4 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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.	

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		The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	
3591 / Monmouth Town Council / Objection	No comment made.	Objection noted.	No change required.
3562 / Gateway to Wales Action Group / Objection	Suggest inclusion of HA4 is contrary to paragraph 6.4.4 and 6.4.7 of the Plan as it is not previously developed land and has a higher agricultural value than other sites such as CS0274. Suggest it is the worst connected Preferred Strategy site in the County and also contrary to Policy OC1, S3, PM1, PM2, S4, S5, GI2, LC1 and S13. Object to the site on the grounds of drinking water contamination, surface run-off pollution, raising phosphate levels in the River Wye, SuDs not being effective on phosphates, traffic congestion, air pollution, residents relying on cars as active travel is difficult, loss of habitat of endangered greater horseshoe bats, effect on the landscape setting of the Wye Valley AONB, landscape setting of Dixton Mound SAM, loss of prime agricultural land, landscape sensitivity and flooding. State it is 2000 metres from the furthest part of the site to the Shire Hall which could take up to 40 minutes so suggest residents will not travel by foot or bike.	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 Deposit Plan allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites. 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 (HA4) is considered to be a sustainably located edge of settlement site north of Dixton 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	No change required.

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		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 paragraphs 3.1.6, 6.4.7 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. 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. Comments on alternative sites are provided in the relevant section of the Report. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and	

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		in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		Assessment, and also includes specific reference to junction mitigation/improvement measures and a public transport link if necessary. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon 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) of Policy HA4 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. 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	

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		appropriately enable the authority to address concerns of impact on landscape character and visual amenity. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3562 / Gateway to Wales Action Group / Objection	State HA4 will adversely affect the Sustenance Zone of 3km required for the Greater Horseshoe Bats in the Newton Court SSSI. State the change from prime farmland to residential will affect the local population of dung beetles a food for bats. Provide a detailed response in relation to the impact of bats including on foraging habitat, commuting routes and light sensitivity.	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 Dixon 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) of Policy HA4 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.	No change required.
3562 / Gateway to Wales Action Group / Objection	State HA4 will adversely affect the distinctive landscape of the Wye Valley AONB, a view that has not changed since the Wye Tour of 1780 contrary to LC1.	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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage.	No change required.

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		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.	
3562 / Gateway to Wales Action Group / Objection	Suggest HA4 will reduce local food production by change of use from prime farmland to residential development.	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.	No change required.
3562 / Gateway to Wales Action Group / Objection	State HA4 will adversely affect water resource management by the increase of phosphates caused by the development of the site for housing.	Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	No change required.

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		hydraulic capacity to accommodate the site. This information will be required at 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.	
3562 / Gateway to Wales Action Group / Objection	Suggest HA4 would not meet requirements set out in Policy S6 as it is not practical to install an Active Travel Route to the town centre due to multiple road crossings. Note sewage treatment is at 100% capacity and DCWW have not demonstrated its ability to cope with more sewage treatment, and drinking water quality is already poor and would be adversely affected by run off from the site. State public transport in Monmouth is the worst of the primary settlements. Suggest the amount of social housing required will result in S106 contributions being small with an insignificant effect on improving infrastructure.	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. This will be further considered as part of the planning application process. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. The IDP includes reference to active travel noting details are to be determined through Transport Assessment and masterplanning of the site. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues. 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	No change required.

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		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 will be required at 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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The provision of affordable housing is a key priority of the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. 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 policy requirement to deliver 50% affordable housing 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.	

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		In accordance with Welsh Government guidance set out in the Development Plans Manual (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, which has informed the preparation of the RLDP. 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. 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. There has been a continuing dialogue with the site promoters during the preparation of the RLDP. A number of studies have been submitted in support of the site and further additional detailed work will be undertaken through the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3562 / Gateway to Wales Action Group / Objection	Provides a detailed response on the impact of the site on Water Quality noting if there is any surface water pollution from the site it will flow into the brook network close to Dixon Church and enter the River Wye and could contaminate drinking water. Refer to two notices from the Drinking Water Inspectorate in relation to Monmouth's water supply. Suggest building houses at HA4 upstream of the Water Treatment	Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	No change required.

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	Works could cause serious problems for public health.	hydraulic capacity to accommodate the site. This information will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Furthermore, 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.	
3562 / Gateway to Wales Action Group / Objection	Suggest SuDS will not work well on Heavy Clay Soil that is found on HA4. State the site is not suited to an infiltration based SuDS system. Also note the SuDS pond is placed in a flood zone on the masterplan.	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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is	No change required.

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		discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP.	
3562 / Gateway to Wales Action Group / Objection	State the site is located close to Dixon Roundabout a major traffic pinch point which regularly faces heavy congestion, suggest the inclusion of the site will result in increased congestion conflicting with Policy ST1 and ST2. Suggest the ISA highlights this site is the worst option given its location. Concern over the lack of a detailed traffic assessment.	In accordance with the Sustainable Transport Hierarchy, the RLDP 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. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 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	No change required.

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		level of development to be acceptable in principle. The detailed design of the site will be presented as part of the planning application process.	
3562 / Gateway to Wales Action Group / Objection	State residents will rely on the car as active travel is difficult, state the site is located 2000m away from the town centre and nearest shop, is up a steep slope, the nearest cycle path is over 2000m away and cycling involves using the A466 Dixon Road a major arterial road with over 4400 vehicles using the route every day.	In accordance with the Sustainable Transport Hierarchy, the RLDP 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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. In addition, the Infrastructure Delivery Plan (IDP) includes reference to active travel noting details are to be determined through Transport Assessment and masterplanning of the site. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues. 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.	No change required.
3562 / Gateway to Wales Action Group / Objection	Refer to the impact on bats and suggest the developer has applied not to do an Environmental Impact Assessment which is of concern.	Separate requirements under other legislation including The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 will be required to ensure development is acceptable. To date an EIA Screening request (DM/2024/01250) has been submitted to Monmouthshire for a formal screening opinion to confirm if an Environmental Impact Assessment (EIA) is required in	No change required.

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		respect to development at the site. This screening opinion concluded that an Environmental Statement will be required for the site.	
3562 / Gateway to Wales Action Group / Objection	State HA4 is within the landscape setting and clearly visible from the Wye Valley National Landscape (AONB), suggest it would be difficult to screen out the site from the national landscape. State the site would also have an impact on the Dark Skies of the 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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. The RLDP includes a specific policy (LC5) relating to dark skies and lighting that must be considered as part of a detailed planning application.	No change required.
3562 / Gateway to Wales Action Group / Objection	Concern of HA4 being located in a historically sensitive site that is within 180m of a Scheduled Ancient Monument (Dixton Mound) and within 40m of a Conservation Area.	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 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.	No change required.

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		The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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.	
3562 / Gateway to Wales Action Group / Objection	State the site is prime agricultural land 80% Grade 2 and 20% Grade 3a. Suggest development should be directed to land of the lowest grade and should be CS0274 instead.	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. 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. Comments on alternative sites are provided in the relevant section of the Report.	No change required.
1503 / Redrow Homes (South	Endorse the allocation as it assists in delivering the RLDP vision, in particular supporting people living in sustainable	Support welcomed.	No change required.

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Wales) Limited / Support	resilient communities with better access to local services and facilities, open space and employment opportunities.		
1503 / Redrow Homes (South Wales) Limited / Objection	Note the scheme has evolved and the indicative masterplan as a consequence needs to be revised so the open space in the far north is moved south as this will form part of the SUDS function.	The RLDP includes indicative masterplans for the four strategic sites, including HA4 Land at Leasbrook, Monmouth. These are indicative only and were considered to be a helpful aide to the Deposit RLDP consultation process by providing a visual interpretation of the site's broad parameters, policy requirements and proposed uses. The masterplans will be updated through the planning application process and will, therefore, be subject to further changes/iterations. The status of the masterplan for Land at Leasbrook, Monmouth is reflected in Policy HA4 which clearly states that a masterplan will be agreed with the Local Planning Authority prior to the determination of any planning application. It is not, therefore, considered necessary to amend the masterplan as suggested. Sustainable drainage features within areas of floodplain will be considered in accordance with national policy, including TAN15.	No change required.
1503 / Redrow Homes (South Wales) Limited / Comment	Refer to the site and requirements for public transport, note that given the proximity of the site to the bus stop on Dixon Road a public transport route within the site is supported if necessary as stated in Policy HA4.	Comment noted.	No change required.
1663 / Richborough / Objection	Whilst supportive of development in Monmouth state it is more appropriate for strategic development to be directed to the west of the settlement. State the Leasbrook site is subject to a number of issues that would need to be overcome including flooding affecting the ability for suitable access arrangements, ecological constraints/sensitivity, proximity to two SAC, landscape sensitivity associated with the adjacent Dixon Conservation Area and	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 (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	No change required.

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	the Lower Wye Valley Landscape of Historic Interest. Suggest the site also comprises a higher proportion of BMV agricultural land, when compared with Land at Wonastow Road. Suggest it doesn't perform as well against parts of the ISA compared to Land at Wonastow Road.	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. 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 Dixon 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 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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. Regarding heritage impact, 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 not to be read as adjacent to the Conservation Area. Dixon 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 is it 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. 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	

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		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. Land north of Wonastow Road, Monmouth (Policy EA1c) is allocated in the RLDP for B1, B2 and B8 uses. The proposed allocation provides much needed employment provision in Monmouth. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
1383 / Taylor Wimpey / Objection	Concerns relating to the site's suitability to accommodate future development, suggest the site represents an illogical extension to the existing settlement on Monmouth and leapfrogs the playing fields of the adjacent Haberdasher's Preparatory School which creates a natural boundary. Concerns in relation to landscape, impact on views of the Wye Valley National Landscape, lack of active travel links. Suggest the site would fail Test 3 of the tests of soundness.	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'.	No change required.

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		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. In relation to active travel, 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 Dixon Close and along Dixon 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. 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. There has been a continuing dialogue with the site promoters during the preparation of the RLDP. A number of studies have been submitted in support of the site and further additional detailed work will be undertaken through the planning application process. Consideration of the Plan's soundness is set out in the Self-Assessment of the Deposit Plan against the Tests of Soundness which demonstrates that the Deposit Plan and the processes followed to reach this stage are 'sound'. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	

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1029 / Ann Langford / Objection	Strongly object to the development because of environmental damage to; the natural environment, wildlife and development of greenfield land, the beauty and heritage of the natural landscape, the site's location in a designated ancient forest, the horseshoe bat conservation site and a scheduled ancient monument. The proposed development site compromises the whole landscape wherein these SSSI and heritage sites lie. Environmental checks completed by the council are insufficient and unacceptable. Concerns re drinking water, phosphate runoff and sewer infrastructure. Development will increase traffic throughout the town and increase CO2 production specifically re Dixon roundabout. Negatively affect the availability of GP and Dentist appointments.	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 (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 paragraphs 3.1.6, 6.4.7 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. 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 Dixon 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.	No change required.

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		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) of Policy HA4 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. 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 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. 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.	

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		The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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, allocated sites site-specific infrastructure requirements 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. 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. 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 will be required at 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	

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		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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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. Any air quality impact will be assessed as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole	

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		set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1175 / Paul Bezani / Objection	Concerns re water and sewage infrastructure and flood risk, and the resulting pollution and phosphate levels. Development will increase traffic and pollution, and the site is not well connected for pedestrian and cycle links. Environmentally sensitive, horseshoe bats, AONB, agricultural land loss and sensitive landscape character.	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 will be required at 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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application.	No change required.

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		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. 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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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.	

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		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) of Policy HA4 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. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'.	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1289 / Mr Charles Boase / Objection	The area proposed for development in Monmouth, at Leasbrook, adversely affects the shape and appearance of the town. Any largescale development should be to the south and west of Rockfield Road, where the landscape is better able to cope with it.	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 (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. 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	No change required.

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		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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
1581 / Richard Kitchen / Objection	This site is inappropriate due to its Environmental Sensitivity (including endangered Horseshoe Bats), Water Quality Risks and Traffic and Air Pollution.	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 will be required at 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. 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	No change required.

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		drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. 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. Any air quality impact will be assessed as part of the planning application process. 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) of Policy HA4 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.	

Rep No / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1671 / Mark Griffiths / Objection	The site has significant constraints. The access to the site floods and requires an emergency access. In close proximity to two special areas of conservation. Within the Lower Wye Valley landscape of historic interest. Will affect the Wye Valley Natural Landscape. In a remarkably conspicuous position. The Leasbrook site should be rescinded as the council incorrectly prevented the Drybridge farm site from being progressed.	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 (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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		It is not considered that the Council prevented the Drybridge Farm site from progressing. The Councils response on this matter are provided in the relevant section of the Report, including in relation to Soundness. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
1709 / James Duncan / Objection	Air Quality - no data available for air pollution in area of site. Idling traffic at peak times should be of concern re children at Monmouth Comprehensive and Little Einstein Day Care. Traffic entering or leaving HA4 will add to this pollution. Water Quality - objector states that the Drinking Water Inspectorate have issued 2 warnings re the quality of Monmouth's drinking water. Run off from the site will be above the extraction point for Monmouth's water supply. Treatment works improvements will benefit supplies downstream from Monmouth not Monmouth itself. Concerns re effectiveness of SuDS on heavy clay soils which prevail on this site. Flood Risk - water often seen running off the site, across the road and into houses whose drains are unable to carry the water away; what will the effect be if this site is built over? The site is within 1km of the SSSI Greater Horseshoe Bat roosting area and elimination of so much foraging and light pollution from this site will affect continuation of this habitat. Concerns re proximity to, and visibility from, the Wye Valley AONB, 2 Conservation Areas and the Dixon Mound Ancient Monument. Site	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon Road which will enable links to further active travel routes in Monmouth. Space within the site boundary	No change required.

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	designated as 'High/Medium' for landscape sensitivity in MCC's Landscape Sensitivity Report. Agricultural Quality of Land - objector states that the site is 80% Grade 2 and 20% Grade 3a. Concerns re the distance of the site from potential employment and shops requiring use of private car due to lack of safe active travel routes.	must also be included to allow provision of a future active travel route. This will be further considered as part of the planning application process. 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. 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 Dixon 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would	

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		need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		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) of Policy HA4 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. 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 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 HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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. 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. Policy LC4 includes a firm policy statement noting	

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		‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 is it 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. 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	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1810 / Jane Gray / Objection	Risk of flooding - site is partly within flood plain, lower section floods regularly. Increase in traffic will exacerbate delays joining the A40. Issues on the A40 already cause a bottleneck on Dixon Road. Unsuitable and unmaintained footpath, no cycle path nor space to include one and no safe crossing into the school. Area already failing re phosphate levels and failing water treatment plant. Improvements to water quality should be tested before increasing population as this site is upstream of the drinking water supply. Lack of public transport on Dixon Road and in Monmouth as a whole. Concerns re AONB, the scheduled monument of Dixon Mound and the core feeding grounds for the rare bats.	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 (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. 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 Dixon Road. Accordingly, a Flood Risk Compliance	No change required.

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		Note has been prepared for the site. Further detail will be considered as part of the planning application. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and	

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		in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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 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	

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		planning application stage. The IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency. 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. Policy LC4 Wye Valley National landscape (AONB) includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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.	

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		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) of Policy HA4 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. 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. The HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1826 / Kate Richards / Objection	This site has no associated employment land or nearby employment opportunities. Nearest cycle route is 2km away. Flooding and surface water runoff could be exacerbated by post build modifications to private homes outside of the LA's control. May contribute to phosphate loading in the river Wye. Raw sewage discharges occur even outside of flood conditions,	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,	No change required.

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	additional flows to treatment plant can only make this worse. Designation of the Wye as a SAC particularly important here. Site close to AONB, conservation areas, Dixon Castle and foraging grounds for protected species such as badgers, greater horseshoe bats and potentially hazel dormice. Objector notes concerns re survey data and timings, scientific bias and lack of requirement for an EIA. Concerns re vehicle access onto site and it's proximity to the A40 Trunk Road which will exacerbate existing traffic congestion and queuing along Dixon Road in both directions. The open fields currently provide a pleasing and rural vista on the approach to town.	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 (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. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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	

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		flooding in extreme events on Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that	

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		the development does not have a harmful impact on water quality in the River Wye. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The proposed development is set on the sloping hills to the north of Dixon 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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	

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		updated heritage impact assessment will be required to support any planning application on the site. 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) of Policy HA4 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. Separate requirements under other legislation including The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 will be required to ensure development is acceptable. To date an EIA Screening request (DM/2024/01250) has been submitted to Monmouthshire for a formal screening opinion to confirm if an Environmental Impact Assessment (EIA) is required in respect to development at the site. This screening opinion concluded that an Environmental Statement will be required for the site.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1856 / Paul Roberts / Objection	Issues concerning the traffic already impacting the roundabout onto the A40 and the additional 270 houses will only create more congestion and increase air pollution. The site only has one entry and exit point with no suitable cycling route into Monmouth. The proposed site will increase the risk of flooding with increasing runoff into the River Wye. Additionally, the development will cause increased risk to public health due to increased pollution and phosphates levels. The loss of agricultural land for the development will have a major impact on local wildlife, particularly endangered Greater Horseshoe Bats. Finally, the plans do not sufficiently consider impacts on public infrastructure (GP, Dentist, Schools)	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. Any air quality impact will be assessed as part of the planning application process. 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. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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	No change required.

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		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 Dixon 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. 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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. 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, allocated sites site-specific infrastructure requirements 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1857 / Tracey Roberts / Objection	Concerns re increased traffic from a site with a single point of access, causing both noise and pollution, adding to existing congestion on a road with car damaging potholes. Light pollution and visual impact on AONB. Water pollution from surface runoff affecting the river Wye. Flood risk as objector states SuDS do not work well on	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	No change required.

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	the site's heavy clay nature; Dixon Road partially floods due to run off from the site (see photographs attached). Obligation to protect biodiversity, land of historical interest, agricultural land and scenic beauty. Destruction of established hedgerow, wildlife corridors and feeding grounds for shrews, buzzards and swifts. Objector states the site is within 3km core sustenance zone of the Greater Horseshoe bats. Overstretched schools, doctors and dentists.	level of development to be acceptable in principle. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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 Dixon 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. 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	

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	

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		impact. This policy criterion also notes that less dense development should be provided on the northern and eastern edge of the site. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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. 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, allocated sites site-specific infrastructure requirements 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	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
1891 / Chris Hollick / Objection	States Dixon has serious environmental and practical issues. The number of houses will lead to at least another 400 cars with issues of pollution, traffic problems, impact on drinking water and River Wye water quality, water levels and flooding. The site is close to the river Wye and within the setting of the AONB and a Scheduled Ancient Monument. The area is historically sensitive and within range of rare bats. No good pedestrian or cycle access and homeowners would need to get a car to get around Monmouth. Concern over water runoff contributing to flooding and poor water quality. On a busy entrance to Monmouth where there are frequent traffic jams which will lead to more pollution and is close to the school. Prefers the CS0274 Wonastow Road site.	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 (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. The RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. 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	No change required.

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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 will be required at 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. 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	

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		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 Dixon 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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 Dixon 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) of Policy HA4 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. Comments on alternative sites are provided in the relevant section of the Report For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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2000 / Roger Langford / Objection	Development will damage the attraction of the town for visitors, we were told that the fields behind our house were part of a Site of Special Scientific interest, therefore wouldn't be developed. Notes concern over Bats and if they will be impacted. Not ideal land, good agricultural land. Additional traffic congestion, which is already bad, which would then lead to pollution. Poor public transportation.	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 (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. The fields that form the allocation are not designated as a Site of Special Scientific Interest. 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 Dixon 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) of Policy	No change required.

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		HA4 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. 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. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		planning application stage. The IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
2126 / Susan Thomas / Objection	Increased traffic, water pollution, phosphates, loss of prime agricultural land, active travel is very difficult, flooding at entrance of the site, AONB, greater Horseshoe Bat zone.	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 (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. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process.	No change required.

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. 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. 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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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	

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		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. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
2138 / Sarah-Jayne Byrne / Objection	Increase traffic and congestion, Air pollution - will not support the Council's objective around improving health and well-being. Lack of infrastructure - roads, bus services. Water pollution and 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.	No change required.

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	on River Wye and drinking water. Concerned that Monmouth will become a town with major pollution and environmental issues. Impact on habitat and biodiversity - there are Greater Horseshoe Bats in the area that use the land for their food. Flooding - the area is well known for flooding. The site is next to an area of historic interest and within the area of outstanding natural beauty, which would be impacted by the development. The Dixton land is also prime agricultural land and planning policy says these should be protected and other areas considered instead.	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. Any air quality impact will be assessed as part of the planning application process. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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.	

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		Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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.	

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		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 Dixon 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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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	

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		updated heritage impact assessment will be required to support any planning application on the site. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
2141 / Mandy James / Objection	Objection due to impact on environment with increased pollution in the River Wye, and its impact on the local wildlife which includes bats and owls that would be affected by the building works, habitat loss and light pollution. Furthermore, the development would increase flooding in an area that is already heavily impacted by drinking water contamination and maximum capacity sewage treatment and more housing would cause the system to fail. Finally, concerns regarding adding traffic to an already congested area.	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 (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. With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in	No change required.

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		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 Dixon 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) of Policy HA4 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. 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 Dixon 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	

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. In relation to 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
2612 / Susan White / Objection	The development of this land would have a significant detrimental impact on the environment, local infrastructure and community well-being. The rural landscape of Monmouth is an invaluable asset, the development of this particular site would ruin a unique landscape. Many species rely on this site as a feeding ground: Greater Horseshoe Bats; swifts and swallows; small mammals and pollinators, the developments would impact this detrimentally. Local infrastructure is ill-equipped to cope with the increase in population, traffic within the area is already bad, let alone with the additional homes, concerned that this development could bring harm to the children walking to the schools near to the site. limited local employment opportunities. In summary, this site's proximity to the river and the resulting impact on river health and our drinking water; the propensity to flooding; the traffic congestion and poor air quality; the loss of natural habitat all point to CS0270 being the wrong site to build.	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	No change required.

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		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. 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 Dixon 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) of Policy HA4 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. 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, allocated sites site-specific infrastructure requirements are set out within the individual site allocation policies and the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure	

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		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. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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. This will be further considered as part of the planning application process. 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	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3135 / Frances Kitchen / Objection	The site is inappropriate as it's environmentally sensitive being home to Greater Horseshoe Bats, forms part of Monmouth's historic landscape, lies within the AONB. Development here would disrupt habitats, impact scenic views, and use high-quality agricultural land. Concerns re water quality and drinking water increasing water run off and phosphate contamination in the River Wye, with proposed drainage solutions being insufficient. Increase in traffic and air	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.	No change required.

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	pollution, worsening congestion at Dixon roundabout. There is limited public transport and no train station in Monmouth.	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 Dixon 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) of Policy HA4 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. 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. 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	

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		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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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. Planning Policy Wales (2024) notes that where new housing is proposed developers, will be expected to provide community benefits which are reasonably	

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		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, allocated sites site-specific infrastructure requirements 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 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3215 / Jonathan (Jonty) Pearce / Objection	Concerns re quality of drinking water and pollutants from run off entering the water supply, increase of phosphate levels in the river Wye, storm overflows of raw sewage and upgrade to WW Treatment Work only affecting supply further downstream. Inadequate capacity in the sewerage network requiring developers to fund a Hydraulic Modelling Assessment, potential disruption from any sewer pipe upgrade required and subsequent costs reducing viability of the affordable housing. Concerns that SuDS do not work well on phosphate removal nor with heavy clay soils and flood zones within this site. Concern re existing traffic congestion and the potential worsening as well as out commuting causing an increase in CO2 and air pollution; no detailed traffic assessment carried out. Conflicts with policies ST1 and	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 (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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	No change required.

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	ST2 and triggers ISA concerns. Objector believes the ISA does not show HA4 as the preferable site. Active Travel on this site would be difficult. Concern re proximity to Greater and Lesser Horseshoe bats and loss of their habitat, sustenance zone, light pollution and affects on commuting routes. Site is within the landscape setting of the Wye Valley National Landscape (AONB) and within the setting of a Scheduled Monument. Site is Prime Agricultural Land and scores High/Medium for Landscape Sensitivity. The entrance to the site is in the flood zone and regularly floods. Access to Welsh Language education would require free school transport. Objector states that Monmouth Town Council have made it clear that CS0274 is the better site for Monmouth.	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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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	

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		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 drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. 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. Any air quality impact will be assessed as part of the planning application process. 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. This will be further considered as part of the planning application process. 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	

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		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) of Policy HA4 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. 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 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 HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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.	

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		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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. 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. 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	

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		on a site's delivery. Reflecting this approach, allocated sites site-specific infrastructure requirements 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. 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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3267 / Mr Neil O'Doherty / Support	Supports the development outline. The addition of affordable housing at 50% of the development is a critical and essential part of the proposal. The opportunity for people, including my children, to have access to a sensible supply of affordable homes is key to the long-term viability of our community. Thought must be given to supporting infrastructure in terms of health care provision (I note the application for permission for a new healthcare centre on Osbaston Lane) and it needs to be clear that this facility can support the addition population that will live on the development. Broadly speaking this looks like an additional population of c1000 people. That is good but what does it mean for schooling capacity? Also encourages the implementation of lights on the Dixon Roundabout - it is difficult to access the roundabout from Monmouth	Support welcomed. 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, allocated sites site-specific infrastructure requirements 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	No change required.

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	already without the traffic this site will generate.	Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole.	
3268 / Chris Goldsbrough / Objection	Development will result in reduction of Water Quality and increase in Pollution, worsen drinking Water Contamination. Surface Run-off Pollution, Phosphate Pollution, ineffectiveness of SuDS. Air Quality, air pollution: The area's current NO₂ levels already exceed WHO guidelines. Increased traffic and congestion, resulting in road safety hazards. Challenging active travel routes in this location. Concern over biodiversity and in particular the Greater Horseshoe Bat. Proximity to Wye Valley AONB: The site lies close to this protected landscape, conflicting with policy that discourages major developments near such areas. The Monmouthshire LLCA identifies the site as highly sensitive. Insufficient medical facilities, lack of school places, lack of well paid employment and flood risk as this site regularly floods.	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 (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. 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 Dixon 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	No change required.

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		drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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.	

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		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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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, allocated sites site-specific infrastructure requirements 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. 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	

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		Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3269 / Christine Voyce / Objection	Concerns re water infrastructure, site holds a substantial amount of water and would increase run off during construction and once complete, further contaminating drinking water quality. Concerns developers will opt to pay fines for not following environmental protections instead of implementing the correct infrastructure. Concerns re development's impact on greater horseshoe bat roost. This site has a far greater environmental impact than other sites identified.	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 (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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	No change required.

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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	

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		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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3270 / Caroline White / Objection	Concerns re Environmental Sensitivity including: impact on rare bat habitat, proximity to Wye Valley AONB, visibility from Dixon Mound, flooding risks and general climate and biodiversity issues. Water Quality and Pollution including: drinking water contamination, surface run-off pollution, phosphate pollution and ineffectiveness of SuDS. Traffic Congestion including: increased traffic, air pollution and active travel challenges.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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.	

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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. This will be further considered as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3271 / John Taylerson / Objection	Concern re water pollution as a result of the development, frequent storms in recent times in excess of local capacity with flooding and adding 270 homes would vastly increase contamination. Additionally, concern regarding the impact of development on environment and AONB with impact on local wildlife and states the site should remain grassland and grazing fields to capture carbon and improve capacity to hold water to reduce impacts of floods. Traffic also an issue with existing infrastructure insufficient and lack of active travel encouragement in Monmouth, development would cause significant pollution, congestion, and make the roads unsafe.	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 (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. 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. 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	No change required.

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		site must be suitably assessed in accordance with TAN15 including consideration of flooding in extreme events on Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would	

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		need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon Conservation	

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3272 / Alan Goldsbrough / Comment	Development will result in reduction of Water Quality and increase in Pollution, worsen drinking Water Contamination. Surface Run-off Pollution, Phosphate Pollution, ineffectiveness of SuDS. Air	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	No change required.

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	Quality, air pollution: The area's current NO₂ levels already exceed WHO guidelines. Increased traffic and congestion, resulting in road safety hazards. Challenging active travel routes in this location. Concern over biodiversity and in particular the Greater Horseshoe Bat. Proximity to Wye Valley AONB: The site lies close to this protected landscape, conflicting with policy that discourages major developments near such areas. The Monmouthshire LLCA identifies the site as highly sensitive. Insufficient medical facilities, lack of school places, lack of well paid employment and flood risk as this site regularly floods.	national planning policy, Land at Leasbrook (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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon Road which will enable	

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		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. This will be further considered as part of the planning application process. 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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage.	

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		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. 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, allocated sites site-specific infrastructure requirements 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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3274 / Justine Johnson / Objection	The site is within the AONB and tourists visit because of this and its amazing history. They do not want blots on the landscape when other sites are better such as Wonastow Road. Further development	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	No change required.

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	would trash Monmouth's history and charm. HA4 is on a prime agricultural location. This is short sighted vision for an ill thought-out gain.	national planning policy, Land at Leasbrook (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3275 / John Yapp / Objection	270 houses in Leasbrook would exacerbate concerns over the drinking water, and the pollution levels in the River Wye. Further compounding this is the flood risk at the site. Additionally, the Dixon Road entrance is restricted due to location on the A40 roundabout and more cars at the site will be highly problematic. Finally, the Dixon Road site's ecological value makes it a bad location for development.	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 (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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application.	No change required.

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye.	

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		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. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3277 / John Craig / Objection	Concerns over air pollution, traffic congestion, loss of prime agricultural land, loss of biodiversity and implication for Greater Horseshoe bats. Drinking water quality is poor with notices served on DCWW, flood concerns as soil type not suitable for SuDS and increase in runoff if developed. Site too close to AONB and local historical sites. No playground provision, limited job opportunities and increased traffic causing safety issues. Monmouth does not have large employers so any additional housing will incur out commuting. A new settlement should be developed instead with adequate infrastructure. More housing with any infrastructure improvements in unacceptable.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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 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	

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		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 Dixon 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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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, allocated sites site-specific infrastructure requirements 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. This includes consideration of recreation and open space requirements which notes a new neighbourhood play area and open space is to be provided on site, the exact level and type of provision will be determined as part of the masterplanning of the site at the planning application stage. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and,	

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		must be in accordance with the policy framework as a whole set out within the RLDP. With regard to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy does therefore not allow New Settlements to be considered as part of the LDP process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3287 / Robert Elliott / Objection	Development site on Green Fields and an important food source for Rare Horseshoe Bats. Rainwater likely to runoff into River Wye and contaminate local drinking water. Outside of walkable distance to shops, wary of increased traffic congestion as a result, increasing air pollution and further straining car parking.	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 (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. 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	No change required.

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		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. 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) of Policy HA4 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. 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	

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		drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. The County's car parks sit outside the scope of the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3288 / Janet Wall / Objection	Reject the principle of a new housing estate due to the presence of the endangered Horseshoe bat colony that use the site to feed, the current pollution levels already higher than permitted levels and the development and associated traffic would further increase this. In addition to pollution, adding traffic to an already congested area is not welcomed. Furthermore, the water run off from the site would make drinking water problems worse.	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 (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	No change required.

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		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. 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 Dixon 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) of Policy HA4 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. 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. Any air quality impact will be assessed as part of the planning application process.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3290 / C Reynolds / Objection	It is too close to the Wye Valley AONB. Concerns for the Greater Horseshoe Bat. Site is on prime agricultural land. Surface water run off is a concern into the River Wye. Drinking water concern. Level of pollution caused, particularly by the Dixon roundabout. Dixon road is severely congested. No active travel infrastructure. Parking concern. Safety of pedestrian users in the area. Doctors surgeries and schools are struggling with over subscription, not enough infrastructure.	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 (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. 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	No change required.

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		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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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) of Policy HA4 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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		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. Any air quality impact will be assessed as part of the planning application process. The County's car parks sit outside the scope of the RLDP. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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	

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		Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3291 / David Evans / Objection	Flooding is already bad, this development would worsen the area. Impact on traffic and congestions, notably key roundabouts would back up. Health concerns as a result of more emissions. High phosphate levels will be exacerbated as a result of development. Impact on green spaces. Lack of/strain on infrastructure.	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 (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. 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 Dixon 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)	No change required.

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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. Any air quality impact will be assessed as part of the planning application process.	

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		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, allocated sites site-specific infrastructure requirements 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3293 / J Wall / Objection	Run off of waste water will make the drinking water worse. An area of high polluted air which will be made worse. It is the gateway to Monmouth and an AONB. It uses agricultural land and it is used by Bats.	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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process.	No change required.

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		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. 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. 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	

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		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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3295 / Jo Thorp / Objection	Emergency access past our driveway and will have a direct impact. Strain on infrastructure which already over capacity. Traffic congestion. Impact on drinking water, rain runoff would contaminate the river Wye. SuDs drainage system poorly suited for phosphate removal. Environment impact on bats - within the sustenance zone. Negative landscape impact as close to the Wye Valley AONB and within a highly sensitive landscape area. The site includes prime agricultural land. Flooding concerns - about 15% of the site prone to flooding.	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 (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.	No change required.

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		Given that the entrance to the site is within an area of floodplain, the 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. 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. 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, allocated sites site-specific infrastructure requirements 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. 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	

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		flooding in extreme events on Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The	

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		development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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) of Policy HA4 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. 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	

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		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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3297 / Mr W T Phillips / Objection	Drainage system is inadequate, with surface water issues. Pollution issue and traffic congestion. Potholes in the area. Impact on wildlife in the area.	Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	No change required.

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		hydraulic capacity to accommodate the site. This information will be required at 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. 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. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3298 / Carol Reynolds / Objection	It is too close to the Wye Valley AONB. Concerns for the Greater Horseshoe Bat. Site is on prime agricultural land. Surface water run off is a concern into the River Wye. Drinking water concern. Level of pollution caused, particularly by the Dixon roundabout. Dixon road is severely congested. No active travel infrastructure. Parking concern. Safety of pedestrian users in the area. Doctors surgeries and schools are struggling with over subscription, not enough infrastructure.	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 (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. A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the	No change required.

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		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. 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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. 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	

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		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) of Policy HA4 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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		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. Any air quality impact will be assessed as part of the planning application process. The County's car parks sit outside the scope of the RLDP. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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	

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		Health Board in seeking to deliver service improvements in Monmouth and across the County as a whole. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3300 / Richard Thorp / Objection	Concerns re the emergency vehicle access and the potential impact of this development on the daily lives of the community. Following recent storms (see photos in full rep) it is clear the emergency route will be in use frequently in the future; it is a quiet single track lane and not suitable for the volume of traffic from the site, impacting noise levels and safety right outside our home. Local infrastructure is a key issue; healthcare services, dentists and schools are under pressure with some areas at or over capacity. Site offers minimal opportunities for local employment accessible by sustainable transport and has a lack of safe, accessible walking or cycling routes resulting in reliance on private vehicles. Traffic congestion is a pressing concern as the site could add an additional 400+ cars onto already congested roads exacerbating traffic issues and increasing air pollution. Adding 270 households to Monmouth's fragile water supply, which has received warnings from the Drinking Water Inspectorate, would put further strain on the drinking water supply. Planned upgrades will only benefit customers downstream and won't be completed until	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 (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. Given that the entrance to the site is within an area of floodplain, the 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. Any noise impact will also be assessed as part of the planning application process. A construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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	No change required.

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	2030. The sites clay soil, which results in regular flooding in the area, is not suitable for the SuDS system which is unlikely to mitigate phosphate runoff increasing pollution in the Wye and therefore Monmouth's drinking water. The site is in an environmentally sensitive area, encompassing the sustenance zone for the Greater Horseshoe Bat, is near the Wye Valley AONB and will visually impact the historic Dixon Mound and surrounding landscape. Site is prime agricultural land.	site must be suitably assessed in accordance with TAN15 including consideration of flooding in extreme events on Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. 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, allocated sites site-specific infrastructure requirements 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. 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	

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and	

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		in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. 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.	

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		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) of Policy HA4 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. 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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 is it 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 Dixon 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.	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3301 / Susan Read / Objection	Objects to HA4 noting the site has a lack of active travel/transport links. Suggests the site would worsen already bad traffic congestion, create more air pollution and increase water run-off. States there is a lack of infrastructure in this area generally, the site is Grade 2 farming land and environmentally sensitive. Suggests the RLDP needs a re-think.	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 (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. 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.	No change required.

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		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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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. 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, allocated sites site-specific infrastructure requirements 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.	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3302 / Andrew Burnett / Objection	Objections to the emergency access road' that will join the suggested new development on safety grounds. This access will not become an additional entry point for Hereford Road from the general population of a large housing estate.	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. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	No change required.
3303 / Anthony Brennan / Objection	This development will have a significant negative impact on the local community and environment. Site is too ecologically sensitive, zone for Greater Horseshoe bats which roost at Newton Court. The development is also located upstream of Welsh Water's extraction point in the River Wye for drinking water. This means any surface run-off from the proposed site is likely to pollute our drinking water.	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 (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	No change required.

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		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. 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) of Policy HA4 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. 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.	

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		Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water (DCWW) and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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.	
3304 / Daphne Smith / Objection	Very concerned with the development, as outlined by Gateway to Wales action group. Concerns being wildlife, loss of good agricultural land, surface water run-off, traffic tailback onto the A449 and Dixon roundabout, the historic significance of Dixon Mound. Also adds the following: schools are full, difficulty getting a doctor's appointment, sewage treatment plant is at capacity and parking in Monmouth is inadequate. Very concerned about the sustainable transport route as it will change the very nature of this quiet area.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. 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.	

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		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. Any air quality impact will be assessed as part of the planning application process. The County's car parks sit outside the scope of the RLDP. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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, allocated sites site-specific infrastructure requirements 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	

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3305 / David Greenhalgh / Objection	Exacerbate already severe congestion, more CO2 emissions. Gradient of the site makes it less than ideal for active travel. Should be carefully considered because of greater landscape impacts, especially because of the Wye Valley AONB. Impact on biodiversity, most notably Greater Horseshoe Bat population. A more preferable site is Wonastow. Concerns about proximity to the River due to surface water run-off and impact on water quality.	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 (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. 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. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage.	No change required.

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		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. 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) of Policy HA4 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. Comments on alternative sites are provided in the relevant section of the Report. With regard to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires	

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3306 / E J Brennan / Objection	Objects to Leasbrook development due to potential contamination of River Wye upstream from drinking water intake for Monmouth causing issue with Water Quality and Pollution. Environmental	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	No change required.

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	damage a concern with regard to wildlife and bat population at the site. Concerns re additional pressures on road network and congestion at Dixon roundabout and the pollution as a result of the cars.	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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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 Dixon 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) of Policy	

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		HA4 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. 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. Any air quality impact will be assessed as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3308 / Gary Hill / Objection	Will bring an increase in congestion on the already heavily congested Dixon Road, as well as an increase in pollution. The potential site access is sub-standard and unsuitable as an emergency access. Additional use of Priory Lane by emergency vehicles will make it extremely dangerous. More housing will bring additional contamination to the already polluted River Wye, River Wye drinking water source is under warnings from the Drinking Water Inspectorate. Site is prone to flooding. As well as Horseshoe Bats, there are also grass snakes, lizards, red legged partridges and the odd deer to be considered. Not many employment opportunities.	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 (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. 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	No change required.

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		planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. Given that the entrance to the site is within an area of floodplain, the 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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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,	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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	

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		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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3310 / Harriet Brennan / Objection	This site will have a devastating impact on the community and the local environment. Key concerns: exacerbated traffic congestion: near the Dixon Roundabout with a significant increase in traffic and longer journey times, increased air pollution and noise disturbance. Destruction of critical habitat: Located in the core sustenance zone for the endangered Great Horseshoe Bat with this vital habitat being destroyed. Contamination of water supply: location upstream of DCWW water extraction point poses a serious risk of water pollution. Surface water runoff from the development, carrying pollutants such as phosphates and potentially leading to costly water treatment measures. The Wonastow Road site presents a more suitable location, it is downstream of the water extraction point, on lower grade agricultural land, outside the core sustenance zone for Bats and within walking distance of employers.	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 (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. 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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be	No change required.

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		needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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 Dixon 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) of Policy HA4 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. 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.	

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		Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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	

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		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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3311 / Lynda Ord / Objection	Congestion on Dixon road is already significant so adding 270 houses is not viable, especially when considering air pollution levels that already exceed WHO guidelines.	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. Any air quality impact will be assessed as part of the planning application process.	No change required.
3313 / Peter Shaw Willington / Objection	Concerns as follows: the development in an elevated position is not in keeping with the rural town image and as a Gateway to Wales it projects the wrong image for a small town 'blot on the landscape'. It will be located at one of the busiest sections of the local road system, with Dixon roundabout being potentially hazardous and dangerous. The current issues will be exacerbated by additional traffic from the development. The section of road approaching the roundabout is often flooded after periods of heavy rainfall, how will this be dealt with if the current field of	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 (HA4) is considered to be a sustainably	No change required.

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	grass is replaced by tarmac and houses. Impact on the river Wye, with contamination being made worse. Concern about where inhabitants will find work locally, with commuting to other areas being likely which will contribute to more air pollution. The town does not have a railway station and bus services are not adequate. Concern about the capacity of primary and secondary school places. Existing medical services have not increased in line with the population, with surgeries under pressure to cope. Concludes that the Rockfield and Wonastow housing areas are better placed for further expansion. They are in close proximity to 2 industrial estates and excellent active travel to both work and town. The sites are not prominent and more environmentally acceptable. The 'legacy' sites have not been fully built out which could have addressed more of the 270 homes now being sought. Negative impact HA4 would have on the environment.	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. The housing supply components that contribute to meeting the housing provision figure include an allowance for existing commitments, windfall allowances, small site allowances such as conversions of unoccupied buildings and new allocations. In relation to the new housing allocations, approximately 2,130 homes are to be provided over the Plan period, 270 of which are to be delivered at the Leasbrook site (Policy HA4), with 50% of these being affordable (135 homes). Further information is set out in Strategic Policies S1, S2 and Table HA1-HA18 Residential Site Allocations, along with Appendix 7: Housing Supply Components and the supporting Housing Background Paper. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		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. Any air quality impact will be assessed as part of the planning application process. 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. 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 Dixon 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.	

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		Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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, allocated sites site-specific infrastructure requirements 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. 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.	

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		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. 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. Comments on alternative sites are provided in the relevant section of the Report. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	

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3314 / Sue Gaylard / Objection	Deep concern with the proposal. There will be a significant impact on the enjoyment of the town. Inevitable increase in traffic levels on Dixon Road which is a principal access to the A40. There is congestion here and the development will worsen this. Interrupted traffic increases pollution and will further degrade already poor air quality in the area. If Monmouth becomes more difficult to access, this will reduce visitor numbers for tourism and shopping. This will have a detrimental impact on the economic wellbeing of the town. Concern regarding the environmental impact as water quality is a concern and mitigation measures in similar circumstances have been ineffective. Even a small increase in pollution of the Wye upstream of the water extraction point can only worsen the standard quality of our drinking water. With the Monnow, Wye and Trothy in flood where is this water at the site of Dixon Road supposed to go? (Supporting video submitted).	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 (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. The RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. 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. Any air quality impact will be assessed as part of the planning application process. 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	No change required.

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3315 / David Thomas / Objection	Against the development due to impact on traffic with mass congestion expected as a result of the new estate as there is no rail service and limited bus services to compensate and as such, pollution levels will vastly increase. Leasbrook site is located far from the new Welsh Language primary school and should be closer such as the Wonastow Site. Concerns regarding the increased level of pollution in the River Wye as a result of the development, especially upriver of the drinking intake, and the impact of this on public health. Finally, objection to the development happening on food-producing agricultural land, with the site having 80% of Grade Two prime land that should not be developed on.	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. Any air quality impact will be assessed as part of the planning application process. 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. 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, allocated sites site-specific infrastructure requirements 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. This includes consideration of education	No change required.

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		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. 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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3334 / Mrs Brown / Objection	Not to build at all on this area it's totally unsuitable, as there is no infrastructure within the planned area or the town as a whole, e.g. Doctors Dentists public transport, adjacent to a very busy road.	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. Planning Policy Wales (2024) notes that where new housing is proposed developers, will be expected to provide community benefits which are reasonably	No change required.

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		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, allocated sites site-specific infrastructure requirements 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. 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. 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. 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.	

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3340 / Mrs Cheryl Cummings / Objection	HA4. Site is unsuitable for a host of reasons. Flooding, traffic congestion, blot on the Wye Valley AONB, 2000 metres to town, disruption to horseshoe bats, extra pollution by A40.	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 (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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	No change required.

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		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. Any air quality impact will be assessed as part of the planning application process. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3340 / Mrs Cheryl Cummings / Objection	Removal of Site HA4.	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 (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. It is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	No change required.

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3343 / Alexandra Hilu / Objection	Objection: Impact on Greater Horseshoe Bat habitat. Flaws in the HRA as the site should have been excluded due to the requirement for mitigation measures. Adverse impact on landscape and heritage with the site being highly visible from the Wye Valley AONB and within the setting of the scheduled monument Dixon Mound. Dark skies and light pollution impact. Water quality and pollution risks due to surface water run-off including on drinking water. Traffic congestion and pollution concern. Flooding and drainage impact. Prefers Wonastow Road site.	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 Dixon 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) of Policy HA4 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. 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 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	No change required.

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		policy and legislation, project level HRA will subsequently be undertaken to ensure that design and detail do not compromise the Protected Site. The HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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	

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		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 Dixon 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. 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. Any air quality impact will be assessed as part of the planning application process. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3346 / Susan Hughes / Objection	Reasons for objection: Increased traffic causing air pollution, drinking water contamination, surface run off pollution, phosphate pollution of the River Wye, ineffectiveness of SuDS on clay soil and a site poorly suited for phosphate removal. Detrimental impact on environment, nature, prime farmland, endangered Great Horseshoe Bat, risk of flooding, proximity of the Wye Valley AONB, deface the entrance to Wales and Monmouth.	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 (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.	No change required.

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		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. Any air quality impact will be assessed as part of the planning application process. 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised	

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		should infiltration not be suitable on the site and assessed via the separate SAB process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		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) of Policy HA4 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. 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. 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. Policy LC4 includes a firm policy statement noting	

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		‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3349 / M Frank Brehany / Objection	A detailed and comprehensive technical paper relating to air quality has been submitted (refer to full submission for further detail). This paper presents the representors opinions on Air Quality which arise from Traffic Emissions with a principle objective of highlighting flaws contained within the RLDP and also through the Local Air Quality Management – Technical Guidance document relating to the issue of Air Quality arising from Traffic Emissions in Monmouth.	The representor has provided an in depth paper relating to air quality in Monmouth as a whole, providing extensive detail on how air quality is monitored currently and disputes the methods used. The paper also includes a detailed critique on the Local Air Quality Management – Technical Guidance (TG22). It is understood that colleagues in the Environmental Health team have responded directly to the representor on these matters in separate correspondence. As air quality monitoring methods sit outside the scope of the RLDP/planning process it is not appropriate to comment on these concerns. In accordance with the Sustainable Transport Hierarchy, the RLDP 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. 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 traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also	No change required.

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		have to undertake a detailed Transport Assessment at the planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Policy PM2 of the RLDP relates to environmental amenity seeking to prevent development proposals that would result in an unacceptable risk or harm to local amenity including air pollution. Any air quality impact will be assessed as part of the planning application process including consideration of the need for an air quality impact assessment. A comparison of wording included in relation to other allocated sites policies is provided by the representor, this wording has been included in certain sites in relation to site specific matters for sites located close to existing Air Quality Management Areas or areas that have seen an increase in nitrogen dioxide close to objective levels that would trigger an AQMA. In relation to this area, the identified levels of nitrogen dioxide are well below the objective level and as a result an Air Quality Management Area has not been declared in Monmouth. Nonetheless, Strategic Policy S8 relates to all residential site allocations, this includes reference to residential amenity noting all sites should ‘incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate’. it is not therefore necessary to include specific reference in Policy HA4 as Strategic Policy S8 must also be considered. Air quality impact would be considered as part of any planning application as noted above. 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 along with other detailed assessments including via the Integrated Sustainability Appraisal (SA/SEA) and the Habitats Regulations Assessment. Further detail will be required at the planning application stage once the full detail of the site is known. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	

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3349 / Mr Frank Brehany / Objection	Refers to other principal areas of concern arising from the RLDP relating to drinking water quality (not related to phosphates), claims on demographics, claims of social housing achievability, public transportation and connectivity and the belief that business and employment will follow from the objectives within 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. 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 Deposit Plan allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites. 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 (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. The provision of affordable housing is a key priority of the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. 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 policy requirement to deliver 50% affordable housing 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.	No change required.

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		In accordance with Welsh Government guidance set out in the Development Plans Manual (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, which has informed the preparation of the RLDP. 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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. In accordance with the Sustainable Transport Hierarchy, the RLDP 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. 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. 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 Dixon Close and along Dixon Road which will enable links to further active travel routes in Monmouth. Space within the site boundary	

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		must also be included to allow provision of a future active travel route. This will be further considered as part of the planning application process. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. The IDP includes reference to active travel noting details are to be determined through Transport Assessment and masterplanning of the site. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues. The IDP also includes reference to financial contributions towards improved public transport and bus frequency. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3369 / Mr Dean Saunders / Objection	This development would cause dangerous amounts of traffic along a road that is severely congested. Only one pathway for pedestrians. Major implications on the local Doctors surgery. It is a beautiful area and the development will impact house value. It will not enhance the area at all, it will have a detrimental effect.	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 (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.	No change required.

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		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. 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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. 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.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3373 / Cass Kedward / Objection	Development would significantly impact the wildlife in the local area including bats, owls, hedgehogs, cuckoos, ducks, pheasants, woodpeckers, Rooks and a number of others. Ecological importance of the location makes it entirely unsuitable for building such a large amount of houses. Additional concern with the increase in flood risk in an already problematic area, and with the congestion with extra traffic from the development.	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 Dixon 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) of Policy HA4 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. 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 Dixon Road. Accordingly, a Flood Risk Compliance	No change required.

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		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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3380 / Miss Emily Gwilliam / Objection	More housing development will be a net negative benefit for Monmouth as a town as current schools, supermarkets, doctors, petrol stations, road networks are not enough to support current population. Concern re environmental impact and worsening flood risk with surface run off. Increase in emissions, light pollution, and land disturbance damaging conservation and habitats of local wildlife. Increased car emissions will damage wellbeing and contribute to diseases.	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 (HA4) is considered to be a sustainably	No change required.

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		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. 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, allocated sites site-specific infrastructure requirements 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. 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. 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. Any air quality impact will be assessed as part of the planning application process.	

Rep No / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

Rep No / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		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. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	

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3400 / Mrs Hayley Callicott / Objection	Rockfield and Leasbrook sites are flood plains that are needed for the environment. Concern regarding the strain on already struggling infrastructure in the town, especially social infrastructure (doctors, dentists, schools). Road network unsuitable for further development. Concerned re loss of green space and increase in pollution (noise and air), increase in traffic causing accidents. States infrastructure needed investment before more houses are built in order to support the population. Believes further development will detract from the beauty of the town. States active travel is a waste of resources.	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 (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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. Planning Policy Wales (2024) notes that where new housing is proposed developers, will be expected to provide community benefits which are reasonably	No change required.

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		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, allocated sites site-specific infrastructure requirements 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. 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. 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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution specifically, a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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 Dixon Close and along Dixon Road which will enable links to further active travel routes in Monmouth. Space within the site boundary	

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		must also be included to allow provision of a future active travel route. This will be further considered as part of the planning application process. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3411 / Charles Porter / Objection	Concerns re environmental impact including, increased pollution in the River Wye, rising CO2 levels cars related to the development, destruction of habitats as well as the loss of high grade agricultural land. Insufficient public transport including bus services and lack of railways. Net Zero will not sufficiently mitigate increase car use, road infrastructure around the site is not suitable to promote increased travel by foot and cycle and is dangerous and congested.	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 (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. 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 Dixon 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)	No change required.

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		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) of Policy HA4 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. 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. 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	

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3413 / Mrs L M Armstrong / Objection	Objections for the impact on Wye Valley AONB and the approach to Monmouth. The site is within 500m of the AONB and forms part of the buffer zone landscape. The loss of agricultural land, with 82%	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. Policy LC4 includes a firm policy statement noting	No change required.

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	being Grade II quality. Impact on Highways infrastructure with the development putting unsustainable pressure on the congested road network and increasing road safety risk. Surface water run-off and its proximity to the river Wye.	‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. 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. 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	

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		planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		hydraulic capacity to accommodate the site. This information will be required at 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. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3422 / Mairwen Harris / Objection	This site would have a negative impact on Endangered Species, inc. Greater Horseshoe Bat. The development is highly visible from the Area of Outstanding Natural Beauty (AONB) and would damage its aesthetic and cultural value. Runoff from the development threatens the already vulnerable River Wye. 15% of the site lies on a floodplain, with a history of flooding exacerbated by clay soil. Additional street lighting would increase light pollution. Loss of agricultural land. Increase in traffic and pollution, which is already bad. The site is poorly connected, with limited public transport and unsafe cycling routes. The proposed development conflicts with the goals of the RLDP, which emphasise protecting biodiversity,	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.	No change required.

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	enhancing well-being, and ensuring appropriate infrastructure. No provisions for schools/facilities.	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) of Policy HA4 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. 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 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 HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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 Dixon 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised	

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		should infiltration not be suitable on the site and assessed via the separate SAB process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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.	

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		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. Any air quality impact will be assessed as part of the planning application process. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3429 / Mrs Rhianon Lord / Objection	The proposed development poses significant risks to the environment, heritage and landscape, traffic and air quality, water quality concerns, active travel route safety and flooding (photos attached). In addition, school places due to insufficient places and GP appointments cannot be provided for	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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 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	

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		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 Dixon 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. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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	

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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.	

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		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, allocated sites site-specific infrastructure requirements 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. 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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3449 / Ashley Reid / Objection	Object for the following reasons: Water quality, traffic congestion, air pollution and Monmouth's rare bat populations.	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 (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.	No change required.

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3453 / Susan Smith / Objection	Objection: Ecology and the environment (colony of greater Horseshoe Bat), impact of lighting. Use of agricultural land (site is mostly Grade 2). Water quality (drinking water, risk of flooding and runoff water	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	No change required.

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	discharging into the River Wye). Traffic management and air quality. Wye Valley Landscape sensitivity with the need for a buffer to the AONB and it will be visible from the Dixon Mound scheduled monument.	national planning policy, Land at Leasbrook (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. 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 Dixon 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) of Policy HA4 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. 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	

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		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. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and	

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		in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3470 / Alison Powell / Objection	Reasons for objection: It will cause a huge amount of increased traffic, with a huge impact on Dixon Roundabout and Dixon Road (especially during rush hour). The development will cause more air pollution in the area. The site is close to the Wye Valley AONB which conflicts with planning policy. It is close to the scheduled monument, Dixon Mound. It is an area inhabited by endangered Greater Horseshoe Bats. The site is prone to flooding. Drinking water contamination, with the development having a bigger impact. More surface water running to the pollution rife River Wye. The Wyesham treatment works already discharges sewage into the River Wye.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. A Landscape Statement has been prepared for the site, with further detailed assessment to be undertaken in advance of the planning application stage.	No change required.

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		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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3471 / Anne Callicott / Objection	The drainage on the site is unsuitable for such a development, the development will result in increased flooding risks. Traffic congestion will increase. Lack of local jobs and infrastructure for the increase in population. Loss of good quality agricultural land. Impact on an area of natural beauty - the Wye Valley. This is also the immediate gateway to Wales.	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 (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. 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 Dixon 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.	No change required.

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		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. Any air quality impact will be assessed as part of the planning application process. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3472 / Andy Raynor / Objection	Concern re functionality of pedestrian/cycle/emergency access to HA4 from Hereford Road. Access onto Dixon Road unsuitable due to its proximity to a heavily used roundabout and the queuing and delays experienced. Submitted transport evidence is based on traffic flow data compiled in 2018; the full TIA should be called for at this stage. The survey should be undertaken during school term time and take note of queue lengths on Dixon Road and take account of the queues at the roundabout and the Wye bridge.	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. 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	No change required.
3476 / Angela Cooper / Objection	Issues concerning water quality with clay soil causing high levels of surface water runoff with increased impervious surfaces likely to exacerbate the problem leading to pollution of waterways. SUDS ineffective in	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	No change required.

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	clay soil, will impede water infiltration and failure in managing stormwater runoff. Sewer infrastructure insufficient to handle increased wastewater load from 270 homes and pose serious risk to public health and environment. Furthermore, development will exacerbate existing issues such as congestion and air quality. Concerns over environmental impacts from loss of farmland, habitat, and from flooding risks - local food production to fall, diminishing rural character and posing risk to rare bats at the site. Additionally, no active travel routes in place at the site to encourage commute into Monmouth.	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 Dixon 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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	

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		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. 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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3479 / Alistaire & Jo Ray / Objection	Concerns re Monmouth's infrastructure capacity for School, GPs and Roads for this level of development. Other concerns include; increased flood risk, traffic congestion and increased car ownership especially at Dixton roundabout, and damage to biodiversity and bat habitats.	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, allocated sites site-specific infrastructure requirements 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. 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. 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	No change required.

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		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 Dixon 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. 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 Dixon 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.	

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		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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3485 / Bridgid O'Hara / Objection	Concern re increased flood risk on and around the site and the increase in phosphate pollution this would cause in the Wye, also effecting drinking water and issue that cannot be mitigated by on site flood prevention and drainage solutions. Area has poor public transport increasing car use, air pollution and traffic congestion. Area is home to horseshoe bats which will leave once development starts. Concerns re loss of high-grade agricultural land and development would negatively impact on landscape and the gateway to Wales.	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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and	No change required.

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		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) of Policy HA4 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. 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. 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	

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		appropriately enable the authority to address concerns of impact on landscape character and visual amenity. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3488 / Catherine Duncan / Objection	HA4 site hosts many species of wildlife including deer, bird species, but of particular concern is the Greater Horseshoe Bat roosting place at Newton Court and serves as a foraging area for these bats. This is in direct contravention of the Environment (Wales) Act 2016 which states that 'Public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so promote the resilience of ecosystems'. The HA4 site is within 500 metres of the Wye Valley AONB and is highly visible from many particular key vantage points within the AONB, and is sandwiched between two conservation areas. Impact on traffic	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	No change required.

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	congestion and travel times, furthering impacting safety. Negative impact on drinking water and phosphates. Dixon Road is already prone to flooding. HA4 lies within the setting of the Ancient Monument with high visibility from the monument.	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) of Policy HA4 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. 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 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 HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	

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		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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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. 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. 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	

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3490 / Joan Hollick / Objection	The infrastructure is unable to cope with the current population. Schools have few places available, doctors waiting times are poor and difficulty finding dental care. The site is on high grade agricultural land and a habitat for wildlife and nesting buzzards in specimen trees. The impact on the Greater Horseshoe Bat. Ancient and protected burial ground within proximity of the site. Dixon roundabout is a traffic black spot, with regular traffic jams. There is no employment in Monmouth so commuters will exacerbate the problem. It is too far to walk into town so residents will use their cars. Extra parking will be needed. Entrance to Dixon Road floods and the development will increase this. The development will heighten the pollution and phosphates impacting the River Wye. The drinking water is under review. Monmouth depends on tourism. The present route is green and pleasant, with this being spoilt by houses proposed. The point to remember is that once the open	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 (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. The RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. 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, allocated sites site-specific infrastructure requirements 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	No change required.

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	countryside has been built upon it is lost forever.	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. 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. 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.	

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		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 Dixon 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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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	

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		updated heritage impact assessment will be required to support any planning application on the site. 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. Any air quality impact will be assessed as part of the planning application process. The County's car parks sit outside the scope of the RLDP. 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 Dixon 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.	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3507 / Mr Jak Dargie / Objection	Monmouth does not have the infrastructure for 270 additional homes. What is the strategy? The road system is failing with the current volume of traffic, with the development making this worse.	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,	No change required.

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		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 (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. 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.	
3542 / Mrs Pam Pearce / Objection	Concerned re Water Quality and Pollution with upgrades to Water Treatment works not due until 2030 and surface water runoff pollution from the site flowing into the River Wye upstream from the intake location. Proposed SuDS not effective for Phosphates issue with only 15-24% removed from a SuDs solution. Objects to scheme due to Traffic Congestion, with Dixon Road site only 100 metres from the roundabout. Additionally, air pollution at the site will increase significantly which is deemed unacceptable when considering distance to Monmouth Comprehensive School. Active Travel seen as difficult to	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 Dixon 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	No change required.

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	engage with at Dixton Road site due to distance to cycle route. Environmental Stability also a concern, site in close proximity to Rare Bat SSSI, home to endangered Greater and Lesser Horseshoe Bats and inside the 3km core sustenance zone (CSZ) and any development would remove feeding habitat, hedgerows, commuting lines, and increase artificial light. Also inside Wye Valley AONB and the 'Landscape Setting' and is highly visible, believes the site isn't an exceptional circumstance to allow major development inside the AONB with an alternate site available. Proximity to Dixton Mound also a concern, and its location on prime agricultural land. Finally, 15% of the site is in a flood zone and regularly floods.	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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon 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) of Policy	

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		HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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	

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		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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3559 / G Edmunds / Objection	With regards to the emergency access, this is not included within the red line for the candidate site. The emergency access has limitations in terms of visibility splays and likely to be detrimental to highway safety. The existing road is not constructed to current highways adoption standards. It is a private unadopted access road which residents have right of access. Any access could be used as a public road/footpath so bollards may be needed which will delay emergency vehicle access. Housing sites need to meet building regs - section 12 sets out specific requirements for vehicle access. The access may pose serious risk to health and safety of persons in and about buildings. Concern that construction traffic will use the emergency access and the resulting impact on Hereford road (noise/dust). Request feedback on the provision of the emergency access and its boundary. Moving on - Is there adequate infrastructure for foul/surface water disposal? The foul public sewer do not extend beyond the housing in Dixon Road with some having private drainage systems. Not aware of a water course in	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. 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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. The County's car parks sit outside the scope of the RLDP. 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.	No change required.

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	the vicinity capable of disposing surface water. Inadequacy of the towns foul water treatment works and its capacity for the new development. Do the schools have capacity? the parking in the town centre is restricted. how would access on Dixon Road be managed? The A40 can become gridlocked. Traffic impact assessments should be undertaken. Lack of highway maintenance and investment. It is visible from the AONB and the development should be reduced in size/scale.	Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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, allocated sites site-specific infrastructure requirements 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. 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.	

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		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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3560 / JM Cooke / P Cooke / Objection	Increase in vehicles, impact on wildlife, discourage visitors and tourism, ruin 'gateway to Monmouth' due to the amount of housing.	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 (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	No change required.

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		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 Dixton 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. The RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. 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. 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.	

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		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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3572 / Mrs Ashley Butler / Objection	Concern relevant and required bat surveys will not be carried out causing a detrimental impact on the bat SAC. How can appropriate mitigations be provided if no detailed surveys have been carried out?	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) of Policy HA4 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.	No change required.

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3616 / Mrs Emily Witham / Objection	Concerned about the negative impact on local infrastructure, particularly Dixon Roundabout. The need for an emergency access route onto Hereford Road show the potential issues. Hundreds of cars will significantly add to air pollution near to the secondary school. The farmland is a higher grade than the Wonastow Road site and WG guidelines state that lower-level farmland should be used first. The site is likely to increase traffic with people driving to the opposite side of town.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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	No change required.

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		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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3632 / Mr George RV Ashworth / Objection	The damage the site will cause is summarised in the MBLP relating to the high-quality landscape and entrance to Monmouth, new development would damage views and harm the setting of the town. The proposed layout provides for a curved but linear boundary which is out of character with the existing soft edge and setting of the town. The development site forms an important backdrop setting to the Dixon Conservation Area, especially when viewed from the Wye Valley National Landscape, and a backdrop to the Lower Wye Valley Landscape of Historic Interest and the Dixon Mound, of national importance as a well-preserved and important relic of the medieval landscape.	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	No change required.

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		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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3640 / Colin Chapman / Objection	Development would have a detrimental impact on the town. Development is too large for the area and would increase traffic, pollution and carbon emissions, specifically on Dixon Road. Monmouth is	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	No change required.

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	too far away from main employment areas such as Cardiff and Bristol. Development would put strain on overburden current infrastructure, increasing noise pollution and effecting public services. Concerns re environmental damage; it will destroy natural habitats, destroy the area and setting of the Wye Valley AONB, effect the Northern approach into Monmouth. Housing likely to be built will not be in keeping with the character of Monmouth town or the Dixon area.	confirms the dominant role of the primary settlement of Monmouth reflecting the range of services, facilities and sustainable transport available. It recognises that some of the lower tier settlements have a close geographical and functional relationship with higher tier settlement which have, therefore, been clustered together. The appraisal recognises the strong relationship between Monmouth and Wyesham therefore, Wyesham is grouped with Monmouth in the settlement hierarchy. 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 (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. 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	

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		level of development to be acceptable in principle. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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, allocated sites site-specific infrastructure requirements 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. 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	

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 is it 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.	

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		The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3642 / Craig & Sarah Wallace / Objection	Concerns development will bring extra traffic and pollution to an already congested area, especially during school run times. Concerns re increased phosphate pollution in the River Wye and increased flood risk, damaging an AONB. Concerns re loss of farmland and damaging habitats for Greater Horseshoe Bats.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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	No change required.

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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) of Policy HA4 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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3644 / Mr David Cantle / Objection	Concerns site isn't well connected to the town centre and will increase already existing traffic, congestion issues and increased air pollution especially at Dixon roundabout. Concerns that housing will not be affordable due to high house prices in the area. Concern that mitigation will not sufficiently compensate the lack of farmland used by horseshoe bats. Concerns developers will not provide promised infrastructure. Concern drainage	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,	No change required.

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	strategy will not be sufficient to prevent surface water run-off and increase phosphate pollution and that drainage and sewer infrastructure isn't adequately maintained, along with impact on flooding and drinking water. Concern re lack of infrastructure.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. The provision of affordable housing is a key priority of the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. 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 policy requirement to deliver 50% affordable housing 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. Appendix 12 of the RLDP - Glossary of Terms - provides a definition of affordable housing noting this is where there are secure mechanisms in place to ensure that such housing is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This definition is in line with the definition in national planning policy (Planning Policy Wales (2024)). With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in	

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		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 Dixon 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) of Policy HA4 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. 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, allocated sites site-specific infrastructure requirements 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.	

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		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 Dixon 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3645 / David Hing / Objection	Object to loss of farmland instead of utilising brownfield sites and the destruction of habitats and open spaces to meet government targets.	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 (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 paragraphs 3.1.6, 6.4.7 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. 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	No change required.

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		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. 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) of Policy HA4 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.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3647 / Deborah & Nick Edwards / Objection	Lack of consideration of privacy for affected residents including light and noise pollution. Site highly sensitive as near historical landscape and an AONB a protected landscape, conflicting with planning policy. Concern re Greater Horseshoe Bat and its loss of habitat, site is also prime agricultural land. Concerns re flooding including run off, phosphate pollution and drinking water contamination, sewage regularly discharges into the Wye and has caused stomach issues. Increase in traffic and congestion especially near Dixon roundabout increasing air pollution.	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	No change required.

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		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) of Policy HA4 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. 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	

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		policy, it is noted that most of the land surrounding Monmouth is of BMV status or floodplain. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		hydraulic capacity to accommodate the site. This information will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	

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3654 / Elizabeth Guy / Objection	The view into the town could be ruined by a new housing estate. They don't feel the town can cope with more houses without significant job creation and additional amenities. Objections being: Water quality - drinking water, surface water run-off, phosphates and sewers at capacity. Traffic congestion and pollution - The Dixon roundabout is congested at many parts of the day. Environmental concerns - Loss of high-grade farmland, a proportion of the site is prone to flooding and the site is close to the Wye Valley AONB. The impact on greater Horseshoe Bat.	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	No change required.

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		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 Dixon 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) of Policy HA4 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3655 / Elizabeth Lerner / Objection	The site is environmentally sensitive, traffic sensitive and historically sensitive. Concerns re loss of high-grade agricultural land, impact on drinking water source to surface water run off increasing pollutants in the Wye, increased traffic congestion and lack of school capacity. The site is also	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 (HA4) is considered to be a sustainably located edge of settlement site north of Dixon Road. Key facilities including	No change required.

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	within the landscape setting of the AONB and should be protected. Wants to be involved in future consultations.	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. 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 Dixon 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) of Policy HA4 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. 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.	

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		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. Any air quality impact will be assessed as part of the planning application process. 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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. 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.	

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. 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	

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		on a site's delivery. Reflecting this approach, allocated sites site-specific infrastructure requirements 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. 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3666 / George Martin / Objection	Main concern is the Bat population. The Dixon site is also close to the Wye Valley AONB and historical sites and would mean the loss of prime agricultural land. There are flooding issues at the site. There will be higher levels of river pollution, with surface water polluting the drinking water. Increased traffic congestion, with new residents restricted to car travel. Poor job opportunities in Dixon and no playground provision.	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 (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. 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	No change required.

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		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 Dixon 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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	

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		impact. This policy criterion also notes that less dense development should be provided on the northern and eastern edge of the site. 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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. 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. 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	

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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. This includes consideration of recreation and open space requirements which notes a new neighbourhood play area and open space is to be provided on site, the exact level and type of provision will be determined as part of the masterplanning of the site at the planning application stage. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and,	

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		must be in accordance with the policy framework as a whole set out within the RLDP. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3674 / Huw Williams / Objection	Concern over the access point on Dixon road due to a large oak tree, tree may become damaged or falling limbs could injure a user. Not enough details on the access and it is not clear how any safe pedestrian access point could be put in place. More congestion, causing safety issues. Impact on landscape, AONB and wildlife including bats and deer. Drinking water contamination is already an issue, development here is only going to be further exacerbated by the development of the site. Also has concerns of lack of local employment, increased demand on local services, increased flood risk, increased levels of air pollution, lack of public transport increasing the number of cars and congestion in central Monmouth, and therefore questions why this site has been chosen.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be	No change required.

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		further considered as part of the planning application process. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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.	

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		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) of Policy HA4 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. 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.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3675 / Ian Jones / Objection	Water Quality Concerns, including runoff pollution, SUDS Ineffectiveness, Sewer Capacity. Concerned over air quality and traffic congestion, increased traffic will result in higher levels of vehicle emissions and exacerbate existing congestion. The development would result in a loss of farmland, and poses a significant threat to local wildlife, including potentially impacting the habitat of rare bats. 15% of the site is prone to flooding. There is no active travel routes in place from this site into town.	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 Dixon 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.	No change required.

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		Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3678 / James Guy / Objection	Concerns regarding the water quality such as impact on drinking water, phosphates, sewers at capacity and sewage discharging into the River Wye and surface water run-off. Traffic congestion and pollution -	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	No change required.

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	further traffic issues and NO2 levels, with particular concern regarding the impact on Dixton Roundabout. Environmental concerns - loss of high-grade farmland, proportion of site is prone to flooding and it lies close to the Wye Valley AONB. The site threatens the loss of habitat for greater Horseshoe Bats.	national planning policy, Land at Leasbrook (HA4) is considered to be a sustainably located edge of settlement site north of Dixton 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 Dixton 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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. Dŵr Cymru Welsh Water (DCWW) have been engaged throughout the RLDP process and	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3687 / Jeremy Miles / Objection	States less homes needed not more to prevent climate change, understands many will be social housing but suggests local families will be at the back of the queue. Limited employment opportunities. Development will add pollution to the water supply, increase congestion on roads, loss of BMV, impact on landscape. States an alternative site should not be provided as enough people in Monmouth for the existing infrastructure. Concerned over potential social issues.	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 (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	No change required.

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		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 Dixton 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.. The provision of affordable housing is a key priority of the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. 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 policy requirement to deliver 50% affordable housing 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. 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. There are, however, exceptions where there is an overriding need such as homelessness, displacement such as refugees, and 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 only has control over the designation of affordable homes. The Council cannot control who purchases market homes. 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. 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	

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		development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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	

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		appropriately enable the authority to address concerns of impact on landscape character and visual amenity. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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, allocated sites site-specific infrastructure requirements 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3688 / Jess / Objection	Water Quality concerns, air quality and traffic congestion, environmental impacts, community impact / impact on quality of life, impact on human health,	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.	No change required.

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	ineffectiveness of SuDS and increased surface water runoff, sewer overflows,	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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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.	

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		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) of Policy HA4 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. 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.	

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		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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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,	

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		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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3689 / Jess Cooper / Objection	Significantly exacerbate existing traffic congestion on Dixon Road and surrounding areas. Increased Traffic - The development will generate a substantial increase in traffic. Congestion Impacts - This influx of vehicles will severely worsen existing traffic congestion, leading to increased journey times, increased air and water pollution, safety hazards due to increased traffic density and potential for accidents and reduced quality of life. They believe the potential negative impacts of this increased traffic significantly outweigh any potential benefits of the development. Environmental Impacts - result in the loss of valuable agricultural land, potential harm to wildlife, and increased pressure on local infrastructure. Loss of Agricultural Land - the development will result in the irreversible loss of valuable agricultural land, impacting local food production and	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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. 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. 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 Dixon Close and along Dixon Road which will enable	No change required.

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	contributing to the decline of rural landscapes. Habitat Destruction - the development will significantly impact local wildlife, including potentially damaging habitats for rare bat species. Flooding Risks - A portion of the site is prone to flooding, raising serious concerns about the long-term sustainability and safety of the development. Increased Surface Water Runoff - The development with its increased impervious surfaces (roads, driveways, roofs), will significantly increase surface water runoff. This runoff will carry pollutants such as oil, fertilizers, and other harmful chemicals into local waterways, potentially degrading water quality. Ineffectiveness of SUDS: The clay soil in the area is known to have poor drainage. Sustainable Drainage Systems (SUDS) may not be effective in managing the increased volume of stormwater runoff on this type of soil, potentially leading to increased pollution and flooding risks. Potential for Sewer Overflows: The existing sewer infrastructure may be insufficient to handle the increased wastewater load from 270 additional homes. This could lead to sewage overflows, posing a serious risk to public health and the environment.	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. This will be further considered as part of the planning application process. 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. 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.	

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		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) of Policy HA4 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. 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. The drainage destination document submitted for the site has identified a connection to a surface water body which is priority level 3 (surface water run off is discharged to a surface water body) within the SuDs standards. This will be utilised should infiltration not be suitable on the site and assessed via the separate SAB process. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and	

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		in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3691 / John Callicott / Objection	Objection: Blight on the natural landscape, cause significant ecological damage, significant blockage to drainage, run off	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,	No change required.

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	from the buildings will add to River Wye pollution, residents will commute which adds to pollution and traffic problems	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 (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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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) of Policy HA4 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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. This information will be required at 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. 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. Any air quality impact will be assessed as part of the planning application process. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3693 / John Goulding / Objection	How will the possible extra 400 cars, 500 or so children, 500 or so doctors' patients and	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	No change required.

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	all the extra requirements for clean and waste water be dealt with?	settlement hierarchy and having regard to the site search sequence outlined in national planning policy, Land at Leasbrook (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. 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. 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, allocated sites site-specific infrastructure requirements 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.	

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		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. 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 will be required at 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3694 / John Martin / Objection	Main worry is for the bat population. The Dixon site is just too close to an AONB and historical sites. Would mean loss of prime agricultural land. There are also flooding issues. And there would be higher levels of river pollution. The River Wye is Monmouth's water source and has already had two warnings from the Drinking Water Inspectorate. There would be increased traffic congestion and air pollution. New residents would probably be limited to car travel as opportunities for cycling and	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 (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	No change required.

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	walkers are limited. Not very good job opportunities.	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. 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) of Policy HA4 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. 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.	

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		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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 Dixon 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. 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.	

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		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 Dixon 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		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. Any air quality impact will be assessed as part of the planning application process. 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. This will be further considered as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3711 / Mark Morris / Objection	This area of the town has already seen flooding on the proposed fields in recent years. This area already suffers from large traffic issue with congestion on the dual carriageways which will also increase the traffic population for the residents that already live in this area of the town.	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. 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	No change required.

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		management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3726 / Pastor Michael Mortimer / Objection	This is prime agricultural land - used in spring by pregnant ewes and the rest of the year by beef fatstock. Yes we need more houses but we also need food. Build elsewhere.	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.	No change required.
3731 / Mr James Spreckley MRICS / Objection	The Council's own Candidate Sites Assessment Report 2024 recognises that the Land at Leasbrook has significant constraints, namely:-	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 (HA4) is considered to be a sustainably	No change required.

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	The site access floods, high/medium landscape sensitivity, close proximity to two Special Areas of Conservation, partly within the Lower Wye Valley Landscape of Historic Interest, It affects the setting of the nearby Wye Valley National Landscape, it lies in an extremely prominent position at the gateway to Wales and Monmouth. Refers to CS0099 as an alternative site.	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. 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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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	

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		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. 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 Dixon 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) of Policy HA4 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. 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 not to be read as adjacent to the Conservation Area. Dixon 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 is it separated	

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		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. It is not considered that the Council prevented the Drybridge Farm site from progressing. The Councils response on this matter are provided in the relevant section of the Report, including in relation to Soundness. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3758 / Mr Joseph Porter / Objection	Traffic congestion is appalling. An extra couple of hundred cars that will come as part of a new development will totally gridlock the area and further increase pollution which is already well above safe levels. It's not a safe route to school either the pavements are very narrow and the area floods very badly after a sustained period of rain fall. Surface run off containing more pollutants from cars, gritting, etc will only further pollute the already over polluted River Wye. There was a national article recently about how the Wye was dying and is not safe to swim in anymore due to high phosphate levels. There are not enough local high paid jobs so people will still need to use cars to commute as the public transport infrastructure to Monmouth is basically non-existent. This is also a beautiful part of Monmouth that on the edge of the AONB and an historic scheduled monument. The area supports natural wildlife and importantly the habitat of the Greater Horseshoe bats, this seems to be ignored,	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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	No change required.

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	agricultural land is higher grade than being told. I would like this to be removed from the plan.	linkages to and within the new development area. This includes key connections including a footpath link to Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. Dŵr	

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		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 will be required at 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. 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. Policy LC4 includes a firm policy statement noting ‘development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted’. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon Mound SAM. The site has subsequently been significantly reduced in	

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		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. 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) of Policy HA4 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. 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	

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		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. 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, allocated sites site-specific infrastructure requirements 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 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3767 / Mrs Pat M Price / Objection	Concerns of flooding on Dixon Road and development will increase run off, increasing pollution in the River Wye. More cars will cause traffic issues at Dixon roundabout and increase pollution.	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 Dixon Road. Accordingly, a Flood Risk Compliance Note has been prepared for the site. Further detail will be considered as part of the planning application.	No change required.

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. 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	

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		planning application stage. Welsh Government Highways consider the proposed level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3771 / Phillip Harris / Objection	Concerns re increase in traffic and car usage, especially due to the distance away of supermarkets, including congestion on Dixon Road and the roundabout, leading to more air pollution. Concerns re drainage and flood infrastructure including increased drinking water pollution with proposed drainage solutions not being suitable. Loss of habitat for greater horseshoe bats and feeding areas, hedgerow corridors and farmland. Site could also disturb scheduled ancient monument.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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 IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency.	No change required.

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		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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at the planning application stage.	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3776 / Richard Slater / Objection	Increase in traffic congestion and air pollution. Poor public transport. No provision/existing facilities cannot accommodate for more housing - schools, dentists, GPs.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process.	No change required.

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		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 IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency. 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, allocated sites site-specific infrastructure requirements 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3816 / Sabrina Entwistle / Objection	It is not a suitable site. This settlement is poorly connected and its existing connections are extremely vulnerable and increasingly more vulnerable with the	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	No change required.

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	impacts of climate change. Dixon roundabout is a pinch point. The new access and development is not acceptable as it will exacerbate and create new issues such as journey times and idling traffic which will reduce air quality. The only access point is next to a Zone 3 Flood risk from river flooding and feasible scenarios could see the road cutoff (Attached photos showing this). There is clear vulnerability from surface water flooding. During high rainfall, the highways drains become overwhelmed. Any impediment/delays to the Dixon roundabout will impact placement of businesses within Monmouth. New residents will be impeded by the lack of active travel in the area. Flood risk/suds - SuDs won't be appropriate when you consider the geomorphology and soil chemistry. It will raise phosphate levels in the river. It is within the River Wye SAC. Residential amenity - key issue is air quality. The localised pollution due to stationary traffic and its impact on people. Drinking water quality is an issue in Monmouth and the development will put further strain on the local water supply. GI/landscape and nature recovery - the site is on prime agricultural land and this needs to be preserved. It will cause harm to the AONB which is vital for the local economy. Loss of biodiversity and general squeeze of green spaces from urban creep. Particularly the greater horseshoe bat. Hold developers to account and make them carry out EIA.	settlement hierarchy and having regard to the site search sequence outlined in national planning policy, Land at Leasbrook (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. 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. Any air quality impact will be assessed as part of the planning application process. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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	

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	There is no designated employment near the development.	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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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	

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		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. 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 Dixon 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) of Policy HA4 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. Separate requirements under other legislation including The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 will be required to ensure development is acceptable. To date an EIA Screening request (DM/2024/01250) has been submitted to Monmouthshire for a formal screening opinion to confirm if an Environmental Impact Assessment (EIA) is required in	

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		respect to development at the site. This screening opinion concluded that an Environmental Statement will be required for the site. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3818 / Sally Williams / Objection	Would like the HA4 site to be reconsidered noting lack of infrastructure, having a negative impact on water, would directly impact the representors outlook, volume of traffic and congestion.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process.	No change required.

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		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, allocated sites site-specific infrastructure requirements 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. 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 will be required at 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3821 / Sarah Probert / Objection	Concerns re detrimental impact on the town. Object to access on Priory Lane as is dangerous for cars and pedestrians. How will Emergency Access be policed, could	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. Any planning applications on the site will be subject to public	No change required.

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	become a dangerous rat run and poses a threat to noise levels.	consultation and there will be an opportunity to comment on the detail at that stage. Any noise impact will also be assessed as part of the planning application process.	
3822 / Sarah Smith / Objection	Oppose HA4. State Monmouth does not have the level of infrastructure to support the volume of housing (school places, dentists, doctors). The sewage system is at capacity, with sewage discharged into the River Wye. Drinking water concerns. Traffic congestion and resulting air quality. Next to the Wye Valley AONB and the Monmouth burial mound. Impact on local wildlife such as Bats.	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 (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. 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, allocated sites site-specific infrastructure requirements 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.	No change required.

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		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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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	

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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. 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	

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		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 Dixon 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3823 / Sarah Withers / Objection	The site is inappropriate due to; environmental impacts such as loss of habitats and danger to bats, impact on view, proximity to AONB, impact on historic landscapes and the loss of agricultural land. Water quality risks, potential surface water run-off, increasing phosphate contamination and impact on drinking water. Increased car usage causing traffic and pollution. Lack of sufficient air quality monitoring.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		hydraulic capacity to accommodate the site. This information will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3825 / Scot Coton / Objection	Objects to site due to impact on drinking water supply, increased surface water run-off, impact on phosphate levels, flooding on site. Monmouth is a gateway to Wales, site would be visually prominent to all who travel into and out of Monmouth and	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 (HA4) is considered to be a sustainably	No change required.

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	Wales. Impact on traffic and congestion, noise impact. Impact on colony of bats including noise, loss of hedgerow, lighting. Prefers CS0274.	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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality and noise impact will be assessed as part of the planning application process. With regard to noise pollution a construction environmental management plan (CEMP) will likely be needed to control construction noise impact on existing nearby dwellings. This is a detailed matter that will also be determined at the planning application stage. With regard to ecological concerns, RLDP proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in	

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		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 Dixon 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) of Policy HA4 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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3828 / Mrs Sharon Gale / Objection	All aspects of the plan make this an unsuitable site. Please scrutinise developer's investigations and do not be incentivised to build on unsuitable sites. Dixon Road was recently spared flooding from Storm Bert due to the surface water which was cascading across the fields being absorbed by the bottom fields of the proposed site. If these fields are developed	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 (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	No change required.

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	surface water will pour onto Dixon Road and flood the houses along this main artery into town. Flood prevention measures will not be enough. Areas along Wonastow and Rockfield roads have drainage ditches and attenuation ponds but were still under water. Increased water run-off is likely to further contaminate the river Wye and the drinking water for Monmouth. The site is high grade agricultural land which sustains wildlife, helps to limit climate change and protects nature. The traffic network in Monmouth is chaos with stationary traffic adding to poor air quality; more cars will exacerbate this. Please protect the residents of Monmouth from this unsuitable and potentially destructive development.	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. 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 Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		there is no detriment to existing customers supply and that there is sufficient hydraulic capacity to accommodate the site. This information will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. 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	

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3832 / Sophie Smith / Objection	Concerns re impact on habitats, wildlife, AONB and loss of farmland. The pollution from extra cars, noise and litter, will clutter up our beautiful landscape and destroy its beauty. Increased phosphate pollution and its effects on quality of life. Concerns re increased strain on public services such as doctors, dentists and social care. Concerns the council doesn't care about the wellbeing of its locals.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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.	

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		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. 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. Any air quality impact will be assessed as part of the planning application process. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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	

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		hydraulic capacity to accommodate the site. This information will be required at 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. 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, allocated sites site-specific infrastructure requirements 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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3833 / Sophie Williams / Objection	Lack of infrastructure and amenities in proximity to the site in addition to large ecological issues with the site. Firstly, site is within CSZ for Greater Horseshoe Bats and	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	No change required.

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	would have significant impact on the species and vital grazing land. Additionally, development breaches Environment Wales Act 2016 through lack of enhancement of biodiversity and ecosystem resilience. It is currently 80% Grade 2 agricultural land that needs protection rather than development. The housing will mar views from AONB and setting of the Dixon Mound, contribute to light pollution and undermining dark skies efforts. Additionally, River Wye will likely be polluted and impact drinking water sourced from the river and runoff from the site would reduce quality. Air pollution concerns as a result of increase in traffic volume, additionally the lack of sufficient public transport forces the reliance on cars that ensures the increase in pollution through traffic congestion. Points that the RLDP contradicts goals to protect biodiversity, ecosystems and landscapes and further challenge development sustainability through inadequate infrastructure plans for schools, transport, and community facilities.	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 Dixon 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) of Policy HA4 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. 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 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 HRA addendum considers that the conservation status of local bat populations is unlikely to be adversely affected by the development of the HA4 Leasbrook site in	

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		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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The original Candidate Site submission related to a wider area directly adjacent to the Dixon 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. 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 Dixon Road. Accordingly, a Flood Risk Compliance	

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		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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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	

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		impacts to the River Wye SAC. Any development proposed will need to be in accordance with the Environmental Permit issued by NRW. 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. 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. Any air quality impact will be assessed as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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. This	

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		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. 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. Comments on alternative sites are provided in the relevant section of the Report. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3835 / Steve Gale / Objection	Concerned about amenity, and the environment, the land in question regularly has deer grazing on it and there are bats every evening that fly over it. The land is often waterlogged and this water will have to be displaced leading to more flooding issues in the Wye Valley. The levels of traffic congestion on the Dixon road are already high and again this proposed development would add to it.	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 Dixon 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) of Policy HA4 also refers to the requirement of a lighting scheme and dark corridors being	No change required.

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		maintained with particular regard to the Greater Horseshoe Bat Core Sustenance Zone (formerly Juvenile Sustenance Zone) and corridors used by bats. 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 Dixon 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. 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. Any air quality impact will be assessed as part of the planning application process. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed	

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		planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	
3845 / Mr Martin Sweeney / Objection	I am concerned that the proposed strategic housing site at Dixton in Monmouth (CS0270) will have a significant adverse effect on a rare and protected species, namely the greater horseshoe bat. Other concerns regarding impact on the wye valley national landscape and the very real concerns for flooding on what is a quite steep site leading towards the river Wye. The proposed development at CS0270 would also significantly extend the adopted settlement boundary of Monmouth. Proposed development is contrary to MCC's own policy on development in the open countryside (OC1 d). The proposed development would also be counter to the following policies referenced within the RLDP: Policy S5, Policy LC 4, Policy LC5, Policy NR1. I believe that the candidate site CS0270 should be ruled out due to the negative impact on the foraging grounds of the greater horseshoe bats.	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 (HA4) is considered to be a sustainably located edge of settlement site north of Dixton 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 Dixton 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. 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.	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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.	

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		The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3845 / Mr Martin Sweeney / Objection	HA4 has a number of significant concerns, related to its location within the 3km core sustenance zone of the greater horseshoe bats roosting at Newton Court (not the juvenile sustenance zone erroneously referred to in the document), as well as its detrimental impact on the setting of the Wye Valley national landscape, lack of employment sites in the immediate vicinity and the fact that it would represent a significant redrawing of the settlement boundary of Monmouth into the surrounding open countryside. All of these concerns are outlined earlier in my response. I believe that HA4 is the wrong site for this development and should be abandoned.	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 (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. 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	No change required.

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		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) of Policy HA4 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage.	

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		For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3866 / Mr and Mrs Hassell / Objection	It will lead to a substantial detrimental impact on Monmouth. Will contribute dramatically to traffic congestion with increasing air pollution and water pollution, with surface water run off into the river Wye. Wye is already suffering from drinking water quality and natural habitat impacted by pollution. Climate change and the existing flooding at the site impacting secure homes for the future.	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 (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. 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. Any air quality impact will be assessed as part of the planning application process. 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	No change required.

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		flooding in extreme events on Dixon 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The	

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		development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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) of Policy HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as an affordable housing-led development.	
3877 / Mrs O E Jones / Objection	It is a very large development which does not fit in with the area. Another piece of good farming land will disappear. It is a place for local wildlife (bats/dormice etc). Problems with water quality which has pollution difficulties as well as sewage	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 (HA4) is considered to be a sustainably	No change required.

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	works at capacity. Concern regarding flooding in the area, especially as it is a sloping site. Increase in traffic. It is not convenient to walk into town and carbon monoxide levels must already be high. Would the infrastructure be able to stand the impact? Schools would not cope or doctors surgeries. It would impact on the Wye Valley landscape. Where is the employment going for all this housing? Monmouth would become more of a commuter town.	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. 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. 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 Dixon Conservation	

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		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) of Policy HA4 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. 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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. Dŵr	

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		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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		ensuring such community benefits would not be unrealistic or unreasonably impact on a site's delivery. Reflecting this approach, allocated sites site-specific infrastructure requirements 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. 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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3904 / Mr Peter Garwood / Objection	Building here is not a sensible idea as the run off will cause flooding in areas below the development area. It is not ideal for development.	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 Dixon 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.	No change required.
3928 / Dr Robert Handley / Objection	It is counter to the sustainable transport policy (S3) to ensure development proposals are located and designated to reduce the need to travel and promote a shift away from the private car. The north end of the site is far further than desirable for an 'active travel' policy. The proposed pedestrian routes to Hereford Road require cyclists to use the narrow and busy Dixon road, where traffic lights at the junction already congested.	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 (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.	No change required.

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		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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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, allocated sites site-specific infrastructure requirements 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. The IDP includes reference to active travel noting details are to be determined through Transport Assessment and masterplanning of the site. Internal layout and active travel routes within the site will be determined at the planning application stage in collaboration with active travel colleagues.	
3963 / Mr Stephen Lewis / Objection	The site is a visual blot at the Gateway to the Wye Valley. Adjacent to a current flood risk area. This field has flooded due to excessive water runoff. Partially collapsed land drain that will allow unfettered runoff access to the River Wye. Already excessively high phosphate levels will be increased at a point in the River Wye that is above the water extraction point for Monmouth. Increased traffic movement	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 (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	No change required.

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	and congestion. This will raise emissions. Flawed premise of active travel advantages as a damaged Dixon Road where a single side pavement already restricts traffic flow, car parking and safe shared transit routes. Compromised wildlife habitats of rare bats and deer.	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. 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. Policy LC4 includes a firm policy statement noting 'development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted'. 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. 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 Dixon 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	

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		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. Appendix 8 of the RLDP sets out the Infrastructure Delivery Plan (IDP) which 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. 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 will be required at 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. Regarding concerns in relation to drinking water quality, any water extraction from the River Wye would be managed by Dŵr Cymru Welsh Water and NRW and would need to be conducted in accordance with water quality regulations. The development would be conducted in accordance with NRW Planning guidance and in accordance with the environmental permits issued by NRW to ensure that the development does not have a harmful impact on water quality in the River Wye. The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also	

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		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. Any air quality impact will be assessed as part of the planning application process. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. 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 Dixon 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) of Policy	

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		HA4 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
3968 / Mr Steve Vickers / Objection	This location is profoundly unsuitable for additional housing due to its proximity to the A40 Dixon Roundabout and Monmouth Comprehensive School. There will be failure in Well-being, both residents of Monmouth and all that travel along the A40. There will be secondary adverse impacts on the town and businesses of Monmouth from the increased traffic queues, especially at peak morning and afternoon times. There is no evidence of community engagement for this location. There is no evidence of any modelling for impact of this site, nor assessment of impact on surface water run off (recent events suggest that location stores a significant amount of run off. There appears to be a preference for developments alongside major transport routes where access is via significant junctions (look at M5 south of Bristol). This would indicate locations around Usk & Raglan interchanges may be options to explore.	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 Monmouth reflecting the range of services, facilities and sustainable transport available. It recognises that some of the lower tier settlements have a close geographical and functional relationship with higher tier settlement which have, therefore, been clustered together. The appraisal recognises the strong relationship between Monmouth and Wyesham therefore, Wyesham is grouped with Monmouth in the settlement hierarchy. 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 (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	No change required.

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		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. 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. Any air quality impact will be assessed as part of the planning application process. 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. The detailed design of the site will be presented as part of the planning application process. Any future planning applications on the site will be subject to detailed planning considerations and, must be in accordance with the policy framework as a whole set out within the RLDP. Any planning applications on the site will be subject to public consultation and there will be an opportunity to comment on the detail at that stage. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	

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3971 / Miss Sue Netherway / Objection	Strongly objects to the plan to build houses on prime agricultural land. Main objection the additional traffic on Dixon Road and roundabout in particular suggesting this would be disastrous. Only one entrance. State it is claimed people living there would walk into town but they wouldn't.	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 (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. 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. 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	No change required.

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		level of development to be acceptable in principle. Any air quality impact will be assessed as part of the planning application process. 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 IDP and Policy HA4 sets out the requirement for financial contributions towards improved public transport and bus frequency. 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. 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 Dixon Close and along Dixon 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. This will be further considered as part of the planning application process. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	
4008 / Pat Phillips / Objection	The area is prone to flooding. The River Wye is in a terrible position. The pollution and traffic congestion caused by more road users. The wildlife will be greatly effected. Not enough doctors in Monmouth, with no hospital close by. Very poor bus service and no railway.	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 (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	No change required.

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		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. 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 Dixon 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. 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. Any air quality impact will be assessed as part of the planning application process. 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	

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		Assessment, and also includes specific reference to junction mitigation/improvement measures and a public transport link if necessary. 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) of Policy HA4 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. 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, allocated sites site-specific infrastructure requirements 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	

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		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. 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. 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. For the reasons noted above it is considered that Land at Leasbrook (Policy HA4) is suitable for allocation in the RLDP as a sustainably located affordable housing-led development.	