



Monmouthshire Replacement Local Development Plan

2018-2033

Report Of Consultation: Appendix 12
Deposit RLDP Representation Responses

Volume 16 – Minerals & Waste

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Minerals

Strategic Policy S16 – Sustainable Minerals Management

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1196 / Torfaen County Borough Council / Support	Paragraph 22.1.4 - As investigations in Blaenau Gwent, Newport and Torfaen progress regarding meeting their individual SWRAWP Regional Technical Statement 2nd Review (RTS2) crushed rock apportionments (as amended) - none of which are currently resolved, Torfaen will continue to work with Monmouthshire and our neighbouring LPAs on updating the 'Former Gwent Statement of Sub-Regional Collaboration: Position Statement', September 2024. However, it is recognised that Monmouthshire can meet its own RTS2 'Carboniferous Limestone' apportionment.	Comments noted and the commitment towards the ongoing collaboration on the 'Former Gwent Statement of Sub-Regional Collaboration: Position Statement is welcomed.	No change required.
1356 / Welsh Government / Support	The second review of the Regional Technical Statement (RTS2) has been endorsed by MCC and identifies that no allocations are required in the plan period for crushed rock or sand and gravel. This is reflected in Policy S16. It is a requirement of the RTS2 for all authorities to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production in the Former Gwent sub-region, which also includes the authorities of Newport, Torfaen and Blaenau Gwent. The Former Gwent SSRC - Position Statement has been	Welsh Government's support for the approach taken towards preparing the Former Gwent Statement of Sub-Regional Collaboration: Position Statement is welcomed.	No change required.

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	prepared. In summary, the position statement concludes that it is not possible at this stage to establish what the sub-regional shortfall is and how it can be met until relevant planning applications/candidate site submissions in Blaenau Gwent and Torfaen are determined. The Council consider the situation will continue to be monitored and the Position Statement will be updated as necessary. The Welsh Government supports this approach.		
1803 / Councillor Dr Louise Brown / Comment	"won" used twice not clear what it means?	The term 'land won' resources is a commonly used term in the context of mineral reserves and refers to mineral resources that come from the land.	No change required.
3118 / Councillor Meirion Howells / Support	I support that the Council will sustainably manage its mineral resources.	Support welcomed.	No change required.
1819 / Minerals Products Association / Objection	Disappointing that the requirement for a Statement of Sub-Regional Collaboration (SSRC) hasn't been prepared despite it being a requirement of the RTS2. The concluding statement in section 4.3 of the Background Paper regarding the LPAs in the Former Gwent Sub-Region not being in a position to confirm how regional apportionment figures will be met is unacceptable.	The Mineral Planning Authorities (MPAs) that make up the Former Gwent Sub-Region have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC), however, it has not been possible at this stage to confirm how the regional apportionment figures will be met due to specific ongoing circumstances that are referenced in the Position Statement, such as the outcome of planning applications and candidate site submissions in the sub-region. These influence the sub-region's ability to establish what the shortfall is, making it premature to approach other authorities. The preparation of a Position Statement, to be monitored and updated as circumstances change, was therefore seen as a pragmatic way forward. This approach has been supported by Welsh Government in its representations on the Deposit RLDP.	Minerals Background Paper has been updated to include an updated version of the Statement of Sub-Regional Collaboration: Position Statement to reflect the latest position with regards to the consideration of minerals related planning applications and candidate site assessments in the

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		The SSRC: Position Statement has, however, been updated to reflect updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix.	Minerals Planning Authorities making up the Former Gwent Sub-Region (Blaenau Gwent CBC, Torfaen CBC, Newport CC and MCC).
1819 / Minerals Products Association / Objection	Paragraph 22.1.3 refers to 11.25Mt permitted reserves at Ifton Quarry. Understand that a significant proportion of these reserves lie below the water table. This is confirmed in the Minerals Background Paper in paragraph 3.9 of the Background Paper. The consequences of this constraint are not considered in the Plan or in the Background Paper. Whilst our previous comments on production capacity within Monmouthshire have been overlooked, so has the potential consequence of the potential constraints on this reserve.	Minerals Technical Advice Note (MTAN) 1: Aggregates (March 2004), requires the preparation of Regional Technical Statements (RTSs) to ensure that an adequate supply of primary aggregates can be maintained. RTS2 was published in 2020 and forms the basis of Monmouthshire's apportionment and RLDP allocation requirements. Consistent with the commentary in Appendix B of the RTS2, paragraph 3.9 of the Minerals Background Paper references the extensive unworked resources of carboniferous limestone in Monmouthshire. Both documents also note that most of the resources, fall primarily within areas of relatively low environmental capacity and much lies beneath the water table within a principal aquifer. The conclusions of the RTS2 were made with reference to this situation. This concludes that no further allocations for future workings are specifically required to be identified within the RLDP. The RLDP is therefore consistent with the recommendations of the RTS2 document.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.
1965 / Monmouthshire Housing Association (MHA) / Support	In principle, MHA support the mineral and waste policies.	Support welcomed.	No change required.
3319 / Nr A Andrew Hubert	So far it works but it won't if current plans are put into effect.	Comments noted.	No change required.

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von Staufer / Support			
3340 / Mrs Cheryl Cummings / Support	No comment provided.	Support welcomed.	No change required.
3436 / Mr Christopher Banner / Support	Where is this policy?	All policies are set out in the Deposit Replacement Local Development Plan, which was available to view during the consultation period online, at County Hall, Usk, at all of the Council's hubs and at all of the drop-in sessions arranged throughout the County.	No change required.
3828 / Mrs Sharon Gale / Objection	Drinking water comes from the Wye. It's already very polluted, let's not make it worse.	Policy S16 provides the overarching policy approach towards the sustainable management of mineral reserves in the County. The RLDP does, however, provide the policy framework to protect water sources and the water environment through Policy NR3 - Protection of Water Sources and the Water Environment.	No change required.
3853 / Mrs Melanie Nicholas / Objection	Not fair at this time.	It is not clear from the comment what aspect of the RLDP the representor would like to address. Therefore, the Council is unable to respond to this representation and there are no suggested changes to the policy.	No change required.
3886 / Mrs Nerys Wilson / Comment	Any mineral extraction or waste disposal should be strictly regulated to prevent disruption to Shirenewton's character.	A large area of land to the south of Shirenewton is safeguarded as a Minerals Safeguarded Area as limestone resources have been identified on the British Geological Survey Maps. In accordance with Planning Policy Wales (PPW), the Local Planning Authority (LPA) is required to safeguard this land as a mineral resource. Any proposals to extract minerals would be considered against all relevant policies of the RLDP, including those relevant to any potential impact on Shirenewton's character. As noted in paragraph 22.3.3. of the RLDP, the extraction of mineral resources will generally not be acceptable within 200m of identified settlements in the RLDP for hardrock reserves, such as limestone.	No change required.
3924 / Mr Richard Dobbin / Objection	Little is written regarding these policies and certainly nothing tangible.	Section 22 of the Deposit RLDP sets out Minerals related policies as required by national guidance set out in Planning Policy Wales.	No change required.

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3980 / Mr Thomas Hooper / Objection	Too much to type.	It is not clear from the comment what the representor would like to address. Therefore, the Council is unable to respond to this representation and there are no suggested changes to the policy.	No change required.
3989 / Miss Tracey Meaker / Objection	Who knows what you might find - coal mines?	The Coal Authority has been consulted on the Deposit RLDP and has responded that its records do not indicate the presence of any coal mining features within the Monmouthshire area.	No change required.

Policy M1 – Local Building and Walling Stone

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1819 / Minerals Products Association / Objection	We support the wording of Policy M1, however, the final sentence of paragraph 22.2.1 should be deleted. It is unclear how material could be removed from sites without the use of heavy vehicles.	Support for Policy M1 is welcomed. Reference to the use of heavy vehicles at the end of paragraph 22.2.1 is within the context of the small-scale nature of the proposals covered by Policy M1 - Local Building and Walling Stone. Within this context, it is considered appropriate to have regard to the scale of vehicles required to facilitate small-scale quarries to ensure they are commensurate with smaller scale operations.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.
3886 / Mrs Nerys Wilson / Comment	The extraction of minerals in or near Shirenewton should be avoided as it could cause long-term damage to the local environment and heritage. If mineral extraction is necessary elsewhere, mitigation measures should be implemented to minimise noise, traffic and ecological impact, ensuring that these activities do not degrade the visual or environmental quality of the area.	A large area of land to the south of Shirenewton is safeguarded as a Minerals Safeguarded Area as limestone resources have been identified on the British Geological Survey maps. In accordance with Planning Policy Wales (PPW) the Local Planning Authority (LPA) is required to safeguard this land as a mineral resource. Any proposals to extract minerals would be considered against all relevant policies of the RLDP, including those covering the concerns raised such as heritage impact, ecological impact and the environmental quality of the area. As noted in paragraph 22.3.3 of the Deposit RLDP, the extraction of mineral resources will generally not be acceptable within 200m of identified settlements in the RLDP for hardrock reserves such as limestone.	No change required.

Policy M2 – Minerals Safeguarding Areas

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	Remove i) as what might not be able to be commercially extracted today may well change tomorrow with new technologies. The policy provides weak protection for safeguarding minerals.	Criterion (i) references the need to consider if extraction would be commercially viable in the future as well as the present day and therefore allows for the consideration of new technologies.	No change required.
1819 / Minerals Products Association / Objection	Generally supportive of the safeguarding policy, however, question the need for the second part of subsection i) "or that it would cause unacceptable harm to ecological or other interests". The likelihood is that the permanent development would also impact upon these interests. These interests are addressed in other policies in the plan. This should therefore be deleted. We would also suggest deletion of the opening text in 22.3.2 "In most instances". This does not add anything to the paragraph and may be factually incorrect.	General support for policy is welcomed. Reference to unacceptable harm to ecological or other interests in criterion a)i) in Policy M2 is written in the context that ecological impacts or other interests may be a reason as to why mineral extraction may not take place, therefore allowing the consideration for other development proposals in a Mineral Safeguarded Area. The inclusion of this text in Policy M2 is therefore considered appropriate in this context. With regard to the opening text to paragraph 22.3.2 "In most instances", it is acknowledged that this may not always be the case and therefore it is agreed that the text should be deleted from the Plan.	Delete the following text from the start of paragraph 22.3.2 "In most instances".
3168 / Roadchef Motorways Limited / Objection	The wording of the policy should reflect that safeguarding is not to prevent development but to ensure that the presence of the resource is taken into account.	In accordance with Planning Policy Wales (PPW), the purpose of policy M2 is to prevent the sterilisation of mineral reserves by other forms of development. In this respect, there could be instances where the presence of mineral reserves prevents development if the proposed development fails to satisfy the requirements of Policy M2. Paragraph 22.3.2 does however, clarify that development may proceed within safeguarded areas as long as developers demonstrate the resource in question is either of poor quality/quantity and would not be economical to exploit, or the nature of the development in question would not prejudice exploitation of the resource.	No change required.

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3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.
1383 / Taylor Wimpey / Objection	Question the appropriateness of the minerals safeguarding areas. Object to the inclusion of CS0078 within the Minerals Safeguarding Area identified in Policy M2 and the proposals map. Note due to the proximity to the settlement boundary and other committed development it would never be extracted. Given CS0078 is immediately adjoining the proposed settlement boundary for Monmouth, then it is considered that the resource is constrained by sensitive development and extraction would have an unacceptable impact on the environment and have significant amenity considerations. It is considered that any extraction would be unfavourable due to its location.	Planning Policy Wales (PPW) states that using the National Resource Maps and the National Aggregates Safeguarding Maps, areas to be safeguarded should be identified on the proposals maps. Accordingly, the RLDP Proposals Map safeguards Category 1 minerals reserves set out in the British Geological Survey (BGS) maps. PPW also states at paragraph 5.14.7 that safeguarding does not indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered. Paragraph 22.3.3 of the Deposit Plan clarifies that the extraction of mineral resources will generally not be acceptable within 200m of identified settlements in the RLDP for hard rock and within 100m for sand and gravel. This is consistent with Welsh Government Guidance set out in Minerals Technical Advice Note (MTAN)1: Aggregates (March 2004). CS0078 – Land Adjacent to Croft Y Bwla, is within a Minerals Safeguarded Area for Category 1 Sand and Gravel reserves but it is recognised that it also adjoins the settlement boundary of Monmouth and is, therefore, within the 100m buffer zone set out in MTAN1.	No change required.
3886 / Mrs Nerys Wilson / Comment	The extraction of minerals in or near Shirenewton should be avoided as it could cause long-term damage to the local environment and heritage. If mineral extraction is necessary elsewhere, mitigation measures should be implemented to minimise noise, traffic and ecological impact, ensuring that these activities do not degrade the visual or environmental quality of the area.	A large area of land to the south of Shirenewton, sweeping across the south of the County is safeguarded as a Minerals Safeguarded Area as limestone resources have been identified on the British Geological Survey maps. In accordance with Planning Policy Wales (PPW) the Local Planning Authority is required to safeguard this land as a mineral resource in the RLDP. Any proposals to extract mineral resources would be considered against all relevant policies of the RLDP, including those covering the concerns raised such as heritage impact, ecological impact and the environmental quality of the area. As noted in paragraph 22.3.3 of the RLDP, the extraction of mineral resources will generally not be acceptable within 200m of identified settlements in the RLDP for hardrock reserves such as limestone.	No change required.

Policy M3 – Mineral Site Buffer Zones

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1819 / Minerals Products Association / Objection	This policy is confusing separation distances and buffer zones. The buffer zone to be identified on the Proposals Map is drawn outwards from permitted or allocated mineral sites. The policy should say simply that no new sensitive development will be permitted within the minerals buffer zones identified on the Proposals Map. Para 22.4.1: the reference to preventing 'encroachment towards sensitive land uses' should be removed, firstly because Buffer Zones are drawn around minerals sites, not around sensitive development, and secondly because the reference should be to sensitive development (as stated in the paragraph), not to ' <i>sensitive land uses</i> '.	Paragraph 22.4.1 is consistent with the wording of MTAN1, paragraph 70, which notes that development plans are required to indicate the boundary of the buffer zone and that within the buffer zone, no new sensitive development or mineral extraction should be approved. Paragraph 71 goes on to reference the establishment of a separation distance between potentially conflicting land uses. On this basis, paragraph 22.41. is considered to be consistent with the wording of MTAN1 and no changes are therefore considered necessary.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcome.	No change required.
3886 / Mrs Nerys Wilson / Comment	The extraction of minerals in or near Shirenewton should be avoided as it could cause long-term damage to the local environment and heritage. If mineral extraction is necessary elsewhere, mitigation measures should be implemented to minimise noise, traffic and ecological impact, ensuring that these activities do not degrade the visual or environmental quality of the area.	Policy M3 relates to the Mineral Buffer Zone identified on the Proposals Maps around Ifton Quarry and is a requirement of Planning Policy Wales (PPW). Proposals for additional mineral extraction within Monmouthshire would be considered against the relevant policies of the Plan to address the concerns raised.	No change required.

Waste

Strategic Policy S17 – Sustainable Waste Management

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2505 / Councillor Steven Garratt / Support	It would be great if we could support SMEs such as recycling firms to move here (WEE/glass/plastic) so more waste can be sustainably processed and not shipped abroad.	The Replacement Local Development Plan (RLDP) provides the land use policy framework to consider/support a range of waste management facilities, including recycling businesses.	No change required.
3118 / Councillor Meirion Howells / Support	I support that the local authorities are required to develop a sustainable approach to the management of waste, including the support of proposals which move the management of waste up the waste hierarchy, with waste prevention and re-use at the top of the hierarchy, followed by preparation for re-use, recycling, recovery and finally disposal.	Support welcomed.	No change required.
1123 / MCC Cleansing and Waste Team / Objection	Criterion v) may need updating following the introduction of new business waste regs April 2024 which require all workplaces to separate their recycling. Paragraph 23.1.7 - it is also important that new developments facilitate sustainable waste management options for the people living in and using new developments once complete. This policy aims to encourage the recycling of waste by the provision of adequate facilities for the storage and collection of waste and separation at source. Waste related considerations should be taken into account in the design of the development so that they are	Policy S17 provides the overarching policy approach to waste management and is therefore strategic in nature. Criterion v) includes the requirement for new developments to make provision for sorting and storage and is therefore considered to address the requirement for workplaces to separate waste. Criterion v) and paragraph 23.1.7 refer to the need to consider waste management of all new development, which would also include the conversion of buildings into residential.	No change required.

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	properly integrated into it, and fully accessible to collection vehicles. This should also be a consideration for conversions to residential - e.g. flats above shops where residents have limited space for storing materials and there is limited street space for storing materials. Discrete on-street storage facilities should be considered in some locations to avoid negative impact on often heritage streets in Monmouthshire towns.		
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.
1301 / Melin Homes / Support	Supportive of sustainable waste management requirements. However, should be noted that waste is not limited to commercial and household waste. There is a significant amount of agricultural waste across the authority. There should be innovative means of dealing with this, for example, CS0224 Cwm Pentref new settlement including proposed anaerobic digestion plant will take farm waste from across their landholding and wider County to generate gas. In addition, a waste to energy gasification plant, could convert waste to bio-gas.	Support for policy S16 is welcomed. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow and anaerobic digestion in rural locations.	No change required.
1683 / Llanarth Estates / Support	Supportive of sustainable waste management requirements. However, should be noted that waste is not limited to commercial and household waste. There	Support for policy S16 is welcomed. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management	No change required.

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	is a significant amount of agricultural waste across the authority. There should be innovative means of dealing with this, for example, CS0224 Cwm Pentref new settlement including proposed anaerobic Digestion plant will take farm waste from across their landholding and wider County to generate gas. In addition, a waste to energy gasification plant, could convert waste to bio-gas.	approach to waste management facilities, including open windrow and anaerobic digestion in rural locations.	
1965 / Monmouthshire Housing Association (MHA) / Support	In principle, MHA support the mineral and waste policies.	Support welcomed.	No change required.
2951 / Tirion Homes / Support	Supportive of sustainable waste management requirements. However, should be noted that waste is not limited to commercial and household waste. There is a significant amount of agricultural waste across the authority. There should be innovative means of dealing with this, for example, CS0224 Cwm Pentref new settlement including proposed anaerobic Digestion plant will take farm waste from across their landholding and wider County to generate gas. In addition, a waste to energy gasification plant, could convert waste to bio-gas.	Support for policy S16 is welcomed. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow anaerobic digestion in rural locations.	No change required.
2952 / Candleston Homes / Support	Supportive of sustainable waste management requirements. However, should be noted that waste is not limited	Support for policy S16 is welcomed. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste	No change required.

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	to commercial and household waste. There is a significant amount of agricultural waste across the authority. There should be innovative means of dealing with this, for example, CS0224 Cwm Pentref new settlement including proposed anaerobic Digestion plant will take farm waste from across their landholding and wider County to generate gas. In addition, a waste to energy gasification plant, could convert waste to bio-gas.	Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow anaerobic digestion in rural locations.	
2954 / Sero / Support	Supportive of sustainable waste management requirements. However, should be noted that waste is not limited to commercial and household waste. There is a significant amount of agricultural waste across the authority. There should be innovative means of dealing with this, for example, CS0224 Cwm Pentref new settlement including proposed anaerobic Digestion plant will take farm waste from across their landholding and wider County to generate gas. In addition, a waste to energy gasification plant, could convert waste to bio-gas.	Support for policy S16 is welcomed. With regard to the consideration of agricultural waste, Policy S16 provides the strategic overarching approach to all waste management options including agricultural waste and Policy W1 - Waste Management Facilities, sets out the Council's detailed development management approach to waste management facilities, including open windrow anaerobic digestion in rural locations.	No change required.
1410 / Mr Kevin Hall / Objection	Our waste collections are down the drain and it's not the workers on the coal face it's the decision making desk jockeys that are the issue we pay more year and get less year on year where will it end.	Comments noted, however, these relate to the operational side of waste management rather the policies set out in the Replacement Local Development Plan (RLDP) and are therefore beyond the scope of the RLDP.	No change required.

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3377 / Mrs Edmunds / Objection	What waste policy?	Section 23 of the Deposit Replacement Local Development Plan sets out a suite of policies relating to the sustainable management of waste in the County as required by Planning Policy Wales.	No change required.
3504 / Ms Alison Grenyer / Objection	There should not be waste disposal sites in such a built up residential area.	It is not clear which built up area the comments relate to, however, in accordance with Planning Policy Wales and Technical Advice Note 21: Waste, the Replacement Local Development Plan notes an in-principle acceptance of general employment sites and major industrial areas as being likely suitable locations for waste facilities, subject to detailed planning considerations.	No change required.
3504 / Ms Alison Grenyer / Objection	They are inappropriate and brown field sites solutions should be sought.	The incorporation of a planning policy framework to facilitate the delivery of a range of sustainable waste management facilities is a requirement of Planning Policy Wales. Policy S17 - Sustainable Waste Management and W1 - Waste Management Facilities, require waste management facilities to be located on existing or proposed industrial estates and within settlement boundaries. The consideration of waste management facilities in the countryside is focussed on waste disposal methods such as open windrow composting and anaerobic digestion, which are more appropriately located in a rural setting.	No change required.
3702 / Keith Plow / Support	Go to the source for ideas. Let it become a net proviso, limiting waste and raw materials.	Comments noted.	No change required.
3748 / Ms Jill Bond / Support	Consideration needs to be given to waste management and collection. Communal bins for flats and small dwellings/gardens, who cannot store bags/boxes between collections.	Criterion v) of policy S17 - Sustainable Waste Management, requires developments to make provision for the sustainable management, sorting, storage and collection of waste in all new development.	No change required.
3760 / Miss Julia Brown / Objection	Nothing is being done to address the existing issues on pollution and waste. This has to come first before adding to it.	Providing a planning policy framework to assess waste management proposals that may come forward is a requirement of Planning Policy Wales.	No change required.
3867 / Mr /Mrs White / Objection	Increased housing will put pressure on drinking water, sanitation, waste	Comments noted, however, with regards to waste collections this relates to the operational side of waste management rather than the land use planning policies	No change required.

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	collections. Sewage is already killing the Wye and other areas.	set out in the Replacement Local Development Plan (RLDP). With regards to impact on the River Wye, the RLDP provides the policy framework in Policy NR3 - Protection of Water Sources and the Water Environment, to assess impact on the River Wye, together with guidance implemented by Natural Resources Wales (NRW).	
3886 / Mrs Nerys Wilson / Comment	Waste management and recycling efforts should focus on minimising environmental impact. Any mineral extraction or waste disposal should be strictly regulated to prevent disruption to Shirenewton's character.	Waste management proposals would be considered against all relevant policies of the Plan and national planning policy, including the environmental impact of the proposal and any potential impact on Shirenewton's character if relevant.	No change required.

Policy W1 – Waste Management Facilities

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	W1ii) - it is not clear what this means or reason for it?	Criterion ii) of Policy W1 - Waste Management Facilities, relates to the transportation of waste/materials to and from proposed waste management facilities and the need to incorporate non-road transportation options, such as rail, where possible. This is consistent with national policy such as the sustainable transport hierarchy which prioritises non-road vehicles over the use of road vehicles.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.
3886 / Mrs Nerys Wilson / Comment	Any new waste facility should be appropriately distanced from Shirenewton and carefully planned to avoid adverse effects on air quality, biodiversity and the local community. Sustainable waste management solutions should be prioritised.	Waste management proposals that come forward during the plan period will be assessed against the relevant policies of the Plan and national planning policy, including consideration of the concerns noted. Policy S17 - Sustainable Waste Management requires waste proposals to conform to the principles of the waste hierarchy, which is based on prioritising sustainable management options.	No change required.

Policy W2 – Agricultural Land – Disposal of Inert Waste

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	Objection as this may cause environmental pollution in terms of ammonia, phosphates and nitrogen. There is no mention here of the need for an environmental impact assessment. See the case of Finch versus Surrey County Council	The need for an Environmental Impact Assessment (EIA) covers a range of development proposals, not just the disposal of inert waste on agricultural land. Specific reference is therefore not considered necessary in relation to Policy W2. The Town and Country Planning (Environmental Impact Assessment (Wales) Regulations 2017 define the projects that are subject to an EIA. Additional information specific to waste related proposals is also set out in Technical Advice Note 21: Waste at paragraphs 4.73 - 4.74. Proposals subject to Policy W2 will also have to satisfy all other relevant policies of the Plan, including Policy PM2 - Environmental Amenity, which addresses the concerns raised.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.

Policy W3 – Identified Potential Waste Management Sites

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1677 / Councillor Frances Taylor / Objection	The idea of a waste management site on or adjacent to SSSI is extremely concerning.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	No change required.
1803 / Councillor Dr Louise Brown / Objection	Strong Objection to a waste facility at Newhouse Industrial Estate Chepstow as the mound is close to the village of Mathern. There is already congestion at High Beech roundabout and having a waste site here will cause additional congestion at the next roundabout for entering and leaving the motorway junction at Chepstow.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities.	No change required.

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		Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	
1138 / Raglan Community Council / Objection	Object to Policy W3 which identifies W3a, 1.5ha Raglan Enterprise Park and W3b, 4.5ha Land West of Raglan as both having potential for the location of in-building waste management facilities. Waste management will add to the impact of the traffic and will erode the quality of the existing and proposed employment sites.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP on the two proposed site allocations in Raglan (W3a - Raglan Enterprise Park and W3b - Land West of Raglan). Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP along with any relevant environmental permitting requirements.	No change required.

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1765 / National Grid Electricity Transmission (NGET) / Comment	We have identified that one or more proposed development sites are crossed or in close proximity to NGET assets (see separate plan for location) W3h - Existing Llanfoist Civic and Transfer Station.	Comments noted. The waste allocation identified under allocation W3h - Existing Llanfoist Civic and Transfer Station, is a functioning waste facility in the County. The position of the power line and provided guidance will be considered should any planning applications be submitted for additional facilities at the site.	No change required.
1984 / Raglan Village Action Group / Objection	Object to W3a and W3b as both having potential for the location of in-building waste management facilities. Waste management will add to traffic impacts, and will erode the quality of the existing and proposed employment sites.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP on the two proposed site allocations in Raglan (W3a Raglan Enterprise Park and W3b Land West of Raglan). Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	No change required.
3562 / Gateway to Wales Action Group / Support	Support.	Support welcomed.	No change required.

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1646 / Mr Brian Williams / Comment	I don't believe site W3f - Land Adjacent to Oak Grove Farm - has mains drainage. It is on an SPZ, so presumably like site W3g this would need to be taken into account.	Comments noted. For clarity, the supporting text accompanying Policy W3 will be updated to refer to W3f - Land Adjoining Oak Grove Farm, Caldicot being located within a Source Protection Zone. Drainage arrangements will be considered as part of any detailed planning application that comes forward on the site.	Update paragraph 24.4.3 to note that W3f - Land Adjoining Oak Grove Farm, Caldicot is located within a Source Protection Zone.
1905 / Elizabeth Hayward / Objection	Concern re two areas of possible waste management shown in Raglan. What type of waste and the process and disposal of waste?	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	No change required.
1906 / Michael Hayward / Objection	Concern re two areas of possible waste management shown in Raglan. What type of waste and the process and disposal of waste?	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally	No change required.

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		contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	
2595 / Mrs Elda Fouch / Objection	Waste disposal facilities should not be sited on or near housing developments because of the danger of pollution and risks to public health.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning	No change required.

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		application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	
2616 / Mrs Sarah Turner / Objection	Concern that an incinerator may be built on this site.	It is not clear from the comments, which site is being referred to. However, on a more general level, Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	No change required.
3632 / Mr George RV Ashworth / Objection	W3 identifies W3a - 1.5ha Raglan Enterprise Park and W3b - 4.5ha Land West of Raglan, as both having potential for the location of in-building waste management facilities. Waste management will add to traffic impacts, and will erode the quality of the existing and proposed employment sites.	Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason,	No change required.

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		many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning application procedures and would be required to satisfy the policies of the RLDP, along with any relevant environmental permitting requirements.	
3972 / Mrs Sue Young / Objection	Proposals say there is potential for a waste site over twice the size of Five Lanes. At what point will this be decided and will there be further consultation or will plans just be pushed through?	It is not clear from the comments which site is being referred to. However, on a more general level Planning Policy Wales (PPW) requires suitable locations for sustainable waste management development to be identified in development plans so that a range of waste related infrastructure can be facilitated. Further guidance is set out in Technical Advice Note 21: Waste. This states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies. In this respect, there are no specific waste proposals being put forward as part of the RLDP. Waste related proposals that come forward would require the submission of a planning application, which would be consulted on as per the usual planning	No change required.

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		application procedures and would be required to satisfy the policies of the RLDP along with any relevant environmental permitting requirements.	