



Monmouthshire Replacement Local Development Plan

2018-2033

Report Of Consultation: Appendix 12 Deposit RLDP Representation Responses

Volume 20 – Habitats Regulations Assessment
& Integrated Sustainability Appraisal

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Habitats Regulations Assessment

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1061 / Bannau Brycheiniog National Park (BBNP) / Objection	Welcome ongoing discussions of the approach towards ensuring water quality in the Usk (in particular) and continue to need to work very closely on cross boundary settlements - perhaps through the Usk Catchment Partnership. One issue in the HRA of Usk/Wye is that it doesn't appear to consider impact of climate change on water temperature and the in-combination impacts arising on features.	Aecom consultants, who undertook the Habitats Regulations Assessment (HRA) on the Deposit Plan, has advised that whereas the Sustainability Appraisal can (and should) discuss things like climate change impacts in broad terms, including effects on habitats and designated sites, the HRA has to be much more specific, to link particular developments to impacts on specific European sites. The effects of climate change will exacerbate existing issues, and reference could be made to that in the HRA for background. However, these are national/global issues rather than being a specific direct effect of development x on European site y. Secondly, it is impossible to quantify either the impact or the effect at a local scale due to (for example) a lack of any assessment criteria or thresholds. So, there is not any way to assess it other than to make the general observation. Such a general observation is not considered appropriate for inclusion in an HRA.	No change required.
1356 / Welsh Government / Comment	The ability of LDPs to demonstrate they can align with the NRW's updated guidance relating to phosphates and nutrient neutrality is paramount for plans to be able to be considered sound. Avoiding adverse effects regarding phosphates and the riverine environment may have an influence on the Plan's strategy, to which this plan has responded positively. The Deposit Plan and associated HRA must demonstrate nutrient neutrality or betterment in order to be considered sound.	The Habitats Regulations Assessment (HRA) is considered to have sufficiently addressed phosphates and nutrient neutrality. The Council has been working collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to Dŵr Cymru's planned improvements to waste water treatment works and NRW's review of permits. Commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW's review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy. The Deposit Plan and associated HRA have been progressed in accordance with Welsh Government's comments received in relation to the Preferred Strategy (2022), which advised the Council 'that new site allocations should be considered in Monmouth on the basis that sufficient certainty is provided by Dwr Cymru Welsh	No change required.

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		Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025'.	
1356 / Welsh Government / Comment	WG urge the LPA to seek own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA), as responsibility for these matters rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.	The Local Planning Authority is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal. With specific reference to the HRA, this has been undertaken by Aecom Consultants and follows the relevant regulations appropriate to the stage of Plan being reviewed.	No change required.
1412 / Natural Resource Wales (NRW) / Objection	Ecology concern for foraging bat SAC. Do not agree with conclusion of HRA that 'there's sufficient policy framework that no adverse effect would arise on Habitat sites either alone or in combination with other plans or projects' (point 2 of letter).	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 Sustainance 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. The HRA Addendum is therefore considered to have addressed the issues raised.	No change required.
1412 / Natural Resource Wales (NRW) / Objection	Ecology concern for foraging bat SAC. The assessment of the potential loss of functionally linked land (land within 3km of the SAC termed Core Sustainance Zone) does not demonstrate that proposed	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	No change required.

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	allocations would not have an adverse effect on the conservation objectives of the Wye Valley and Forest of Dean Bat SAC (points 3 -11 of letter).	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. The HRA Addendum is therefore considered to have addressed the issues raised.	
1412 / Natural Resource Wales (NRW) / Comment	Sensitive Nutrient SAC River Catchments - The HRA is silent on HA14 and should be included under the heading 'Allocations where there is no capacity for additional wastewater' (point 16 of letter).	The Habitats Regulations Assessment (HRA) screens a long list of allocations including Policy HA14 – Land at Churchfields, Devauden, into the Appropriate Assessment. However, the Appropriate Assessment section on water quality does not single out any individual development sites but treats it as a strategic issue which includes HA14. It ultimately states that ‘The RLDP allocations have been made in consultation with Welsh Water and Natural Resources Wales, having regard to headroom limits and phosphate solutions proposed Policy NR3 – Protection of Water Sources and the Water Environment sets out requirements for development which may impact upon the water environment and associated land. Given this, it is concluded that there would not be adverse effects on the site integrity of the River Usk SAC and the River Wye SAC regarding water quality.’ The Infrastructure Delivery Plan would in any event protect European sites from adverse effects on integrity, clearly stating that ‘Development cannot be consented until a detailed scheme showing compliance with the environmental permit has been agreed with NRW and DCWW.’ Therefore, it does not raise issues over the protection of European sites.	No change required.
1803 / Councillor Dr Louise Brown / Objection	No account has been taken of the comments in the Habitats regulation assessment in relation to Bats and the sites it impacts.	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.	No change required.

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		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 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. Specific survey requirements are best informed by latest peer-reviewed guidance and supplementary planning guidance.	
1803 / Councillor Dr Louise Brown / Objection	The ammonia concentrations mentioned on page 2 of the Habitats regulation assessment are at odds with the reports from the Woodland Trust in relation to ancient woodlands for the recent expansion of a poultry unit for a farm in Shirenewton which mentions being at critical load. Ammonia damages trees.	No ammonia concentrations are cited on page 2 of the HRA. It is unclear exactly what statement is being questioned but if it is statements such as the ammonia critical level not being breached, this refers to ammonia concentrations at specific modelled locations (within 200m of certain road links). There are 2 critical levels for ammonia (depending on whether lichens and bryophytes are relevant) and ammonia concentrations vary considerably by location. No information regarding the Woodland Trust modelling referenced has been provided, but it is very likely that the two documents are talking about different locations and/or sources or using different metrics to express the data. The air quality assessment for the HRA has been undertaken in line with guidance.	No change required.
1803 / Councillor Dr Louise Brown / Objection	The development sites have an amber as opposed to green rating due to the Potential impact pathways are present: • Atmospheric pollution • Loss of functionally linked land • Water quality • Water quantity, level and flow (see pages 118 to 146 for all the development sites in this habitats assessment).	It is unclear what issue is being raised, but as noted, the proposed allocations addressed on pages 118 – 146 of the Deposit HRA have been screened into the Appropriate Assessment.	No change required.

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1803 / Councillor Dr Louise Brown / Objection	Page 18 mentions the threats to the Severn Estuary from water pollution, the Mouton Brook is being polluted by human sewerage from the broken pipe, it then flows into the Nedern and then joins the Severn Estuary to the sea, so it pollutes the Severn Estuary first. It will not go to the Nash treatment centre before the Severn Estuary as this is from sewerage leakages.	Sewage leaks are something the water company is legally obliged to address and cannot reasonably be considered an impact of the Local Plan or an automatic result of growth. It is ultimately a matter associated with the system not working as it should.	No change required.
1803 / Councillor Dr Louise Brown / Objection	It states on page 27 that a critical level for nitrogen oxides for NOx has been set at 30ug/m3 for all vegetation types, but the national level has been set at 40ug/m3, and the World Health organisation level is set at just 10ug/m3. In other words, the national level for pollution for humans at 40 is higher than what is considered a critical level for all vegetation types. All areas of Chepstow and Pwllmeyric are already above the WHO levels.	Comments noted. Aecom consultants have noted that the different levels for nitrogen oxide levels (NOx) for humans and plants are due to plants being more sensitive to NOx than people, rather than because they are deemed more important, hence the lower – more stringent – critical level. Also, NOx affects people and plants in different ways. The Council is aware of the air quality issues affecting Chepstow and has declared an Air Quality Management Area within Chepstow and is therefore subject to annual monitoring arrangements. Further details can be viewed in the 2024 Air Quality Progress Report (Sept 2024).	No change required.
1803 / Councillor Dr Louise Brown / Objection	Page 57 states that There are also several policy mechanisms through which the Severn Estuary SAC could be protected, for example by introducing the following wording into a policy addressing the protection of European sites in Monmouthshire: 'Any development proposals that would increase visitor access to sensitive habitat features in the Severn Estuary SAC, SPA and Ramsar site, especially on to saltmarsh and mudflat habitat, will not be supported unless no adverse effect on the integrity of the sites	The Deposit Replacement Local Development Plan (RLDP) addresses the recommendation relating to potential impacts on the Severn Estuary SAC from recreation pressure through the introduction of Policy NR2 – Severn Estuary Recreational Pressure.	No change required.

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	could be confirmed.' Nothing in the policies on this suggestion in the habitats assessment unless missed it.		
1787 / Gwent Wildlife Trust / Comment	Refer to references in the HRA in relation to bat surveys and recommended text to be inserted in the RLDP. Suggest it is not clear if the wording has been inserted into the RLDP and as a consequence GWT are concerned adequate survey work may not be undertaken.	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 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 Sustainance 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	No change required.

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		requirements to minimise the impacts of light spill and linear features that could serve as bat flight lines are protected. Specific survey requirements are best informed by latest peer-reviewed guidance and supplementary planning guidance.	
3562 / Gateway to Wales Action Group / Objection	Refer to bats and state the 1km Juvenile Sustenance Zone at the Leasbrook site is not valid and that all wording in relation to 1km Juvenile Sustenance Zones should be removed from the HRA. State the loss of functionally linked land will harm bat foraging and feeding. Suggest the protection for Greater Horseshoe Bats has been diluted by Monmouthshire County Council in response to the HRA consultant's comments, where the Council has instead provided supporting text to NR1 in paragraphs 11.10.2 - 11.10.8 but has not provided specific details of the need for bat surveys, survey seasons and potential need for mitigation.	Contrary to comments provided, 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 substance 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. Reference to the Core Sustenance Zone will also be added criterion b) of Policy HA6 (Land at Rockfield Road, Monmouth) and criterion e) of Policy HA8 (Tudor Road, Monmouth). A supporting paragraph will also be added in relation to EA1b (Poultry Units, Rockfield Road, Monmouth). 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 be undertaken. 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 other than April to September may sometimes be required. It is therefore	No change required to the HRA, however, Policy HA4 will be amended to replace reference to the Juvenile Sustenance Zone with Core Sustenance Zone. Reference to the Core Sustenance Zone will also be added to criterion b) of Policy HA6 – Land at Rockfield Road, Monmouth and criterion e) of policy HA8 – Tudor Road, Monmouth and a supporting paragraph will be added in relation to EA1b – Poultry Units, Rockfield Road, Monmouth.

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		considered that the policy in the RLDP 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. Specific survey requirements are best informed by latest peer-reviewed guidance and supplementary planning guidance.	
3562 / Gateway to Wales Action Group / Objection	State site HA4 should have been screened out at the screening stage of the HRA as it uses mitigation measures. Refers to rules that apply to the Habitats Regulations Assessment in both England and Wales. Also refer to the rules in relation to likely significant effects.	Aecom consultants has advised that this is a misunderstanding of case law. The term 'screening' in the context of the Sweetman Ruling does not refer to including or excluding a site from a development plan. Rather it refers to a stage in the Habitats Regulations Assessment (HRA) process (HRA screening aka Test of Likely Significant Effects). What the ruling says is that in the first stage of HRA you cannot take account of mitigation measures, unless those measures would be required anyway to comply with other legislation. However, mitigation (measures specifically introduced to protect European sites) can and should be considered in HRA Stage 2 (appropriate assessment), as was done for the Local Development Plan HRA. Therefore, the Sweetman ruling essentially relates to HRA procedure (at what point in the HRA process you should take account of mitigation) rather than whether a site should be included or excluded from a development plan. There is nothing in the ruling that requires sites which require mitigation to be dropped in favour of sites that do not.	No change required.
1663 / Richborough / Comment	With reference to the recreational pressure on the Severn Estuary SPA/SAC/Ramsar site and focus on the strategic growth areas of Caldicot and	Comments noted.	No change required.

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	Chepstow being the main focus of mitigation, note the strategic allocation of HA2 can play an important role in facilitating new and enhanced access to public open space, details of which along with wider green infrastructure provision will be developed as part of any future planning applications for the site. Agree with the conclusion of the HRA that the RLDP will not result in adverse effects on site integrity regarding recreational pressure.		

Integrated Sustainability Appraisal

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1061 / Bannau Brycheiniog National Park (BBNP) / Comment	We note your Council's significant role in delivering Dyfodol Y Bannau (and consider the missions should be referenced both in the LDP and the Environmental Report (SEA) [although we recognise that Dyfodol Y Bannau and 'Place Planning' is] and we hope to work with you on its delivery.	The relationship with the Bannau Brycheiniog National Park and Dyfodol Y Bannau (management plan) is recognised in the ISA. It is noted that this reference however relates to the previous management plan and therefore paragraph 8.12.24 will be updated to refer to the Dyfodol Y Bannau: The Future (The Management Plan for Bannau Brycheiniog National Park 2023-2028) instead. Reference to the specific missions set out in the Dyfodol Y Bannau is however not considered necessary.	Update reference in paragraph 8.12.24 of the ISA to delete BBNP Management Plan and replace with 'Dyfodol Y Bannau: The Future (The Management Plan for Bannau Brycheiniog National Park 2023-2028)'
1209 / Aneurin Bevan University Health Board / Objection	Suggest including a requirement for developers to undertake a Health Impact Assessment (HIA) on major development proposals at pre-application or application stage.	Individual HIA's on major development proposals at the pre-application or planning application stage would be supported by the ISA. It is recognised that a HIA could provide a more targeted assessment in relation to health indicators, more wider determinants of health and health inequalities.	No change required.
1356 / Welsh Government / Comment	WG urge the LPA to seek their own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA), as responsibility for these matters rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.	The LPA is confident that all of the procedural requirements in relation to the SA, SEA and HRA have been met. The Health Impact Assessment is included as part of the Integrated Sustainability Appraisal.	No change required.

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1803 / Councillor Dr Louise Brown / Objection	In relation to the sites at Chepstow the integrated assessment indicated that the Bayfield site which the Mounston Road site replaced had less of a negative impact, a similar conclusion being reached by Barratts/David Wilson homes representations. (see pages 43 to 47). Page 58 provides the Council's reasons but does not provide an independent assessment of the 2 sites and its own evidence on negatives suggests otherwise than the council option. However, none of the sites in Chepstow should be developed due to the traffic congestion already present. To suggest that the sites would have no impact on transport and movement is unacceptable and it is obvious that no account has been taken of the increase in traffic at High Beech roundabout and its lack of capacity since the Severn Bridge tolls were removed.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. Regarding transport and movement specifically, while the ISA concludes that residual effects are unlikely to be significant in nature, detailed discussion is provided in terms of the impact the options would have on transport and movement objectives, both positive and negative. The ISA does not suggest that there would be an absence of effects. Section 6.2 of the ISA should be referred to along with the ISA Technical Annex relating to Candidate Sites Assessment. Paragraphs 7.2.4 – 7.2.22 of the ISA set out the Council's reasons for selection of the allocated strategic sites, the ISA findings are provided in Section 8 of the ISA Report on the Deposit Plan.	No change required.
1803 / Councillor Dr Louise Brown / Objection	The diagram at page 64 shows the unacceptable concentration of development in the South of the County and the concentrated distance between them and the primary settlements in the North of the County which are a much greater distance from each other. This demonstrates how the spatial development strategy is unacceptable.	The diagram referred to refers to the RLDP Strategic Diagram which is replicated in the Deposit RLDP. It provides a strategic overview of the Growth and Spatial Strategy and is not to scale. The ISA considers that the Spatial Strategy represents a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need.	No change required.

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1803 / Councillor Dr Louise Brown / Objection	The integrated sustainability assessment seems on the whole to talk about the plan in positive terms but it did the same for the previous one and no longer seems to suggest as it did before at the earlier stages of the RLDP that the development should be in the North of the County because of the indicative green belt in the Future Wales 2040 plan. This questions the independence of such assessments which are commissioned by the local authority.	The Deposit Plan, as with other formal stages of the RLDP, is subject to an Integrated Sustainability Appraisal which fulfils the requirements and duties for Sustainability Appraisal and Strategic Environmental Assessment, Equalities Impact Assessment, Health Impact Assessment, Welsh Language Impact Assessment and Well-being of Future Generations. The role of the ISA is to inform and influence the plan-making process by assessing the extent to which the Plan's proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The ISA is an iterative process undertaken at key stages as the Plan progresses. The ISA considers that the Spatial Strategy represents a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need. AECOM were commissioned jointly by Monmouthshire County Council, Torfaen County Borough Council and Blaenau Gwent Council to undertake ISAs of each of the Local Authorities' RLDPs. The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP.	No change required.
1013 / Glamorgan-Gwent Archaeological Trust (GGAT) / Comment	General comments in relation to the archaeology and historic environment within the ISA.	The Deposit Plan, as with other formal stages of the RLDP, is subject to an Integrated Sustainability Appraisal which fulfils the requirements and duties for Sustainability Appraisal and Strategic Environmental Assessment, Equalities Impact Assessment, Health Impact Assessment, Welsh Language Impact Assessment and Well-being of Future Generations. The role of the ISA is to inform and influence the plan-making process by assessing the extent to which the Plan's proposals and policies will help to achieve the wider environmental, economic, social and cultural objectives of the RLDP. The consistency between the ISA and comments from GGAT is noted.	No change required.
1281 / Barratt David Wilson Homes / Objection	The updated ISA 2024 assessment undertaken for the deposit plan has a number of inconsistencies where Moun-ton Road has scored more points than Bayfield despite there being no clear reason for this, we set this out in table 2	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA	No change required.

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		stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified.	
1281 / Barratt David Wilson Homes / Objection	ISA Economy and Employment assessment inflates the potential impact that Moun-ton Road has in this category (Q10 table 2)	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The ISA recognises that Policy HA3 Land at Moun-ton Road, Chepstow is proposed for residential use and commercial uses, and as such, development of this site will contribute to the local/wider economy, with potential for long-term positive effects.	No change required.
1281 / Barratt David Wilson Homes / Comment	ISA Population & Communities Homes assessment - Moun-ton road scores negatively against these criteria as is within a green wedge (reason why the site was previously refused DC/2013/00571) (Q10 table 2)	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial	No change required.

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		assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The population and communities topic is divided into more than one criterion, while it is recognised that it scores negatively as it is located within an Allocated LDP green wedge it scores positively due to its proximity to both primary and secondary education. Regarding the Green Wedge specifically, as part of the Green Wedge Review the HA3 Land at Mounton Road, Chepstow site has been removed as a green wedge designation. For further detailed information please refer to the Green Wedge Assessments and Green Wedge Review.	
1281 / Barratt David Wilson Homes / Objection	ISA population & Communities Placemaking assessment - gradients are far more favourable for active travel routes from Bayfield to local schools and the leisure centre. As such, we are strongly of the view that in light of this, Land at Bayfield should be scored higher as gradients can be problematic for pedestrians and cyclists. An amendment to the ISA score is required to reflect this (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The population and communities topic area does not go into the detail of consideration of the gradients of active travel. It is therefore not considered appropriate to amend the ISA rating as suggested.	No change required.
1281 / Barratt David Wilson	ISA Health and Wellbeing assessment - The criteria is that a site is within 800 m of a health service OR an active travel route.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP.	No change required.

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Homes / Objection	Therefore, Bayfield should be scored equally to Mounton Road (Q10 table 2).	The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification of the scoring, for Mounton Road the site is within 800m of a health service and an active travel route and therefore given a ++ rating. As noted in the commentary Bayfield is not located within 800m of a health service and therefore given a + rating. It is therefore not considered appropriate to amend the ISA rating as suggested.	
1281 / Barratt David Wilson Homes / Objection	ISA Transport and Movement assessment - Bayfield doesn't score as positively as Mounton Road. It is noted that the only difference appears to be that Mounton Road is slightly closer to the Town Centre. Given gradients we are strongly of the view that a reasonable walking distance to a central shopping area is 1600m and as such the scores should be equal (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification of the scoring, for Mounton Road the site is within close proximity i.e. less than 800m to a bus stop, central shopping area, public right of way and national cycle network and therefore given a ++ rating. As noted in the commentary Bayfield while the site is located in	No change required.

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		close proximity to a bus stop and national cycle network along with public right of ways, it is not located within 800m of a neighbourhood centre or central shopping area and therefore given a + rating. It is therefore not considered appropriate to amend the ISA rating as suggested.	
1281 / Barratt David Wilson Homes / Objection	ISA Natural Resources (air) assessment - Mounton Road located immediately adjacent to strategic route which leads to Chepstow's AQMA, plus also located closer to the AQMA - should therefore score negatively on these criteria (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification for the scoring. Both sites are given a + rating as they do not intersect with an AQMA. It is therefore not considered appropriate to amend the ISA rating as suggested.	No change required.
1281 / Barratt David Wilson Homes / Objection	ISA Natural Resources (land) assessment - larger proportion of BMV land at Mounton road - this assessment criteria is therefore considered to be imbalanced and unreasonable to be scored the same as Bayfield. Should be corrected with land at Bayfield scoring more favourably (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for	No change required.

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		purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification for the scoring. Both sites are given a - - rating as they are wholly greenfield, contain BMV and located within a mineral safeguarding area. It is therefore not considered appropriate to amend the ISA rating as suggested.	
1281 / Barratt David Wilson Homes / Objection	ISA Historic Environment assessment - Bayfield same negative score at Mounton Road - considered imbalanced as Mounton Road likely to impact upon the setting of a listed building and conservation area and Bayfield may disturb archaeological remains. Land at Bayfield should be given a better score on the basis it would have a less significant impact (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification for the scoring. Both sites recognise the development of the site has potential for a significant negative effect on the historic environment and given a - - rating. It is therefore not considered appropriate to amend the ISA rating as suggested.	No change required.
1281 / Barratt David Wilson Homes / Objection	ISA Landscape assessment - Bayfield score more positively in the Landscape Capacity Update Study and therefore should be scored more positively within this ISA assessment (Q10 table 2).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial	No change required.

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		assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The wording in the commentary reflects the justification for the scoring noting for both sites the effect is uncertain at this stage. It is therefore not considered appropriate to amend the ISA rating as suggested.	
1281 / Barratt David Wilson Homes / Objection	Table 7.1 (Strategic Site Options of the Integrated Sustainability Assessment 2024) indicates that there is more support locally for the allocation of Bayfield over Mounon Road, with 51 respondents supporting Bayfield compared with 43 supporting Mounon Road. Alongside this, there is a greater level of opposition to Mounon Road with 143 opposed (compared with 132 opposed to Bayfield). This appears to have been disregarded in the assessment (Q10 point 1.17).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. Paragraph 7.2.2 states clearly that the Placecheck exercise did not form part of the formal consultation, the results provided an indication of public opinion only.	No change required.
1663 / Richborough / Objection	Concerns over Option G suggesting this should be ranked higher in a number of categories set out by the ISA including; Economy and Employment, Populations and Communities, Climate Change (including Flood Risk). Argue that Option G should be ranked higher than Option I in relation to Climate Change (including Flood Risk).	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for	No change required.

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		purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The Technical Annex relating to the Candidate Sites Assessment should also be referred to, the wording in the commentary reflects the justification for the scoring provided in each of the topic areas. For Climate Change (including flood risk) both sites score the same albeit for different reasons/ CS0270 (Option I) is given a – rating given that the site intersects with fluvial flood zone 2 or 3 and a + as the site does not intersect with a high surface water flood risk area. CS0274 (Option G) is given a + as the site does not intersect with a high fluvial flood risk area and a - as the site intersects with a surface water flood risk area. It is therefore not considered appropriate to amend the ISA rating as suggested.	
1663 / Richborough / Objection	Consider Option J should be ranked higher in a number of categories considered by the ISA including; Natural Resources, Historic Environment and Landscape. Strongly disagree with ranking of Option L and state Option L should be ranked lower under Landscape.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. Nevertheless, with specific regard to Landscape, as per the ISA methodology, ranking and significance has been determined based on the evidence available - specifically the Landscape Capacity Update study. The sustainability consultants have also acknowledged the Green Wedge designation as an issue through the appraisal narrative, and this is further reflected in the uncertainty concluded for this site.	No change required.

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2394 / Taylor Wimpey / Objection	Critique the ISA assessment of Ifton Manor Farm, Rogiet and provide their own assessment of the site.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The ISA Technical Annex relating to Candidate Sites Assessment should also be referred to.	No change required.
1472 / Powells / Support	Refer to the HA18 Land at Redd Landes Shirenewton site providing detail of how the site performs positively in relation to environmental considerations with limited long term impact on the surrounding landscape and inclusion of biodiversity enhancements to achieve net biodiversity gain. Also note the site has social benefits through the provision of affordable housing and the site's integration with existing community facilities. Recognise the site will have an economic impact with short term benefits during the construction phase and long term benefits with increased patronage of local businesses contributing to the village's economic sustainability.	Support welcomed.	No change required.

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2701 / Mrs Claire Sinclair-Stedman / Objection	ISA identifies objectives the proposed development would fail to meet, relating to GI, biodiversity and environment resilience. Development on high-grade agricultural land, which is part of the Green Wedge raises concerns about loss of valuable natural resources and negative impact on local landscape.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The ISA Technical Annex relating to Candidate Sites Assessment should also be referred to.	No change required.
3763 / Natalie Sandercock / Objection	Concludes there would be no significant effect on climate change including flooding risk but then acknowledges that expansion onto greenfield land would have residual negative effects.	The focus of the ISA is on likely significant effects. The ISA uses a consistent, clear methodology, underpinned by the latest evidence informing the RLDP. The ISA candidate site assessment is the first step for the ISA, the methodology of which involves employing GIS data-sets and measuring ('quantitative analysis') how each candidate site relates to various constraint and opportunity features. Further detailed, qualitative, comparative analysis is carried out through subsequent ISA stages, as seen within the Deposit ISA and its accompanying appendices. The candidate site assessment is proportionately detailed to provide an initial assessment of all reasonable alternative sites. No ranking has been carried out, and as such the application of numerical values to RAG findings to compare sites is not appropriate at this stage. The methodology is considered to be robust and fit for purpose, underpinned by GIS tools and spatial datasets. Assumptions and limitations have also been identified. The ISA Technical Annex relating to Candidate Sites Assessment should also be referred to.	No change required.