Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit

Representations Register

Volume 4 - Private Individual

monmouthshire
sir fynwy

	Private Individual
3172	Richard Liddell
3195	Mark Cottle
3215	Jonathan (Jonty) Pearce
3236	Dr Jonathan Ryder
3249	Mrs Lisa Riddington
3258	Mr H Matthews
3260	Mr Mark Le Moignan
3267	Mr Neil O'Doherty
3268	Chris Goldsbrough
3269	Christine Voyce
3270	Caroline White
3271	John Taylerson
3272	Alan Goldsbrough
3273	Lisa Wadley
3274	Justine Johnson
3275	John Yapp
3277	John Craig
3278	Miss Susan Griffiths
3279	Dr Sian E Rees
3280	Colin Scott
3281	Sophie Powell and Sam Hooper
3284	Mr Allen Smith
3287	Robert Elliott
3288	Janet Wall
3290	C Reynolds
3291	David Evans
3292	Georgina Holman
3293	J Wall
3294	Jed Knight
3295	Jo Thorp
3296	Michelle Holman
3297	Mr W T Phillips
3298	Carol Reynolds
3299	Nigel Preen
3300	Richard Thorp
3301	Susan Read
3302	Andrew Burnett
3303	Anthony Brennan
3304	Daphne Smith
3305	David Greenhalgh
3306	E J Brennan
3307	Edwina Williams
3308	Gary Hill
3309	Gillian Rogers
3310	Harriet Brennan
3311	Lynda Ord
3312	Not stated

3313 Peter Shaw Willington
3314 Sue Gaylard
3315 David Thomas

3172

Richard Liddell

planningpolicy@monmouthshire.gov.uk.

This objection is by [redacted]

Objection to Policies H1 and HA3, Mounton Road Fields, Chepstow

Reason for Objection

This area provides a pleasant outlook at the entrance to the Wye valley, emphasises the agricultural nature of the area and provides the setting for Chepstow as a former market town set in the middle of the countryside. It has a parkland type setting, with the remains of country house metal fencing traversing the area, and provides a pleasant outlook for visitors and locals alike when travelling along the A466, or waiting in a traffic queue to negotiate Highbeech roundabout.

The character of this area and its contribution to the Wye Valley and the town of Chepstow cannot be understated. This relates to the planning policy the Objectives in the Plan, and we include relevant extracts as follows:-

Local authorities hold information on SINCs within their area and include policies in their Local Plans and Local Development Frameworks to safeguard these sites from inappropriate development

3.64 Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust

Monmouthshire Replacement Local Development Plan Growth and Spatial Options Paper (September 2022)

Objective 11 Place making
A Wales of Cohesive Communities (Well-being Goal 5)
Any developments will need to enhance the character and identity of the settlements and be in accordance with national sustainable place-making principles. Growth in employment alongside housing will create more sustainable places. The value and importance of place- making has been emphasised in light of Covid-19.(p8)

The presence of open fields at the entrance to Chepstow speaks to the location of a pleasant market town set in open countryside. Development of this site would destroy this character in non compliance with Objective 11.

A Wales of Cohesive Communities (Well-being Goal 5)
*Objective 11 Place-making Low requirement for new housing so provides very limited opportunity to enhance the character and identity of Monmouthshire's settlemen**ts.***

A Wales of Cohesive Communities (Well-being Goal 5)
A More Equal Wales (Well-being Goal 4)
Objective 11 Place-making Any developments will need to enhance the character and identity of the Primary, Secondary, Severnside and Rural Settlements in accordance with national sustainable place-making principles, the value and importance of place-making has been emphasised in light of Covid-19.

Sustainable Settlement Appraisal December 2022

3.1 Background to Settlements within Monmouthshire

3.1.1 The authority is predominantly rural with a mixture of market towns and villages. The County has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north-west and the river corridor of the Wye Valley Area of Outstanding Natural Beauty in the east.

3.1.2 An integral element of Monmouthshire's distinctive settlement pattern arises from its historic market towns and villages and their relationship with the surrounding rural areas

3.2.5 PPW 11 has a strong focus on promoting placemaking, which is considered instrumental to achieving sustainable places, delivering socially inclusive development and promoting more cohesive communities. Placemaking is deemed a holistic approach that "...considers the context, function and relationships between a development site and its wider surroundings" (PPW 11, p.14).

Comment

The development of this land for housing would not comply with the above objectives.

The Mounton Road site has been protected from development for 43 years. It was first recognised as a visually important site in the Gwent Structure Plan 1981, when it was designated as a "Green Space, important as the gateway to the Wye Valley".

This designation followed the advice of PPW which has been consistent in its various amendments over the years in requiring supporting infrastructure, and there is strong argument that this has not been provided for this site. There is a need to protect this open land from development, hence its designation as a green wedge in the various planning policy document reviews since 1981.

PPW Edition 12 is clear that green wedge policies should be reviewed as part of the development plan process, and MCC has not undertaken such a review in order to establish the extent of damage to the sense of place of Chepstow and the visual importance of the open rural character of the site if the site were to be developed.

Gwent Structure Plan 1991 - 2006 included the Mounton Road fields within its Green Space designation (Policy LC6), considering that such Green Space designation is intended to retain an open rural character.

MCC Adopted Local Development Plan 2011 - 2021 reaffirmed the designation of Mounton Road fields as a Green Wedge, stating that the designation safeguarded the "character and identity of settlements" and "Development proposals within Green wedges will only be permitted where they do not prejudice the open characteristics of the land".

There has thus been consistent, constant protective planning policy over a period of many decades, and there has not been a thorough appraisal of the proposal to destroy the planning policy protection that the site has rightly had applied to it for many decades.

Extracts of the above are included in the Appendix.

Planning Application DM/2024/01242 : Assessment as to whether a EIA is required for development of the Mounton Road site.

The importance of the site as a Green Wedge has been reinforced as recently as 2014, with the planning application DM/2024/01242 : Assessment as to whether a EIA is required for development of the Mounton Road site. Extracts from the the application is enclosed in the Appendix.

The planning officer and the contents of the application clearly confirms in this Assessment determination that the site is visually important, will have an impact on the immediate local highway network, and will likely have a heritage impact on St Lawrence House, a listed building. Comments in the application include :-

Q 2 EIA Details - Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations? - Yes - The site is 850m from the River Wye SSSI and SAC, and the development site is circa 185m from the Wye Valley National Landscape AONB

Q 9.1 - Transport and Access - The impact of increase in traffic resulting from the development will need to be considered in detail. Traffic is a consideration, and a Transport and access assessment will be required.

The proposal will have an impact on the immediate local highway network the A466 and A48 (local and trunk road and the High Beach roundabout (trunk) a detailed and robust transport assessment will be required to support an application. The application will also affect existing active travel and sustainable transport provision.

Q 7 landscape and Visual - It is considered that there will be a significant adverse impact or change as a result of the proposal. The site is within a highly a valued landscape character in Monmouthshire in terms of its status, landform, scenic quality, biodiversity, GI and wide ranging historic and cultural links.

Q 7.1 and Q8 - Cultural Heritage - There is a likely heritage impact on the setting of St Lawrence and its relationship with its visual and setting relationship with the parkland landscape to its south.

Petition

The purpose of Development Plan consultation is to allow the man on the top of a local omnibus to have a say and make their views known. They might not always be aware of the particular requirements for so doing, and the Inspector is requested to have regard to the stated views of the public on the various parts of the Plan. There have been a couple of websites made available in order for the man in the street to comment, and the Inspector is requested to have regard to the content and numbers of such comments.

In addition, order to assess the views of the people, a small survey was undertaken. An area of housing was surveyed - every door was knocked - but the area was deliberately chosen as not overlooking the Mounton Road fields site, to avoid the criticism of [redacted]. The results of this survey are included in the Appendix, and while it is accepted that the survey sample was small and therefore cannot be applied to a larger population with accuracy, nevertheless it must show a snapshot of the views of the people of Chepstow.

The survey showed that 56% percent of the whole of the population of Chepstow who are 18 years old and above object to Policies H1 and HA3. While it is accepted that the number of households surveyed was a very small sample, and wide errors can occur when results from a small sample are expanded to a larger population, the extent of the opposition to the above policies must not be ignored, at the very least it can be concluded that there is a significant underlying objection by the majority of all of the residents living in Chepstow to Policies H1 and HA3.

Deliverable

It is unlikely that the mixed use proposals are viable. The Settlement Boundary Review October 2024 makes no mention of a mixed use, it refers only to housing.

There is no information that there is anybody waiting in the wings to take on the site proposals for either a hotel or a care home. If there was a demand for a hotel, economies of scale would determine that it would have to be of a considerable size, and this would have the effect of decimating the hotels and guest houses offering accommodation in Chepstow and the Wye valley, further reducing the viability of the town of Chepstow itself.

Alternative site

if it were determined that housing, a hotel and a care home were required, then there is no bar to the use of the Barnetts Farm land for housing, and a hotel and care home can be accommodated on the land adjoining the racecourse roundabout, between the B4293 and the B4235 - a site immediately adjacent to the racecourse and with an easier, less hilly walk into Chepstow town centre. Both of these sites are suitable, available and deliverable.

Given that there are a number of objections to the Mounton Road fields site based on the increase in traffic numbers, these sites would mitigate somewhat and dissipate traffic numbers on St Lawrence Road, given that there is an alternative route in to the town centre along Welsh Street. Vehicles would not travel along St Lawrence Road if their destination was to the north, towards Monmouth, or west, towards Usk.

CONCLUSION

The planning officer considered that the housing development is likely to have significant effects on the environment in the comments made on Application DM/2024/01242, which stated

It was considered that there will be a significant adverse impact or change as a result of the proposal. The site is within a highly a landscape (stet) character in Monmouthshire in terms of its status, landform, scenic quality, biodiversity, GI and wide ranging historic and cultural links.

It is the strongly held views of the people of Chepstow that no development should take place on the Mounton Road fields site, and there are strong planning reasons to uphold this view.

[redacted]

14 December 2024

APPENDIX : PETITION ANALYSIS

PETITION AGAINST THE EXTENSION OF THE CHEPSTOW SETTLEMENT BOUNDARY TO INCLUDE MOUNTON ROAD FIELDS (Policy H1) TOGETHER WITH THE PROVISION OF HOUSING, A HOTEL AND CARE HOME (Policy HA3)

A petition has been raised in order to gauge the extent of support in Chepstow for objections to the above proposals, and an online site has also surfaced, asking people to join the site as an objection to the proposals. The site is on Facebook, titled Chepstow Residents Opposed to Mounton Road Development 2024 and has 316 objectors as at 10 December 2024

It was proposed to and to then relate the results to the whole of Chepstow. It is appreciated that the sample number of dwellings is small, but it was nevertheless thought that the results would give a clear indication of the views of of the people of Chepstow as a whole.

The area chosen was a self contained area known as The estate does not overlook the Mounton Road fields, so the is not applicable. above proposals included in the RLDP.

Given the extensive opposition to the proposals from those households that were contacted, it would be fair to assume that significant further objections would be received if those

There were 7 additional signatories of people that which have been excluded from the calculation below.

The total population of Chepstow in 2021 was 11,934 (source Population Census). The average household size in Monmouthshire in 2024 is 2.28pph (source RLDP Sustainable Scoping Report Chart 30 : Number of households and household size). The above figures give the number of households in Chepstow as 5,234 (11,934 / 2.28).

18% of the population is 17 years old or younger, (source ugeo.urbistat) thus 82% of the population is 18 or over and are entitled to vote, or a total of 9,786 persons.

Of the that were contacted, replied and sign the petition. This represents 70% of the total number of dwellings of 46.

to the proposals, this gives a colossal 3,663 (total households x 70%) households of Chepstow with at least one person, as a minimum, objecting.

However, the total number of This represents an average of 1.5 persons per household contacted objecting.

When 1.5 persons per household is related to the total number of households in Chepstow, a total of 5,495 (3,663 x 1.5 = 5,495) persons, or **56% percent of the whole of the population of Chepstow of voting age objec**It is accepted that the number of households surveyed was a very small sample, and that wide errors can occur when results from a small sample are expanded to a larger population. The extent of the opposition to the above policies must not however be ignored, at the very least it can be concluded that there is a significant underlying objection by the majority of all of the residents living in Chepstow to Policies H1 and HA3.

[redacted]

	PETITION TO OBJECT AGAINST THE INCLUSION OF MOUNTON ROAD FIELDS		
	(POLICIES H1 AND HA3) IN THE RLDP		

[redacted]

No of signatories
4
2
-
2
1
1
1
1
-
1
2
1
-
-
1
2
-
2
2
-
1

St Lawrence Fields, Larkfield Roundabout Chepstow.

OBJECT TO RESIDENTIAL, HOTEL AND CARE HOME

The Replacement Local Development Plan proposes to destroy the only clear green field view when approaching Chepstow, lying between the roundabout and Mounton Road. Visually this area is fundamental as the **gateway to the Wye valley** and in confirming **the sense of place** of Chepstow as a former market town set in the countryside.

This area has been designated as a **green space/wedge** since its designation as such in the Gwent Structure Plan 1981, **some 43 years ago.**

Alternative sites are available which are **suitable, available and deliverable** and which would assist in ameliorating **traffic congestion** at the roundabout.

If you object to the above proposals, as outlined in Policy HI Settlement boundary and Policy HA3 *Land at Mounton Road, please sign the petition below.*

NAME	Address	Signature
[redacted]		

St Lawrence Fields, Larkfield Roundabout Chepstow.

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[redacted]

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[redacted]

[redacted]

Appendix : T & CP (EIA) Regs DM/2024 01242 extracts

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 SCREENING MATRIX

1. CASE DETAILS			
Case Reference	DM/2024/01242 Land At Mounton Road Chepstow Monmouthshire NP16 6AA	**Brief description of the project / development**	This assessment has been undertaken to identify as to whether Environmental Impact Assessment (EIA) is required for the:- 'Proposed new residential development'
Appellant	[redacted]		
LPA	Monmouthshire		

2. EIA DETAILS	
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?	No
If YES, which description of development (THEN GO TO Q4)	N/A
Is the project Schedule 2 development under the EIA Regulations?	Yes
If YES, under which description of development in Column 1 and Column 2?	10. Infrastructure projects Column 1:- (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas; (f) Construction of roads (unless included in Schedule 1); Column 2:- (b) (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; (ii) the development includes more than 150 dwellinghouses; (iii) the overall area of the development exceeds 5 hectares. (f) The area of the works exceeds 1 hectare.
Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?	Yes
If YES, which area?	(a) (a) The site is 850m from the River Wye SSSI and SAC (b) (b) The development site is circa 185m from the Wye Valley National Landscape AONB
Are the applicable thresholds/criteria in Column 2 exceeded/met?	No
If yes, which applicable threshold/criteria?	10. Infrastructure projects

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
7. LANDSCAPE AND VISUAL				
7.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project?[1] Where designated indicate level of designation (international, national, regional or local).	Yes	National :- The Wye Valley National Landscape AONB boundary is 185m due west of the site. The NRW LANDMAP landscape character area is the Caerwent Hinterland An analysis of the relevant sensitivity appraisals from LANDMAP information indicates that the LCA has been evaluated as; Historic Landscape; 83% High and 13% Moderate Cultural Landscape; 20% Outstanding and 45% Moderate Landscape Habitats; 86% Moderate Geological Landscape; 47% High, 45% Moderate Visual and Sensory; 55% High and 35% Moderate Landscape and visual MNMTHVS044 Chepstow woods The site area covers 12.8ha Local:- The site is fully within the current LDP LC6 Chepstow, Pwllmeyric and Mathern Green wedge. The green wedge objective is to ensure settlements do not coalesce and	Yes	It is considered that there will be a significant adverse impact or change as a result of the proposal. The site is within a highly a valued landscape character in Monmouthshire in terms of its status, landform, scenic quality, biodiversity, GI and wide ranging historic and cultural links. The aim of an Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process. Consideration should also be given to the cumulative impact of the proposal on Monmouthshire's landscape, the rural character of the area and values placed on that character. Policy LC5 Protection and Enhancement of landscape character highlights that proposals must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection Consideration should be given to the effects of the proposal on the Landscape Character Areas, views from the highway and

[1] See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
		protect landscape and open countryside from development encroachment To the north of the site lies CADW listed St Lawrence house. The building has a visual and setting relationship with the parkland landscape to its south162m to the south of the development site lies CADW registered Grade II Wyelands historic landscape park 500m to the west of the site lies CADW registered Mounton house parks and gardens boundary.		the impact on GI connectivity. The applicant proposes an LVIA and lighting strategy to accompany application along with landscape proposals and subsequent management.
7.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	Yes	The proposed location will be visible from:- The A466 from east. Immediately adjacent Chepstow settlement edge residential areas. From the north immediately adjacent From the east 30m From nearest PROW circa 300m to proposed dwellings. NCN 4 runs along Mounton road and A466 The land form is such that the site is at circa 96mAOD with land and field gradients falling to the west and south circa 77mAD . Development of 1,2,2.5 and 3 storey with commercial being potentially higher will be visible within the landscape to the west looking back towards Chepstow. Intervisibility from settlements such as:- Mounton circa 850m Pwllmeyric circa 850m to settlement edge and PROW network and principle road corridors should be considered not just for daytime visual impact but also night time light.	Yes	An appropriately scaled impact assessment will need to be undertaken to accompany a planning application in the form of a LVIA to assess the cumulative visual impacts of the development and lighting (day and night) as well as include an environmental colour assessment Consideration needs to also be undertaken in the context of the following policy • Future Wales • PPW Edition 12 • LDP S1 Strategic policy • LDP S13 Policy Landscape, Green Infrastructure and the Natural Environment • LDP Policy GI1 Green Infrastructure • LDP LC5 – Protection and enhancement of Landscape character • LDP SDI – Renewable Energy • MCC Green Infrastructure SPG 2015

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
		Currently settlement edge south of St Lawrence is set back from the open fields and separated by road and trees, light spill being less prominent in the landscape.		• LDP DES1 General Design Considerations • EP3 Lighting
8. CULTURAL HERITAGE/ARCHAEOLOGY				
8.1 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).	Yes	To the north of the site lies CADW listed St Lawrence house. The building has a visual and setting relationship with the parkland landscape to its south162m to the south of the development site lies CADW registered Grade II Wylands historic landscape park 500m to the west of the site lies CADW registered Mounton house parks and gardens boundary.	Yes	Likely heritage impact on setting of St Lawrence and relationship with parkland setting.
9. TRANSPORT AND ACCESS				
9.1 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	The proposal will have an impact on the immediate local highway network the A466 and A48 (local and trunk road and the High Beach roundabout (trunk) a detailed and robust transport assessment will be required to support an application. The application will also affect existing active travel and sustainable transport provision	Yes	Transport and access assessment will be required
9.2 Are there any transport routes on	?	Yes High Beach Roundabout (Trunk Road)	Yes	Transport and access assessment will be

12. CUMULATIVE EFFECTS				
12.1 Could this project together with existing and/or approved development result in cumulation of impacts together	?	It is unlikely that the project will have a significant cumulative impact in association with existing and or approved development.	Yes	

Question	(Part 2a) / (Part 2b) – Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) – Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
during the construction/operation phase?		However it would be likely that the scale of the development would have a significant cumulative impact in association with existing and or approved development especially in the context of:- • Any improvements to the roundabout and feed in roads at the junction of the A466 and A48 • Cumulative and enhanced light spill into open countryside and landscape setting • Development into green wedge extending settlement boundary towards nearby settlements The close proximity of numerous European protected sites and populations of protected/important fauna means that the 'incombination' effects of residential developments should be assessed.		

TO POLICY H1 and HA3

APPENDIX :
HISTORIC PLANNING POLICY

Contents : PPW Extracts

Gwent Structure Plan 1991 - 2006

MCC Adopted Local Development Plan 2011 - 2021

Planning Policy Wales Edition 11 February 2021

Managing Settlement Form – Green Belts and Green Wedges

3.64 Around towns and cities there may

be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.

3.68 Green wedges are local designations which essentially have the same purpose as Green Belts. They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. Green wedges should be proposed and be subject to review as part of the LDP process.

3.73 When considering applications for planning permission in Green Belts or green wedges, a presumption against inappropriate development will apply. Substantial weight should be attached to any harmful impact which a development would have on the purposes of Green Belt or green wedge designation.

[redacted]

Development in the Countryside

3.60 Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.

Supporting Infrastructure

3.61 Adequate and efficient infrastructure, including services such as education and health facilities along with transport, water supply, sewers, sustainable waste management, electricity and gas (the utilities) and telecommunications, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.

3.62 Planning authorities should, in conjunction with key providers, take a strategic and long term approach towards the provision of infrastructure as part of plan making. This may involve collaboration between planning authorities and key infrastructure providers to ensure infrastructure provision is sustainable, fit for purpose and can be co-ordinated and timed to support placemaking aspirations.

3.63 Development should be located so that it can be well serviced by existing or planned infrastructure. In general this will involve maximising the use of existing infrastructure or considering how the provision of infrastructure can be effectively co-ordinated to support development plans. Infrastructure choices should support decarbonisation, socially and economically connected places and the sustainable use of natural resources.

Managing Settlement Form – Green Belts and Green Wedges

3.64 Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.

GWENT

STRUCTURE PLAN 1991 - 2006

Green Areas

C1 IN ORDER TO PREVENT THE COALESCENCE OF URBAN AREAS THROUGHOUT THE COUNTY, "GREEN SPACES" WILL BE IDENTIFIED IN LOCAL PLANS WITHIN WHICH THERE WILL BE A PRESUMPTION AGAINST URBAN DEVELOPMENT. IN PARTICULAR, EXTENSIVE "GREEN SPACES" WILL BE IDENTIFIED BETWEEN THE URBAN AREAS OF:

i) NEWPORT AND CARDIFF (COUNTY BOUNDARY);

ii) NEWPORT AND CAERLEON;

iii) MALPAS AND CAERLEON;

iv) MALPAS AND CWMBRAN;

v) CAERLEON AND CWMBRAN;

vi) BETTWS AND CWMBRAN;

vii) ROGERSTONE AND BETTWS;

viii) ROGERSTONE AND RISCA;

AND TO SEPARATE URBAN AREAS BETWEEN NEWPORT AND CHEPSTOW.

C2 IT IS INTENDED THAT LOCAL PLANS WILL IDENTIFY A CONTINUOUS "GREEN ZONE" IMMEDIATELY NORTH OF THE M4 MOTORWAY BETWEEN LANGSTONE AND CHEPSTOW WITHIN WHICH THERE WILL BE A PRESUMPTION AGAINST URBAN DEVELOPMENT.

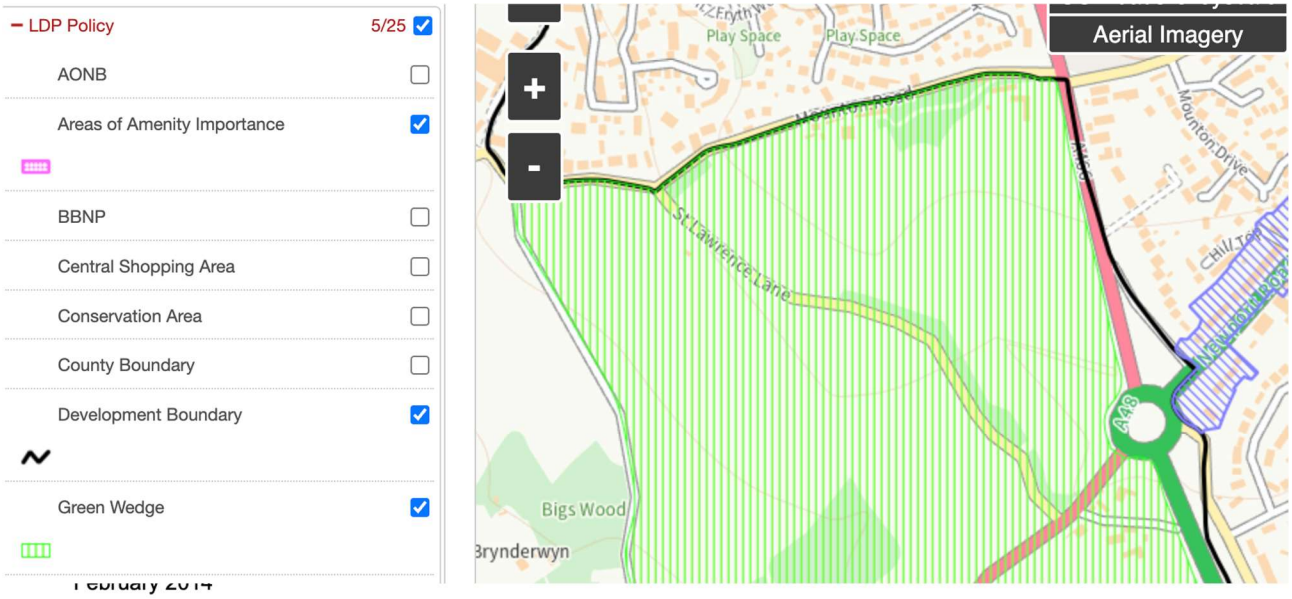
5.6 A primary intention of the Plan is to control urban sprawl and the above policies are among several which will constrain the options available for new development. The County Council considers that there is a need to define and maintain gaps of open countryside between urban areas where there is a risk of coalescence. Within these Green Spaces it is intended to retain an open rural character by permitting only agricultural, forestry, recreational or other uses which involve no substantial new building which has a significant landscape impact. It is also intended that development which is permitted will be of a high quality bearing in mind their visibility from urban areas and major routes. Mineral working is not necessarily incompatible with these policies.

5.7 The Green Spaces are shown diagrammatically on the Key Diagram. Local Plans are to define detailed boundaries, taking account of the need to allow for long term developments. The reference to "extensive" implies a width sufficient to provide a meaningful countryside gap. It is also intended that they should have a permanence beyond the period to which the Structure Plan relates. It will be noted that this policy closely resembles one for Green Belts. In scale and encircling continuity most of the Gwent Green Spaces may not be comparable with Green Belts, but it is not intended to preclude the option of designating a Green Belt. For example this may be

MONMOUTHSHIRE COUNTY COUNCIL
ADOPTED LOCAL DEVELOPMENT PLAN

2011-2021

Adopted 27 February 2014



proposals within Green Wedges will only be permitted where they do not prejudice the open characteristics of the land.

Policy LC6 – Green Wedges

In order to prevent the coalescence of the settlements listed below, the areas between them are identified as Green Wedges, as shown on the Proposals Map:

- **a) Undy, Llanfihangel Rogiet**
- **b) Rogiet and Caldicot;**
- **c) Portskewett and Sudbrook**
- **d) Shirenewton and Mynyddb**
- **e) Chepstow, Pwllmeyric and Mathern.**

6.3.47 Planning policy guidance regarding development in Green Wedges is contained in Planning Policy Wales, 2012 (paragraphs 4.8.14/18 refer). Exceptionally, development may be considered acceptable in a Green Wedge where the proposal complies with Policy E2 or is necessary to implement a transport scheme identified in Strategic Policy S16.

3195

Mark Cottle

View results

Respondent

395 Anonymous

241:22

Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- (●) Yes
- ( ) No

9. Is your representation in support or objection? *

- (●) Support
- ( ) Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

I broadly support the summary statements about key issues, challenges, vision. However I have concerns about how these are translated into detail in the plan and how they might be interpretted in future.

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

11. Would you like to comment on this question *

- ( ) Yes
- (●) No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

12. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

13. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

16. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

17. Would you like to comment on this question *

- ◉ Yes
- ○ No

18. Is your representation in support or objection? *

- ◉ Support
- ○ Objection

19. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Public transport facilities and Active Travel routes should be specific bullet points within the infrastructure list and not just lumped within "Transport infrastructure" - unless they are what's referred to as "blue" and "green" infrastructure, in which case it needs to be made clearer. (In general 'buzzword' headings such as green and blue should be avoided in favour of clear categorical descriptors.

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

20. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

21. Would you like to comment on this question *

- ◉ Yes
- ○ No

22. Is your representation in support or objection? *

- ◉ Support
- ○ Objection

23. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

The park and ride facility must be as closely integrated as possible with the exisiting station NOT a separate facility with connecting paths. Ideally there should be an arrangement where buses can pull up directly alongside the island (northbound) platform for direct rail-bus interchange. Buses would enter by a slip road and downward ramp off the northbound A465. They would then exit either through another ramp and slip back on to the northbound A465 or loop around through an underpass beneath the A465 and up a ramp to an exit arrangement integrated into the park-and-ride (which could be simply a southbound slip). If it's possible to upload documents with this response I'll use that to submit a better explanation. If not, I'll try to make a separate submission.

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

25. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

27. Would you like to comment on this question *

- [x] Yes
- [ ] No

28. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

29. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.
*

In S13, it is insufficient to address Sustainable Transport by "Promoting and prioritising" active travel and "Maintaining and improving on the Active Travel Network Maps...". There must be some firm commitment to putting resources into active travel infrastructure, whether through Section 106 agreements or from other indentified sources of funding.
In ST1 the statement, "Financial contributions may be required for safety/congestion mitigation measures, or towards improvements to the highway network and sustainable travel", shoul dbe changed to ""Financial contributions will be required..."

Meanwhile, I strongly support policy ST3 and would ask that road/rail transfer points (existing and potential) be specifically identified in the same way that potential major housing and business development sites are identified in, for example S8. There should also be support and provision for infrastructure necessary for electric rail freight (see: http://www.airburst.co.uk/markcottle/blog/2023-08-17.htm)

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

30. Would you like to comment on this question *

- [ ] Yes
- [x] No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

31. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

32. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

33. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

34. Do you consider that the Plan is sound? *

- [x] Yes
- [ ] No

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

35. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- [x] Yes
- [ ] No

36. If you wish to speak at a hearing session which language would you wish to use?

- [ ] Welsh
- [x] English

Part 5: Welsh Language

37. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I think the plan is sufficient in this respect

38. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

3215

Jonathan (Jonty) Pearce

Archived: 17 February 2025 08:01:54
From: [redacted]
Mail received time: Mon, 18 Nov 2024 16:23:03
Sent: Mon, 18 Nov 2024 16:22:45
To: MCC - PlanningPolicy
Subject: FW: Negative impact on Greater Horseshoe Bats from the Monmouthshire RLDP
Importance: Normal
Sensitivity: None
Attachments:
CS0270-Technical-Objections-Version-1-6.pdf;

Dear Planning Policy at Monmouthshire

Please find attached a copy of a letter that I have written to Natural Resources Wales about the Negative impact on Greater Horseshoe Bats from the Monmouthshire RLDP.

Kind regards

[redacted]

Dear Natural Resources Wales

Please could you confirm receipt of this letter.

I am writing this letter to express my concern for the protection for the Endangered Greater Horseshoe Bats as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP).

In particular, I refer to site allocation HA4 on Dixton Road, Monmouth. This is a high density housing site comprising of 270 Houses on 12.5 Hectares (20 football pitches) of Prime Agricultural Land. This site is also known as Candidate Site CS0270, Land at Leasbrook and Land East of Monmouth.

The site is situated 950 metres from the Newton Court Site of Special Scientific Interest (SSSI) for Bats. It is part of the Forest of Dean and Wye Valley Bat Sites Special Area of Conservation and is a European Natura 2000 site.
Newton Court Stable Block SSSI houses a maternity roost of the Endangered (Red List) Greater Horseshoe Bats as well as Lesser Horseshoe Bats. The site is heavily protected by Law.

It is one of only 3 sites in Wales for the Greater Horseshoe Bats and the only one in Monmouthshire. These bats are now considered extinct or very rare in Netherlands, Belgium and Germany. The conservation status is considered unfavourable across all of Europe apart from Britain and the Black Sea.

The 3Km Core Sustenance Zone for Greater Horseshoe Bats

The HA4 housing site is well within the 3Km Core Sustenance Zone for the Greater Horseshoe Bat and the 2Km Zone for the Lesser Horseshoe Bat as identified by the Bat Conservation Trust. I believe that both Natural Resources Wales and the Future Wales National Plan 2040 recognise the 3Km Cores Sustenance Zone for Greater Horseshoe Bats.

Monmouthshire County Council has overlooked an alternative candidate site for housing (CS0270 Land Of Wonastow Road, Monmouth) that is outside of the 3Km Core Sustenance Zone.

Monmouth's Greater Horseshoe Bats rely on the fields and hedgerows of site HA4 for feeding and

commuting.

They rely on dung insects from cattle grazing (the primary use of the fields today) as well as hedgerow insects.

High density housing development on site HA4, Dixton Road, Monmouth would

- Remove a feed source for the bats by removing 12.5 hectares of grazing land (fewer dung insects)
- Rip out established hedgerows (more habitat loss)
- Add in artificial light making it easier for predators such as owl to spot the bats
- Interrupt established commuting lines

The Council and Developer have said that they will mitigate the effects by establishing a buffer zone (which the bats already have), installing special street lights and planting some trees.

I cannot see how this could be viewed as a biodiversity net gain.

The Sweetman Ruling

In April 2018, the European Court of Justice (ECJ) issued a decision in the case of "People over Wind, Peter Sweetman v Coillte Teoranta (C-323/17). The ruling confirmed that mitigation measures cannot be taken into account for the purposes of screening under the UK Habitats Regulations, which give effect to the EU habitats directive (92/43/EEC). This ruling is still in force, even post Brexit.

I am not a legal expect but it appears that given a choice of sites Monmouthshire County Council, when considering the impact on the Greater Horseshoe Bats should have selected a site at the screening phase that did not require mitigation measures.

I believe that they should have selected a site outside of the 3Km Cores Sustenance Zone (Please see Pages 18 to 21 of my attached report).

- Candidate Site CS274 Wonastow Road is outside of the 3Km zone and would require no mitigation measures for Greater Horseshoe Bats.
- Site HA4 Dixton Road does require mitigation measures through planting trees and installing special street lighting). As a result, it should have been screened out.

On this basis the CS0274 Site at Wonastow Road, Monmouth should have been selected in preference to the HA4 Dixton Road Site.

A Ecological Report Supplied by Redrow Homes

The decision to select a housing development site within the 3Km Core Sustenance Zone as specified in the Monmouth Shire County Council Habitats Regulation Assessment, was based on an Ecological Report supplied by Redrow Homes. Because the report was provided by the developer questions could arise about the independence of the report.

The Ecology Report indicated that there was "limited bat activity" on the site CS0270 (now known as HA4).

Many residents, who attended a public meeting, reported bat activity across a wide area of the Dixton Road and Hereford Road areas of Monmouth.

I live next to the site and during evenings is summer, I regularly see the Greater Horseshoe Bats flying next to the proposed site. I have taken videos of them (which I can supply if you would like). In the attached report you will see a freeze frame shot.

I also have a bat survey report that was undertaken on my house as part of a planning application. This showed that on the night of the survey Greater Horseshoe Bats were detected 7 times in one evening.

The ecological report and may have a number of flaws.

1. The report seems to cover a much larger area than CS0270/ HA4. Original proposals for development were for a 40+ hectare site. I suspect that this report was for the larger site area. This may explain the lack of detail within

the report and the absence of data for bat sites 7 and 8 in the report.

2. 6 bat detectors were used to detect bats. Only one was placed on candidate site CS0270/ H4 (at location 5). The other detectors were placed closer to the bat roost.

3. The report highlights that the fields in CS0270 were being used to graze sheep throughout the measurement period. The fields are usually used for grazing cattle. Cow pats can host high numbers of important dung beetles which the bats swoop down on and eat as they fly.

4. Most of the measurements were taken in the colder nights of April, May and June (when due to the cold evenings you would expect lower bat activity). Dung beetles make up a large part of the diet of Greater Horseshoe Bats, particularly in the late Summer.

5. No mention was made on the height of the hedges on the proposed site (H19, H20 and H21), but most of the other hedges were given heights. We know that Greater Horseshoe Bats like high hedgerows. It could be that there was hard cutting of hedges that year and they were cut lower than normal. This would then reduce hedgerow insects, and hence the number of bats spotted. By observation, the hedgerows on the site are normally at least 2 metres high.

6. The report talks about a 1Km Core Sustenance Zone for the Juvenile Greater Horseshoe Bats. The Bat Conservation Trust undertook a review of all available literature that reported the results of radio-tracking studies while bats were tracked while foraging, from both the UK and Europe. They concluded that the Core Sustenance Zone was 3Km (making no mention of a separate juvenile zone).

I can supply you with a copy of the Ecological Report.

The safest way to safeguard the Greater Horseshoe Bats would be to have a fully independent and comprehensive survey of the bats – across both locations HA4 (Dixton Road) and CS0274 (Wonastow Road).

The Gwent Wildlife Trust are familiar with the wildlife of Monmouth and are well respected in the local area. It is possible that they could be approached to do conduct an ecological survey. If they are unable to do, then they may be able to suggest a suitable body.

I would urge you take address these concerns in your response to the RLDP, and to share them with any other bodies.

I am sending similar versions of this letter to Natural England (Wye Valley Bat Sites), Future Generations Commissioner for Wales, Planning Directorate for Wales, The Bat Conservation Trust, Gwent Wildlife Trust and Monmouthshire County Council.

The Greater Horseshoe Bats delight the residents of Monmouth at dusk. Let's keep it that way for our future generations.

Yours sincerely

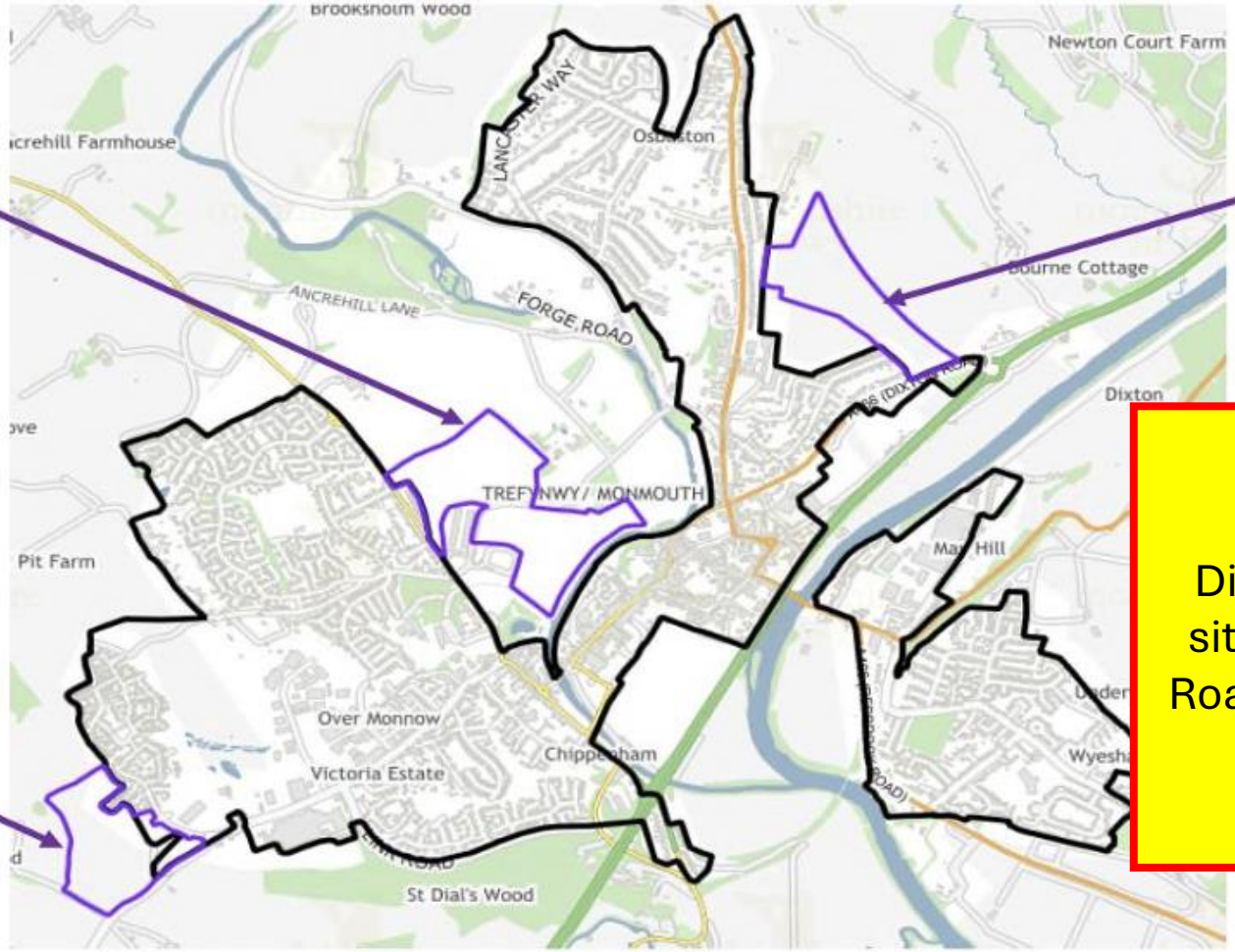
[redacted]

Detailed analysis of adverse effects on the environment , visual impact and landscape sensitivity of developing Land at Dixton Road (HA4/CS0270)

A view of Candidate Site HA4 from the Hereford Road, Monmouth.

Version 1.6 – 18 November 2024

In September 2023 Scrutiny Committee Meeting, Monmouthshire Council highlighted three candidate sites



Land at Vauxhall Fields

Mixed use Resi led scheme : 179 residential units

Care home, car park, community park & hub

CS0270

Land at Dixton Road

270 residential units

CS0274

Land at Wonastow Road

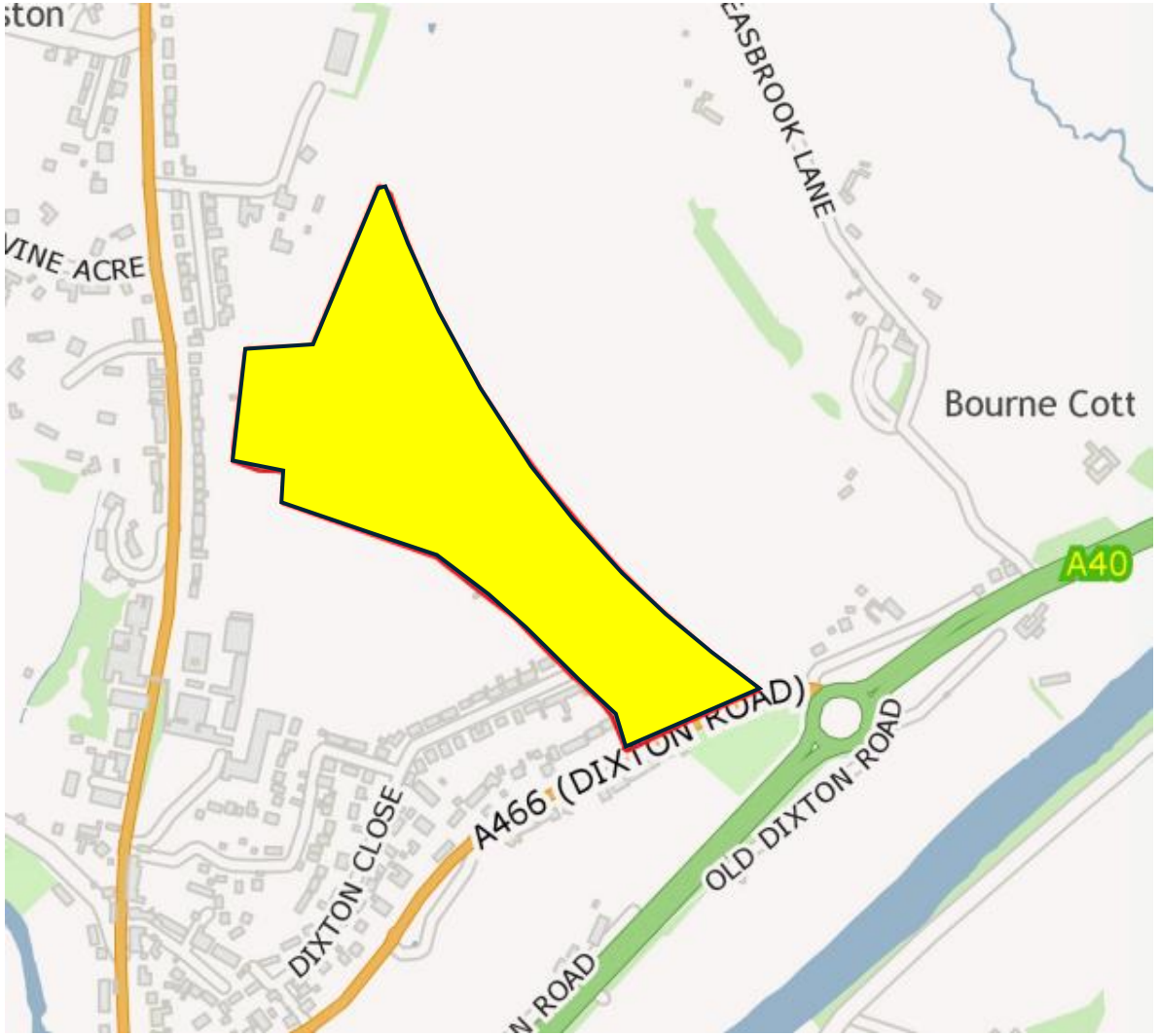
Mixed use: 175 residential units

2.6ha employment land

They Chose the Dixton Road, Monmouth site, when the Wonastow Road Site would have been more suitable

[Source: Reports Pack to Scrutiny Committee 28 Sep 2023 - (Public Pack)Agenda Document for Place Scrutiny Committee, 28/09/2023 10:00 (monmouthshire.gov.uk)]

The Dixton Road Site is a Sensitive Site



- Ecologically Sensitive
- Landscape Sensitive
- Historically Sensitive
- Traffic Sensitive

- 12.5 Hectares
- Size of 20 football pitches
- 270 Houses
- 405 Cars [9]
- 618 Residents [7]
- 266 dogs [8]
- 232 cats

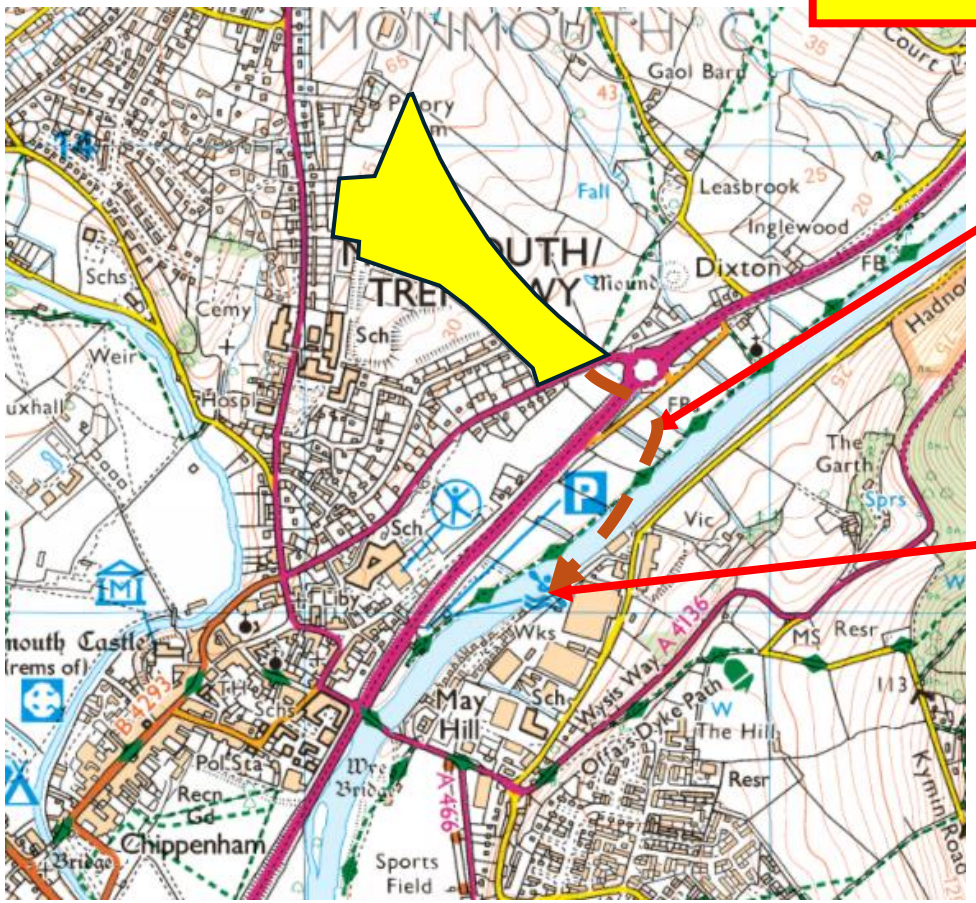
[Sources [7] People per household in Monmouthshire is 2.29 – Welsh Government [Average household size (persons) by local authority and year (gov.wales)
[8] Cats per household 0.861. Dogs per household 0.987 So 266 dogs and 232 cats. - Figures from Defra for NP25 postcode [Dogs per household per postcode district - data.gov.uk and Cats per household per postcode district - data.gov.uk]
[9] Average of 1.5 Cars her household in Monmouthshire [[OC] Average number of cars per household, England & Wales, Census 2021 : r/dataisbeautiful (reddit.com)]

The Golden Rule of Water Quality

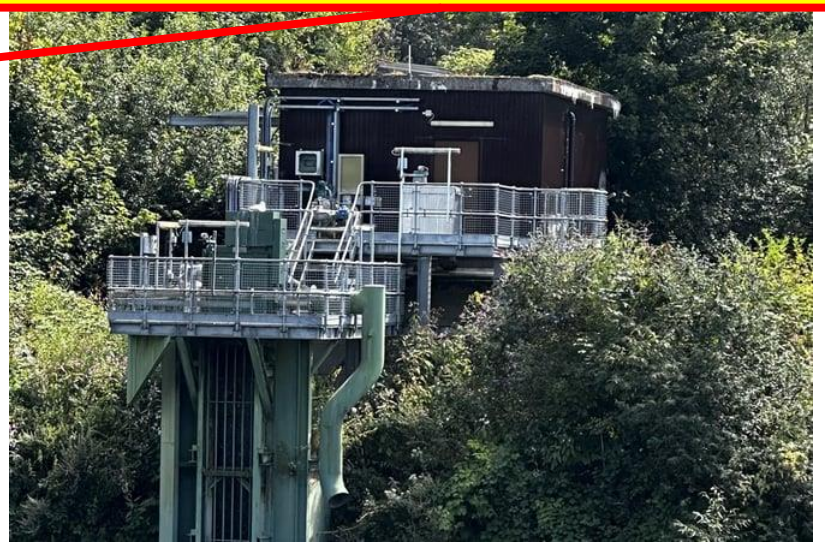
- You extract your drinking water **Upstream** from where you live
- If there is any runoff pollution, it does not pollute your water supply

Monmouth's drinking water comes from the polluted River Wye

Surface runoff pollution from the CS0270 site enters the River Wye near Dixton Church



Welsh Water extract Monmouth's Drinking Water 400 metres downstream (near the Rowing Club)



1. Drinking Water Contamination
Monmouth's Water is already under two notices from the Drinking Water Inspectorate

Monmouth's drinking water comes from the polluted River Wye

It is already under two notices from the Drinking Water Inspectorate

- Risk of crypto breakthrough through existing treatment processes into final water. (Potential for elevated levels of Cryptosporidium due to its presence in the raw water). [4]

- Potential risks from Taste, Odour, Pesticides, Pollution [5]

dwi

guardians of drinking water quality

DRINKING WATER INSPECTORATE

The Drinking Water Inspector has mandated two upgrades to Monmouth (Mayhill) Welsh Water Treatment Works. These upgrades are not due to be completed until March 2028, and following a period of Monitoring will not be signed off - by the Drinking Water Inspector until March 2030.

Monmouthshire Beacon

www.monmouthshirebeacon.co.uk

FOREST OF DEAN GAZETTE

Wednesday 21st August 2024 £1.50

Students celebrate A-level success pages 4-5

Nearly £60k spent on Gypsy site search page 14

Sunshine and smiles at county show pages 18-19

Town shock as drinking water supply on notice

Des Pugh

A MONMOUTH resident was shocked to discover that Monmouth's water supply has been under notice from the Drinking Water Inspectorate (DWI) since October last year.

Welsh Water was issued a notice by the DWI in 2023 citing four significant risks associated with the Monmouth treatment works and its potential impact on public health.

The notice issued specifies several strategic actions with set deadlines to identify and confirm solutions to mitigate pollution, pesticides, and taste and odour risks at Monmouth and Court Farm Treatment Works (Pontrilas) by March 2025 and complete planning, design and construction of solutions by March 2028 for Monmouth.

The notice requires Dwr Cymru monitor and regularly review trends in consumer contacts in the Monmouth / Trelech water supply zone and investigate any issues regarding taste and odour in those supply zones.

The drinking water supply for the town is sourced upstream of the Wye. The water comes out of the Wye near to Natural Resources Wales (the environment agency) in Hadnock Road and is pumped down to the Welsh Water Mayhill Treatment works. It is then pumped up to the reservoir on the Kymin and then across the Wye Bridge into Monmouth.

Dwr Cymru themselves identified risks in reports dated July 29, 2022 and April 26, 2023 indicating that the water supply from these works could pose dangers to human health due to potential contamination from taste, odour, pesticides, and pollution.

Residents are also concerned about additional pollution from a "candidate site" to build 270 houses at the top of Doton Road. The site is prone to any garden runoff from these houses ending up in the River Wye close to Doton Church, just 400 metres upstream from where Dwr Cymru extract the drinking water.

This news comes just weeks after Welsh Water were fined £104K for polluting the River Wye from the Kingstone and Madley Sewage Treatment Works in Herefordshire.

The Environment Agency prosecuted the utility for breaching the conditions of an environmental permit between August 2020 and June 2021.

Welsh Water Ltd entered a guilty plea at Worcester Crown Court and were fined £60,000 for exceeding permitted levels of sewage effluent into the River Wye.

Welsh Water's extraction point

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[Source: News article – Monmouthshire Beacon]

Source :

[4] DWI Notice about Cryptosporidium April 2024 DWR-2023-00011 [https://www.dwi.gov.uk/water-companies/improvement-programmes/dwr-cymru-welsh-water-improvement-programmes/dwr-2023-00011/]

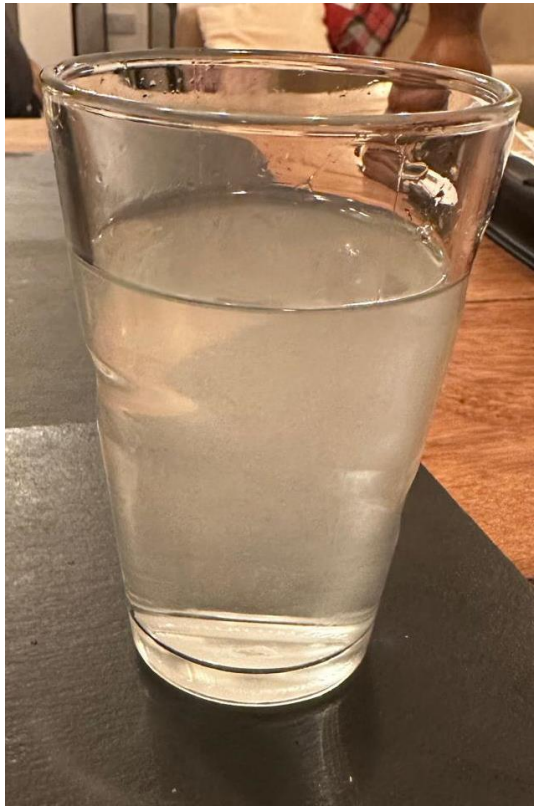
[5] DWI Notice - Monmouth Treatment Works and Court Farm Treatment Works Abstraction Risks Supply System WR 2023 00003 October 2023 [https://www.dwi.gov.uk/water-companies/improvement-programmes/dwr-cymru-welsh-water-improvement-programmes/dwr-2023-00003-v1/]

Monmouth's Water is Very Susceptible to Runoff Pollution

- **Freedom of Information Request**
  The first notice was following a taste and odour event in June 2021, in which 73 consumers reported an unusual taste and/or odour downstream of these two works.

- The cause was a contamination of **hydrocarbons and volatile fatty acids** on the River Wye although no conclusive pollution source was identified

dwi
guardians of drinking water quality
DRINKING WATER INSPECTORATE



It was described in the Water Inspector's annual report as "a sudden change in river quality resulted in **one of the most significant taste and odour events in Monmouth, Wales for over a decade**"

2. Surface Runoff Polution

CS0270 site will increase the amount of pollutants (particularly Phosphates) entering the River Wye in Monmouth

Rainwater runoff from the site flows into the brook network near Dixton Church and then into the River Wye – 400 metres upstream from where Welsh Water take Monmouth's drinking water.

Surface Runoff Pollution regularly flows into the River Wye

[Resident Photo taken on Hereford Road 21 September 2024]

Sources of domestic phosphate pollutants in rainwater runoff [6]

- Weedkillers and pesticides
- Cleaning products
- Cat and dog poo
- Road salt
- Decomposition from compost heaps and fallen leaves.

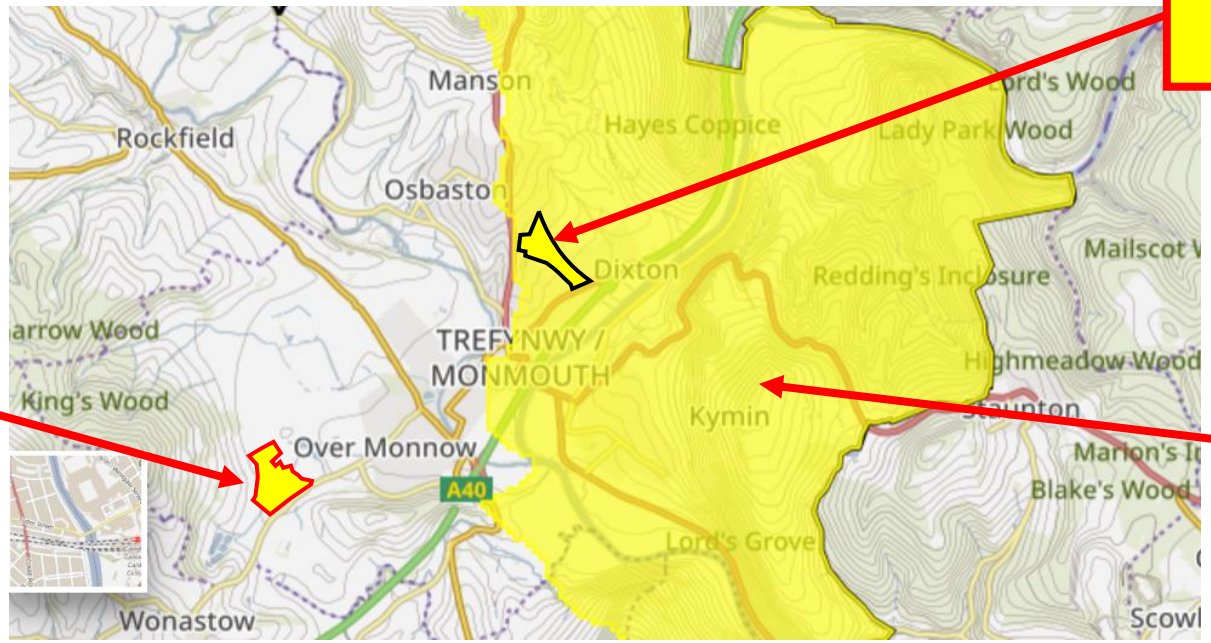
[Source: [6] Minnesota Stormwater Manual]

3. Raising Phosphate Levels in the River Wye

One half of Monmouth is in the River Wye Special Area of Conservation for Phosphates

Compliance Assessment of Welsh River SACs against Phosphorus Targets

Site CS0274



Candidate Site CS0270

This side of the River Wye catchment is failing Phosphate Targets

Source: Datamap Wales - https://datamap.gov.wales/layergroups/inspire-nrw:ComplianceAssessmentOfWelshRiverSacsAgainstPhosphorusTargets

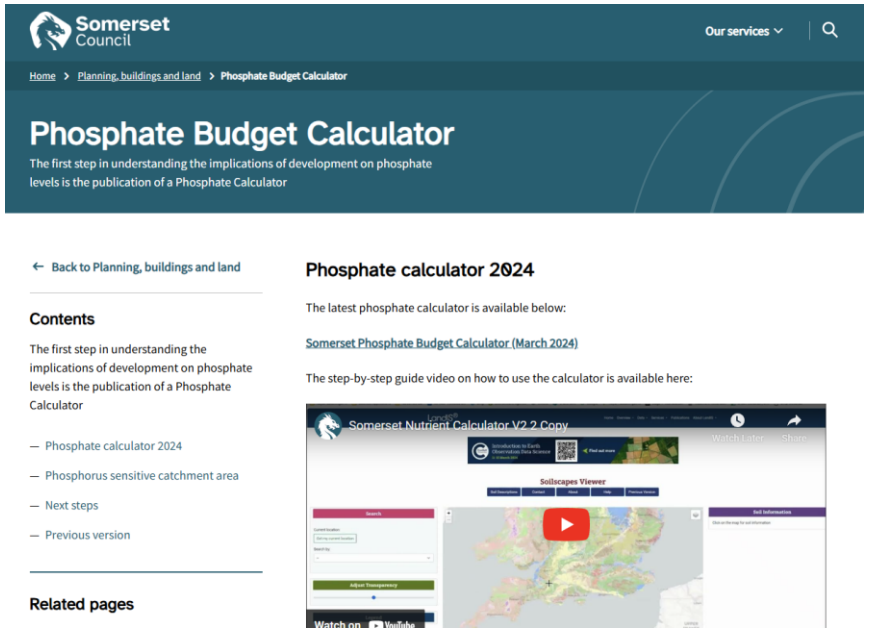
Raising Phosphate Levels in the River Wye

We have carried out calculations for Phosphates in surface water runoff for the site.

Current Phosphate Runoff from Agriculture (Cattle Grazing)
8Kg of Phosphates

Phosphate Runoff from Site CS0270 (including use of SuDS)
16Kg of Phosphates

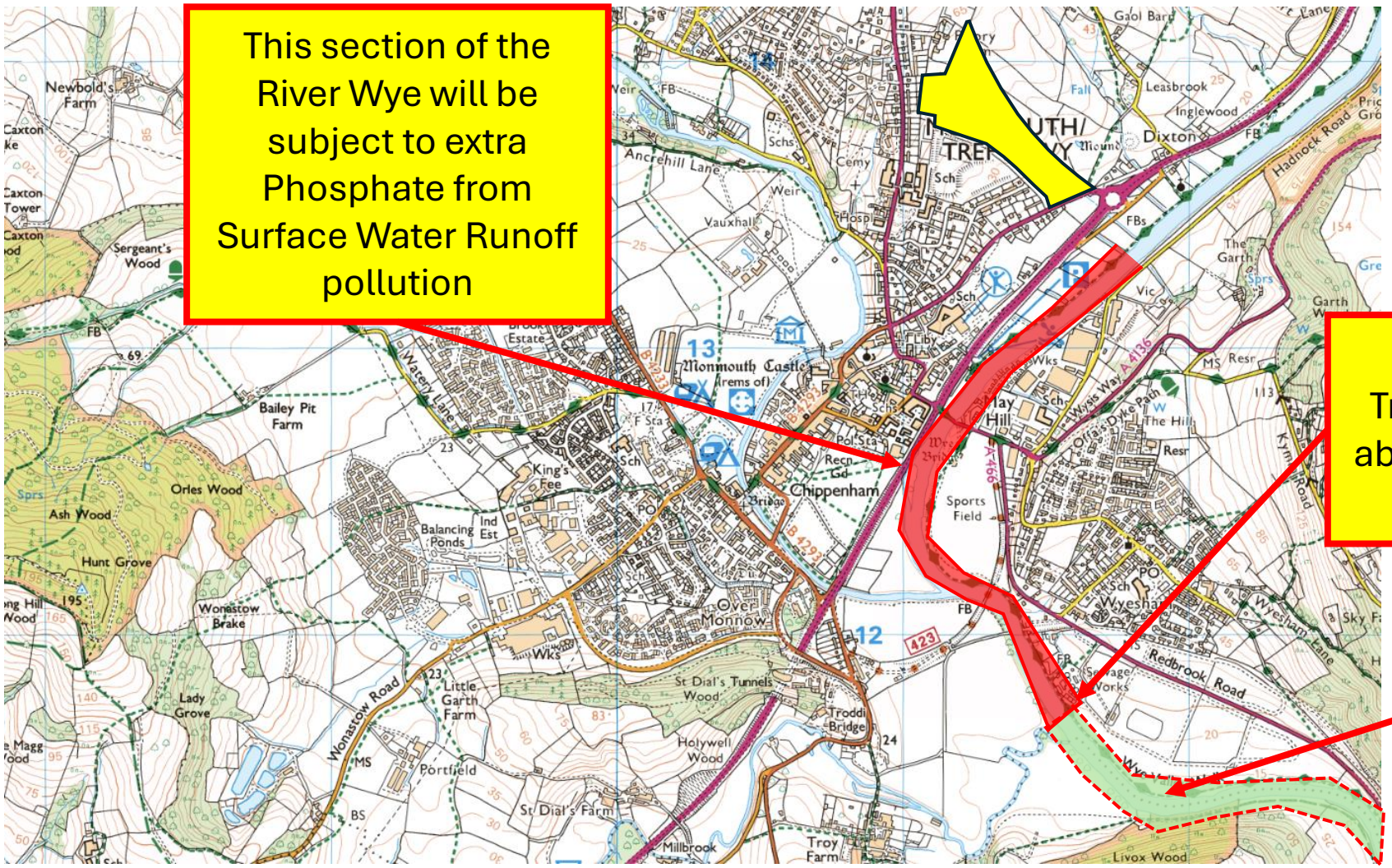
Increased Phosphate Runoff entering the River Wye
= 16Kg – 8Kg = 8Kg of Extra Phosphates



We have used the Somerset Phosphate Calculator as it is the closest to Monmouth. Monmouthshire Council do not have a Phosphate Calculator online. We entered in the number of houses, soil type and use of SuDS.

[Source: Phosphate Budget Calculator (somerset.gov.uk)]

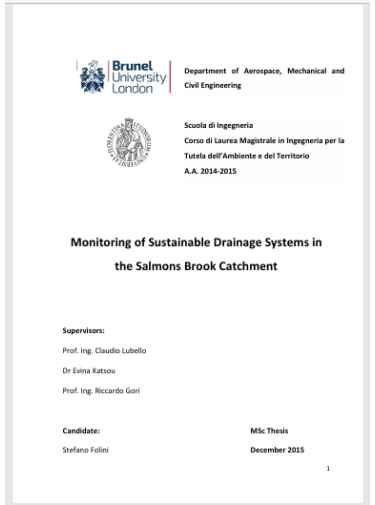
The Upgrade to Welsh Water Waste Treatment Works only benefits the River Wye DOWNSTREAM of Monmouth



4. Sustainable Drainage Solutions (SuDS) are not effective on Phosphates

- The developer has proposed a SuDS system to remove pollution. SuDS does not remove much phosphate and does not work well on our impermeable clay soil and steep slopes.

Average Phosphate Removal of 15% - 24%



Brunel University London

Department of Aerospace, Mechanical and Civil Engineering

Scuola di Ingegneria
Corso di Laurea Magistrale in Ingegneria per la Tutela dell'Ambiente e del Territorio
A.A. 2014-2015

Monitoring of Sustainable Drainage Systems in the Salmons Brook Catchment

Supervisors:
Prof. Ing. Claudio Lubello
Dr Evina Katsou
Prof. Ing. Riccardo Gori

Candidate: Stefano Folini
MSc Thesis
December 2015

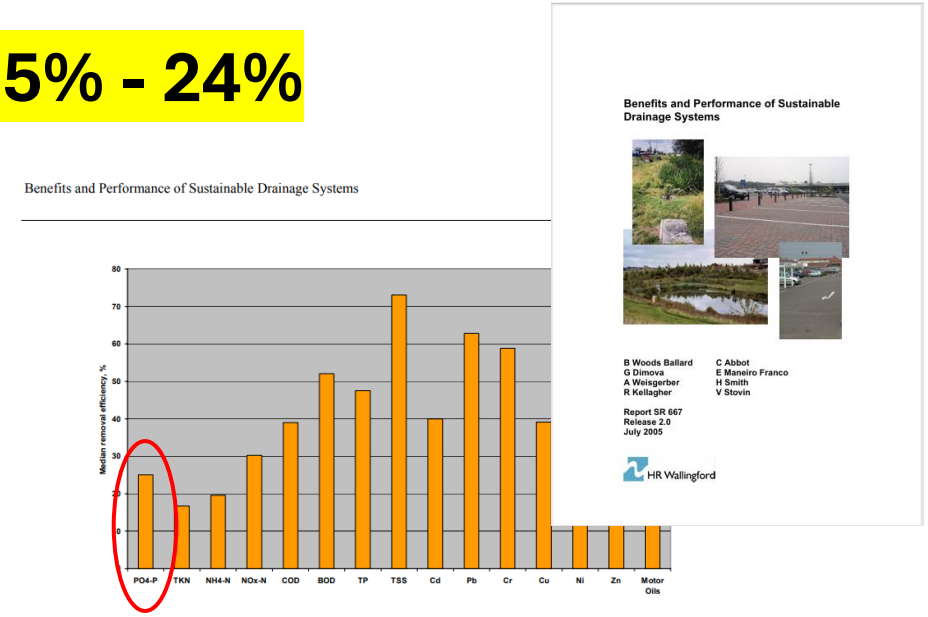
A Brunel University report looks at the effectiveness of SuDS

- "The phosphate removal is not working as well as the other nutrients, since the average removal is only 15.2%".

  "This is in line with what has been registered in the other case studies."

"The SuDS are working quite well, with the exception of the total phosphate levels that are harder to reduce."

[Source - Monitoring of Sustainable Drainage Systems in the Salmons Brook Catchment]



Benefits and Performance of Sustainable Drainage Systems

Figure 1.4 Median removal efficiencies of retention ponds

Ponds in general provide longer detention times than wetlands, and are therefore expected to be more effective in promoting sedimentation as the fastest mechanism for

Benefits and Performance of Sustainable Drainage Systems

B Woods Ballard, G Dimova, A Weisgerber, R Kellagher, C Abbot, E Maneiro Franco, H Smith, V Stovin

Report SR 667
Release 2.0
July 2005

HR Wallingford

This HR Wallingford report shows a 24% removal of Phosphates by SuDS

[Source: HR Wallingford Report – Benefits and Performance of Sustainable Drainage Systems]

SuDS Works Better on the Free Draining Soils at Wonastow Road

Will the ground accept water?

According to the **British Geological Survey**
"For infiltration based SuDS to drain effectively, the topsoil and the underlying geology need to be free draining".

"Sands and gravels, for example, are generally more permeable than silts and clays."

[Source: British Geological Survey https://www.bgs.ac.uk/geology-projects/suds/]

[Source: Landis Soilscapes Viewer - https://www.landis.org.uk/soilscapes/]

The Dixton Road Soil is Impermeable and Not Free Draining

Resident Photo taken Feb 2024 about 24 hours after heavy rain
Note the red clay colour of the runoff water

5. Traffic Congestion on Traffic Hotspot (Dixton Roundabout)

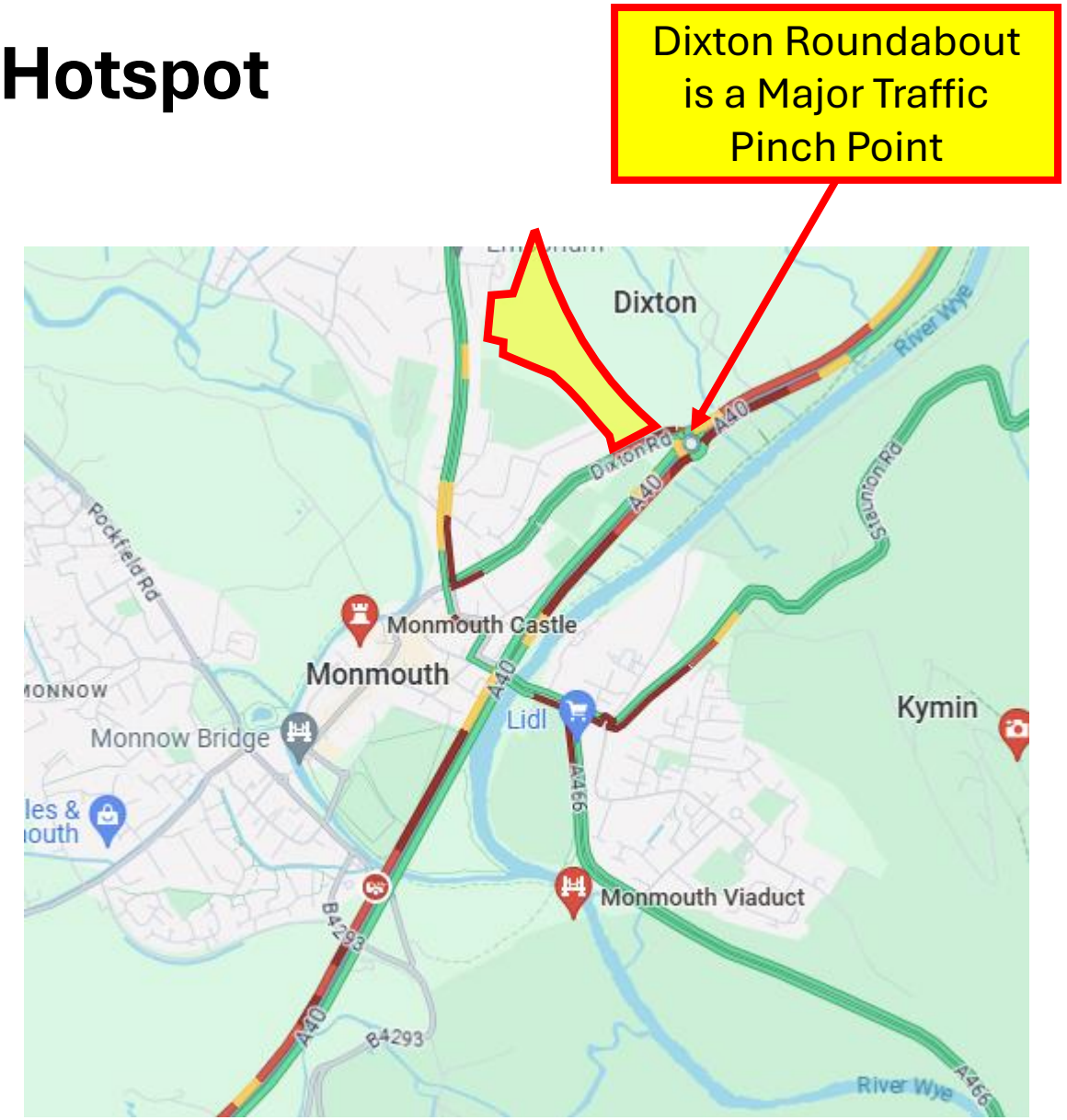
- The entrance to the candidate site (CS0270) is only 100 metres from the Dixton roundabout, which is a major pinch point for Monmouth. Monmouth already has very difficult traffic due to difficult geography

- 270 new houses would mean an increase of 405 vehicles entering the Dixton Road.

- Researchers for the Gateway to Wales Action Group have calculated that 270 households would increase the Motoring population of Monmouth 405 cars. This would add 362 more journeys onto the Dixton Road. This is in addition to the 4,490 vehicles per day already travelling on the Dixton Road and the 36,760 vehicles per day driving along the A40.

- A Simple journey from Monmouth to Wyesham (less than a mile) often takes 20 minutes or more. Our calculation shows that this could increase by 10 minutes during busy periods.

- Based on the average annual mileage, that would create an additional 476 tonnes of the greenhouse gas CO2 per year, as well as increasing the level of air pollution.

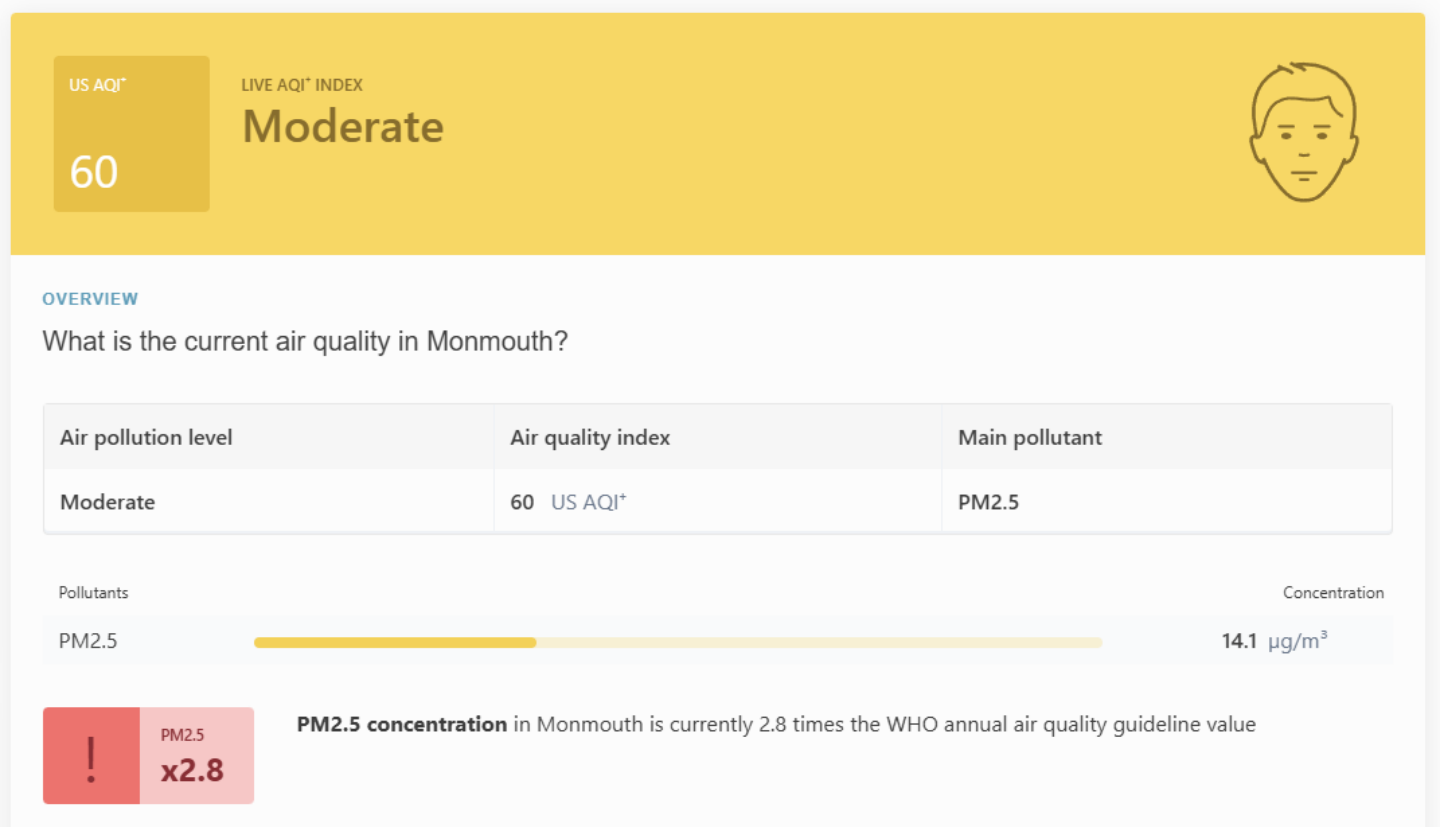


[9] Average of 1.5 Cars her household in Monmouthshire [[OC] Average number of cars per household, England & Wales, Census 2021 : r/dataisbeautiful (reddit.com)]
[10] Road Traffic statistics for A40 and A466 Department for Transport [Road traffic statistics - Manual count point: 40510 (dft.gov.uk) and Road traffic statistics - Manual count point: 70074 (dft.gov.uk)]
[11] Net out-commute of around 2,800 residents per day -Monmouthshire County Council Our Local Transport Plan 2024 – 2029 Page 21 PowerPoint Presentation (monmouthshire.gov.uk)

6. Air Pollution

- Monmouthshire County Council only monitor NO2 levels. The nearest monitoring station MM13 Pike House, Dixton Road recorded average levels for 2022 of 24.4 µg/m3 (far in excess of the WHO guidelines of 10 µg/m3). PM2.5 and PM10 particles are more dangerous and low levels of exposure can cause health problems.

- Why does the Council not Monitor the more dangerous PM2.5 and PM10 particulate levels, particularly given the proximity of the Dixton Road development to Monmouth Comprehensive School?



PM2.5 Monitoring Station in Drybridge Street. Situated some distance from the A40/ A466 this regularly shows PM2.5 levels higher than WHO Guidelines.

[Source: Monmouth Air Quality Index (AQI) and United Kingdom Air Pollution | IQAir]

7. Residents from the Dixton Road Site Will Rely on the Car as Active Travel is Difficult

- The Dixton Road site is 2km from the town centre and nearest shop
- The site is up a steep slope
- Nearest cycle path is more than 2km away
- Cycling involves using the A466 Dixton Road – a major arterial road with over 4,400 vehicles using the route every day

Resident Photo showing typical traffic at the Dixton Road Site entrance. Not the sort of Road you would want to cycle on!

8. Loss of habitat for Endangered Greater Horseshoe Bats

The site is within the Core Sustenance Zone of 3km for Greater Horseshoe Bats.

Newton Court, Monmouth is one of only three sites in Wales and the only one in Monmouthshire.

Building housing will

- Remove 20 football pitches of grazing land
- Rip out established hedges
- Add artificial light
- Interrupt Bat Commuting Lines

- **How can this possibly be a Biodiversity Net Gain?**

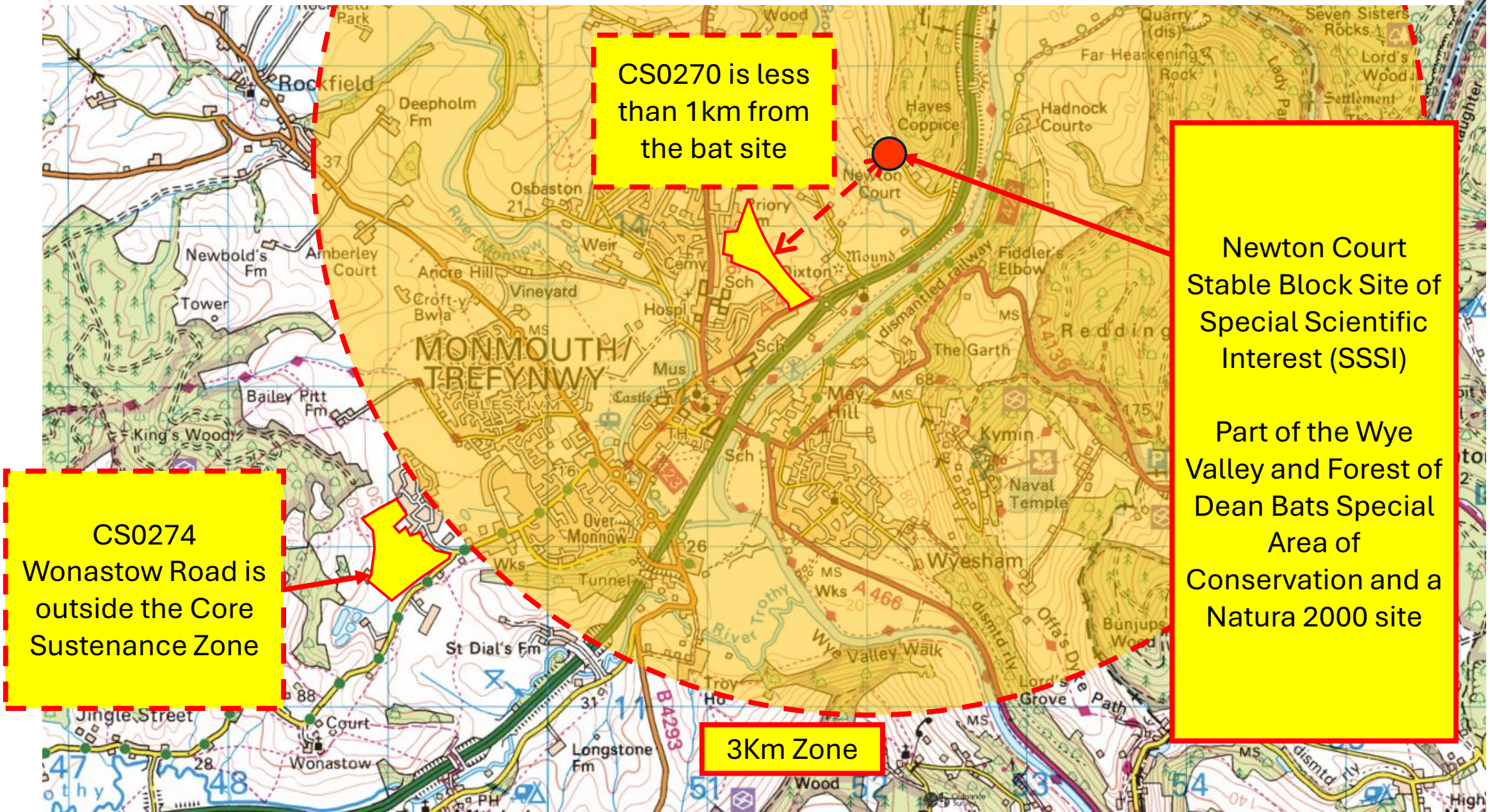
[Source Site Improvement Plan: Wye Valley and Forest of Dean Bat Sites - SIP267 (naturalengland.org.uk)]

[Source : Core Sustenance Zones and habitats of importance for designing Biodiversity Net Gain for bats – Bat Conservation Trust]

Horseshoe Bats are regularly seen in Gardens along the Hereford Road in Monmouth

[Photo - A freeze Frame photo of a Greater Horseshoe Bat taken on 27th July in a garden on the Hereford Road, Monmouth.]

The 3Km Core Sustenance Zones for Horseshoe Bats



Greater Horseshoe Bats rely on Grazing Land (Dung Insects) and Hedgerows

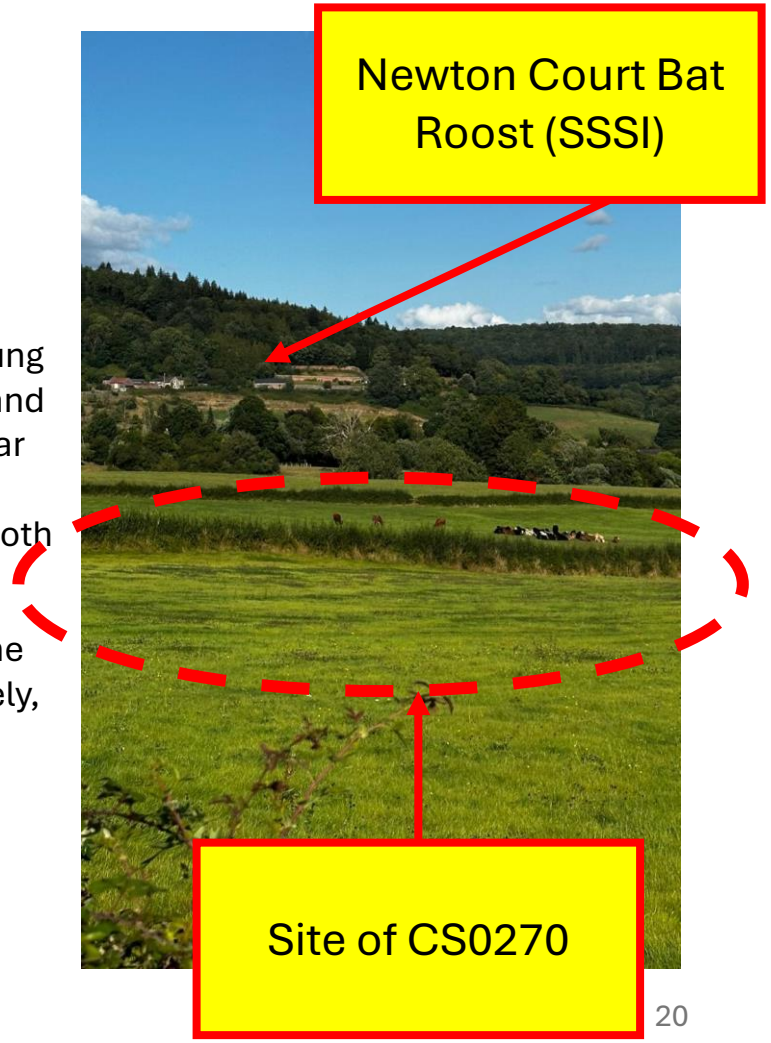
The site is within the Core Sustenance Zone of 3km for Greater Horseshoe Bats.

The development site is only 1km from the bat roosts.

"Juvenile Greater horseshoe bats forage on dung beetles extensively, so factors affecting quality of dung such as cattle numbers and use of pesticides can also impact on populations. Unimproved pasture and woodland are important habitats for sustaining dung beetle, chafer and large moth populations. Linear landscape features such as hedgerows are also important. A landscape of permanent pasture and ancient woodland, linked with an abundance of tall bushy hedges, is the ideal habitat as it provides both their insect food and the linear features used as flight paths. "

"The effective conservation of the Greater horseshoe bat depends on the sensitive management of the farmed and forested landscape around maternity roosts and other sites used by the bats. Cumulatively, changes in agricultural management including: abandonment of grazing land; use of pesticides; hedgerow removal; can impact both horseshoe bat species".
[Source Site Improvement Plan: Wye Valley and Forest of Dean Bat Sites - SIP267 (naturalengland.org.uk)]

[Source : Core Sustenance Zones and habitats of importance for designing Biodiversity Net Gain for bats – Bat Conservation Trust]



Monmouthshire Council has a legal obligation to protect biodiversity

The Environment (Wales) Act 2016

- "Public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so promote the resilience of ecosystems"

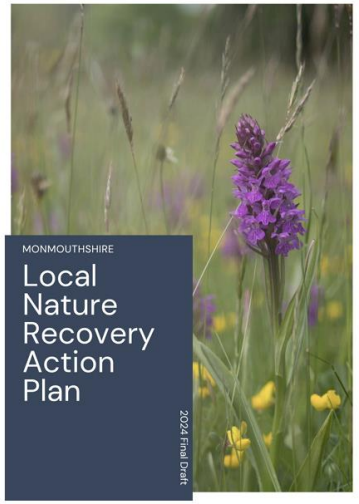
Development on the CS0270 site will degrade feeding opportunities for the endangered Greater Horseshoe Bats and will reduce biodiversity

THE ENVIRONMENT (WALES) ACT 2016

The Environment (Wales) Act 2016 puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way.

BIODIVERSITY AND RESILIENCE OF ECOSYSTEMS DUTY

Section 6 under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) for public bodies. The duty requires that public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so promote the resilience of ecosystems.



"Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to seek to maintain and enhance biodiversity where it is within the proper exercise of their functions. In doing so, public authorities must seek to promote the resilience of ecosystems. This means that Monmouthshire County Council must take a pro-active approach to improve and not reduce biodiversity when carrying out its functions."

[Source: Monmouthshire Local Nature Recovery Action Plan]

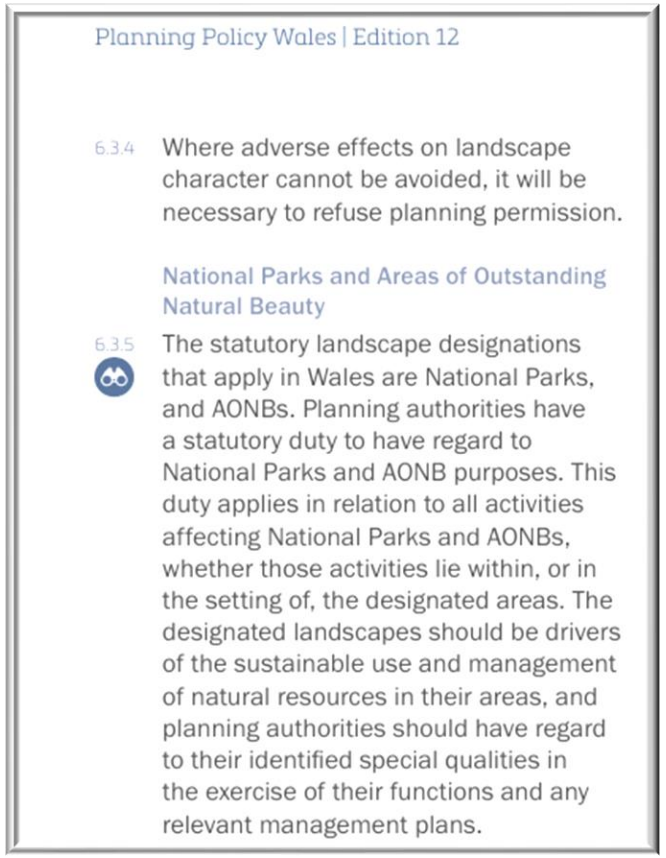
9. Site is Within the "Setting" of the Wye Valley Natural Landscape (AONB)

- A "Setting" is an area outside of an AONB (a buffer zone) that impacts the AONB.

- Planning Policy Wales Says "Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas."

  "National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the highest status of protection from inappropriate developments."

  "**Major developments should not take place in National Parks or AONBs except in exceptional circumstances."**



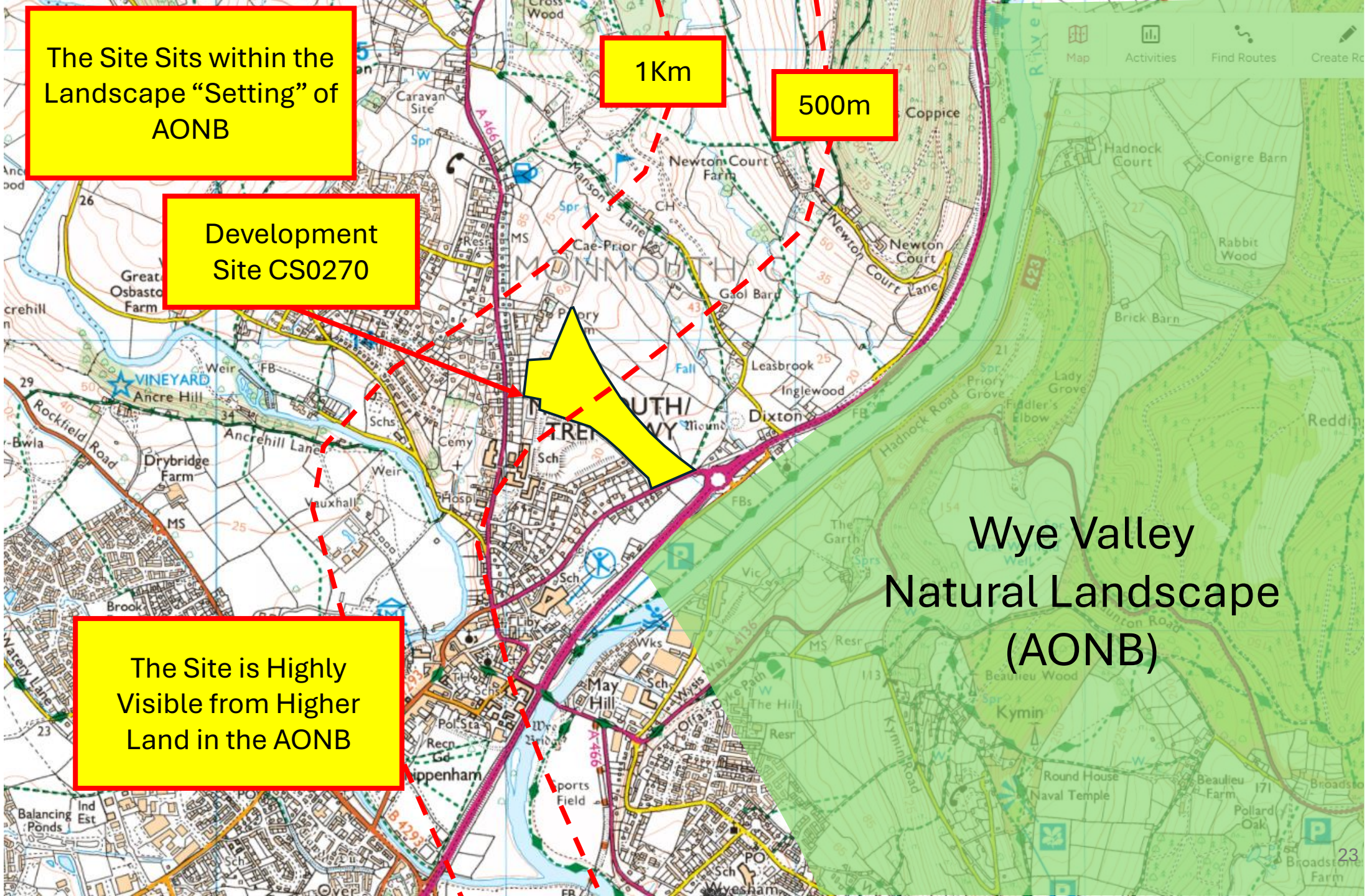
Planning Policy Wales | Edition 12

6.3.4 Where adverse effects on landscape character cannot be avoided, it will be necessary to refuse planning permission.

National Parks and Areas of Outstanding Natural Beauty

6.3.5 The statutory landscape designations that apply in Wales are National Parks, and AONBs. Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas. The designated landscapes should be drivers of the sustainable use and management of natural resources in their areas, and planning authorities should have regard to their identified special qualities in the exercise of their functions and any relevant management plans.

[Source : Planning Policy Wales Edition 12 – sections 3.3.5 to 6.3.10]


The Site Sits within the Landscape "Setting" of AONB
1Km
500m
Development Site CS0270
The Site is Highly Visible from Higher Land in the AONB
Wye Valley Natural Landscape (AONB)
Map
Activities
Find Routes
Create Ro
Caravan Site
Newton Court Farm
Newton Court
Newton Court Lane
Coppice
Cae-Prior
Gaol Bard
Leasbrook
Inglewood
Dixton
Hadnock Court
Conigre Barn
Rabbit Wood
Brick Barn
Great Osbaston Farm
VINEYARD
Ancre Hill
Rockfield Road
Ancrehill Lane
Drybridge Farm
Weir
Cemy
Hosp
Sch
Lady Grove
Fiddler's Elbow
Hadnock Road
The Garth
Kymin
Round House
Naval Temple
Beaulieu Farm
Pollard Oak
Broadstone Farm
May Hill
Sports Field
Balancing Ponds
Ind Est
Wyesham
Pol Sta
Recn Gd
Brook
Watery Lane
Rivers

Example of an AONB Setting - Chilterns AONB

- A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB).
- The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary.
- Large growth proposals even far away can have an impact on the AONB, and so fall within the setting.

[Source: 2019-2024_Chilterns_Management_Plan_DEVELOPMENT_compressed.pdf]

BEFORE DEVELOPMENT IN THE SETTING OF THE AONB

This green field at Alscot outside the AONB, and the view to the hill and panoramic views from the top of Whiteleaf Hill, will be lost to development under plans for a 2,500 home urban extension of Princes Risborough.

AFTER DEVELOPMENT IN THE SETTING OF THE AONB

This "after" example from Chinnor (Former Garden Centre Site) shows how development can harm the view to the AONB. The edge of Chinnor is now very visible from the Thame Road, Emmington Road and the public footpaths in between. The density and the alignment with the houses tightly packed in a row, and lack of screening planting contribute to the negative effect on views towards the escarpment.

View of Monmouth from AONB at Wyesham - A Beautiful Pastoral Scene

View of Monmouth from AONB at Wyesham
- A Blighted view from Development in the Setting

10. The development site is within the "Setting" of a Scheduled Monument

Development within 500 metres of a Scheduled Ancient Monument (Dixton Mound).

Cadw's rules (Setting of Historic Assets in Wales) state [3]

"Local planning authorities must consult the Welsh Government's Historic Environment Service (Cadw) on all planning applications which in their opinion are within the setting of a scheduled monument."

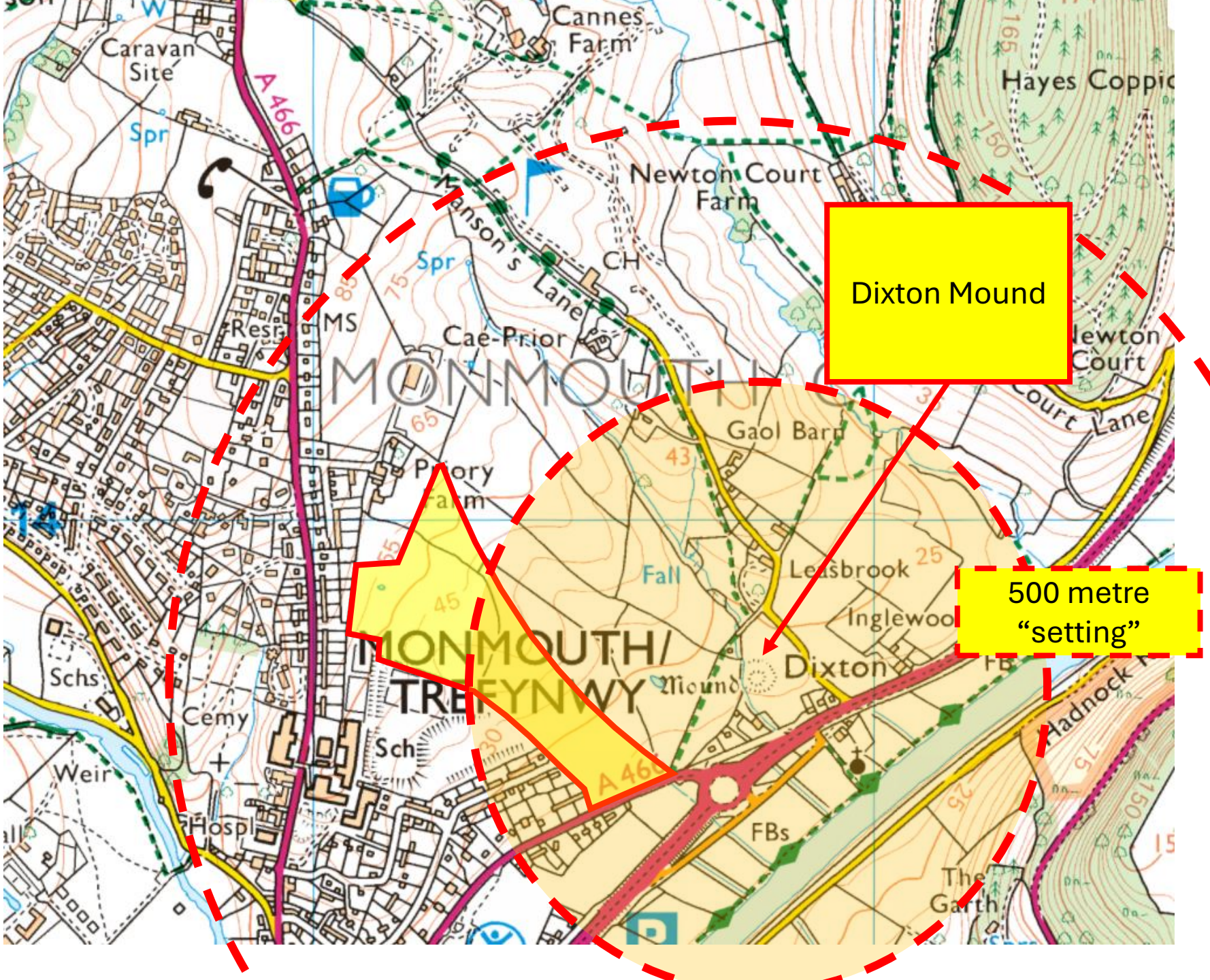
Criteria

Development likely to be visible from a scheduled monument and which meets the following criteria:

• it is within a distance of 0.5 kilometres from any point of the perimeter of a scheduled monument [3]

Dixton Mound seen from the Hereford Road [1]
The field in the front of the picture is the development site
[Source:] Wikipedia Photo]

[2] Technical advice note (TAN) 24: the historic environment [https://www.gov.wales/technical-advice-note-tan-24-historic-environment]
[3] Setting of Historic Assets in Wales [3https://cadw.gov.wales/sites/default/files/2019-05/Setting%20of%20Historic%20Assets%20in%20Wales%20EN.pdf]



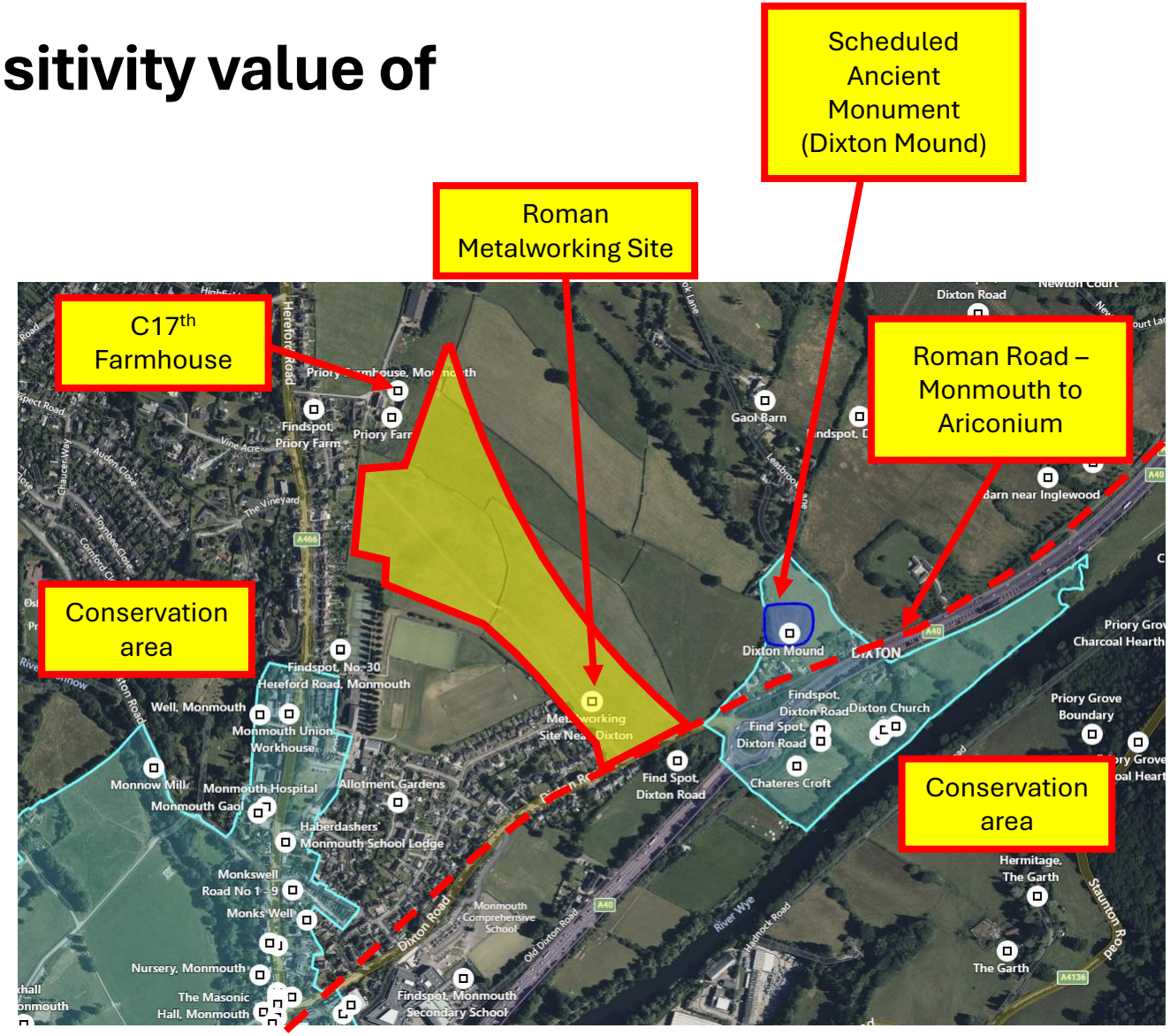
Dixton Mound is a Norman earthwork motte, founded by William fitz Osborn.

Excavations revealed occupation in the 11th and 12th century.

1000 metre "setting" for sites over xxx hectares

Historically Sensitive:
The site has a LANDMAP sensitivity value of Outstanding/High for historical interest.

- Originally the farmland for the world-famous Monmouth Priory.
- The land was unusual in that being Priory Land it was exempt from Tithes.
- CS0270 contains a roman ironworking site
- It is visible from two Conservation Areas an AONB and a Scheduled Ancient Monument



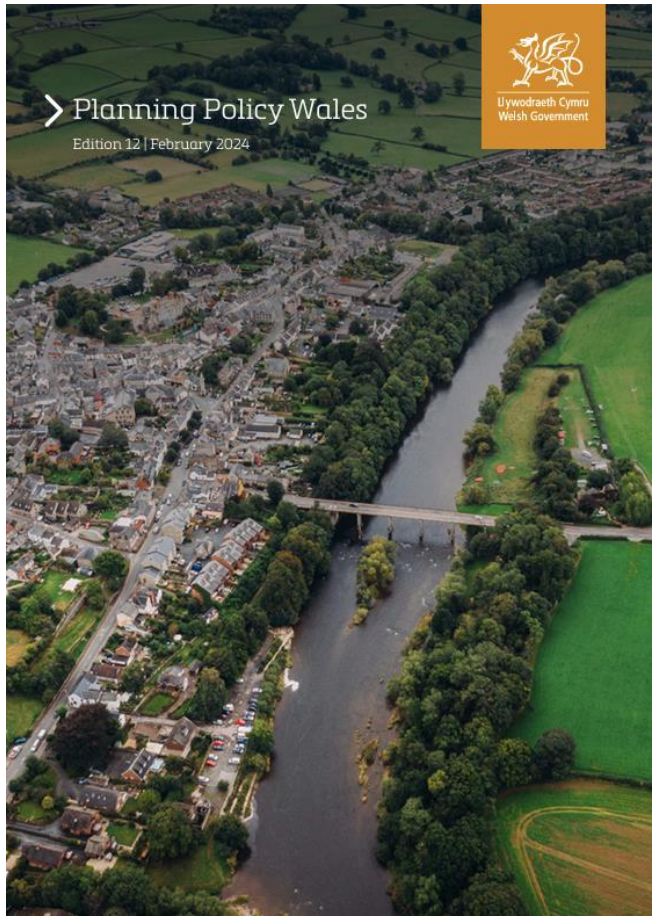
[Sources: Map https://archwilio.org.uk/her/chi3/arch.php?county=Glamorgan%20Gwent%20Archaeological%20Trust=&lang=eng]
[Roman road – Monmouth – Ariconium Roman Road in South East Wales Glamorgan – Gwent Archalogical Trust]

11. Loss of Prime Agricultural Land

Welsh Planning Rules State

'...agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future.'

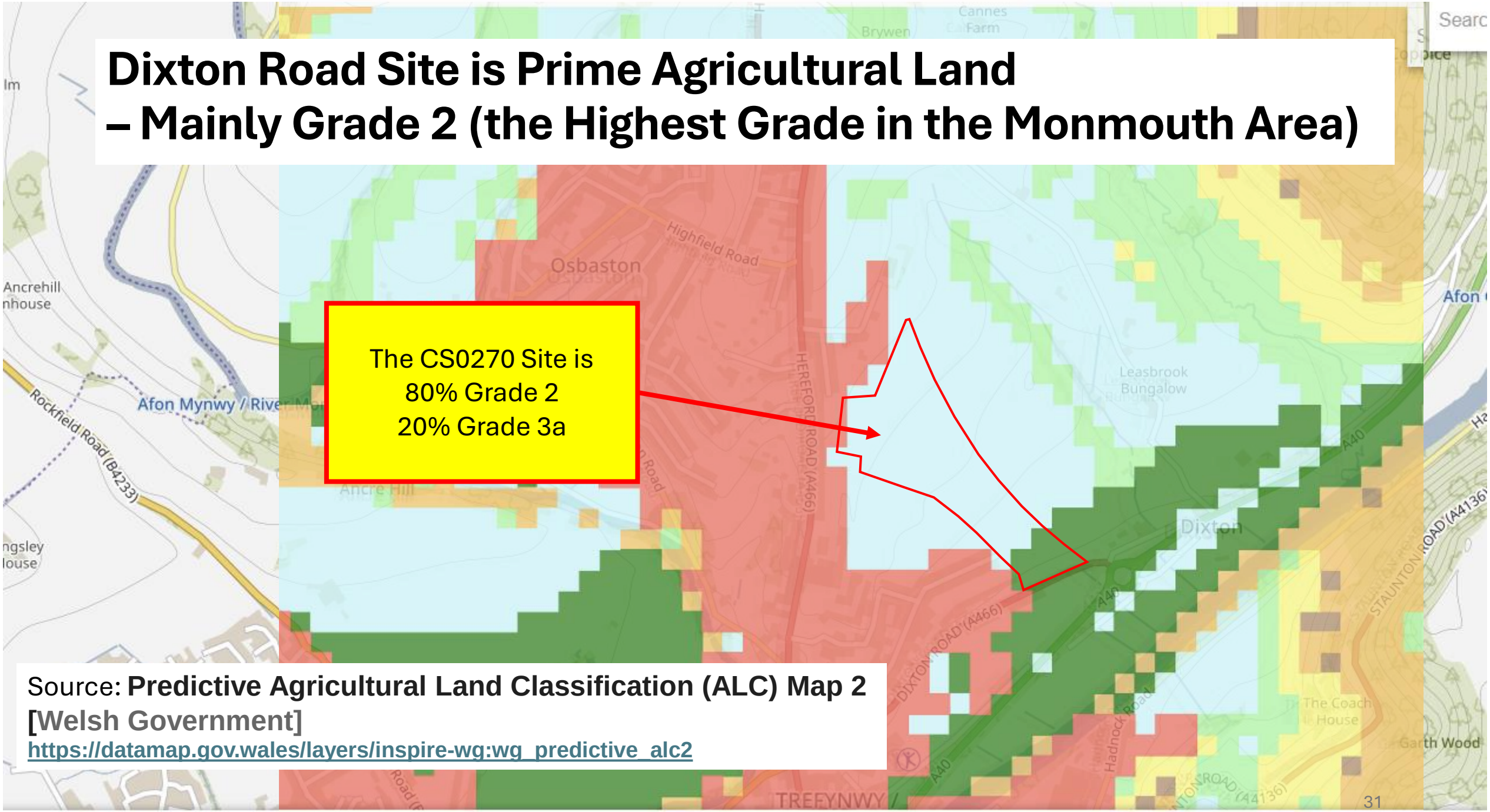
'If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, **development should be directed to land of the lowest grade**'.



Planning Policy Wales – Edition 12

[Source: Planning Policy Wales - Edition 12 (gov.wales)]

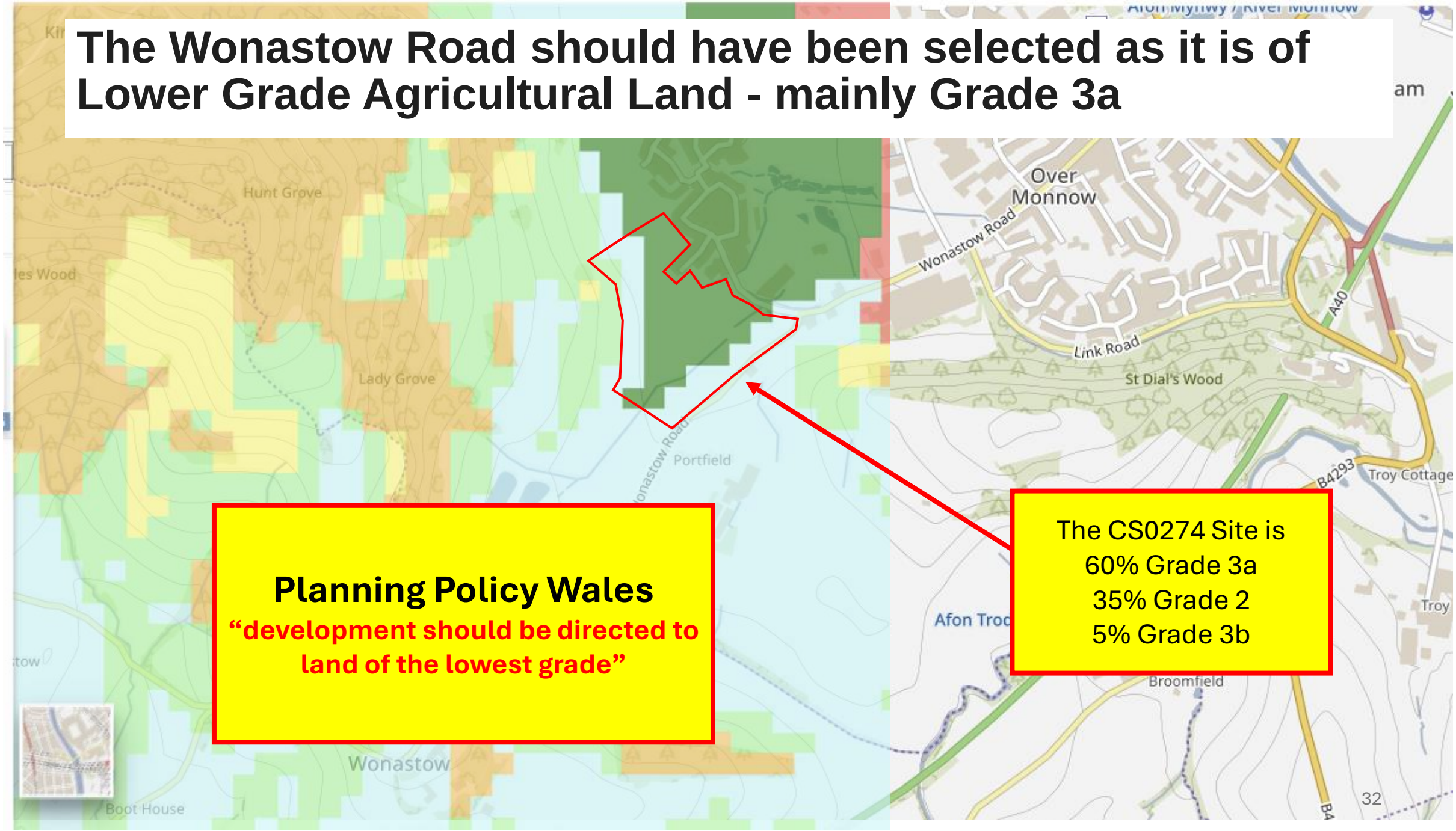
Dixton Road Site is Prime Agricultural Land – Mainly Grade 2 (the Highest Grade in the Monmouth Area)



Source: **Predictive Agricultural Land Classification (ALC) Map 2 [Welsh Government]**
https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2

024 OS 100021874, viaEuropa: © 2024 Europa Technologies Ltd. All rights reserved.

The Wonastow Road should have been selected as it is of Lower Grade Agricultural Land - mainly Grade 3a



Planning Policy Wales

"development should be directed to land of the lowest grade"

The CS0274 Site is
60% Grade 3a
35% Grade 2
5% Grade 3b

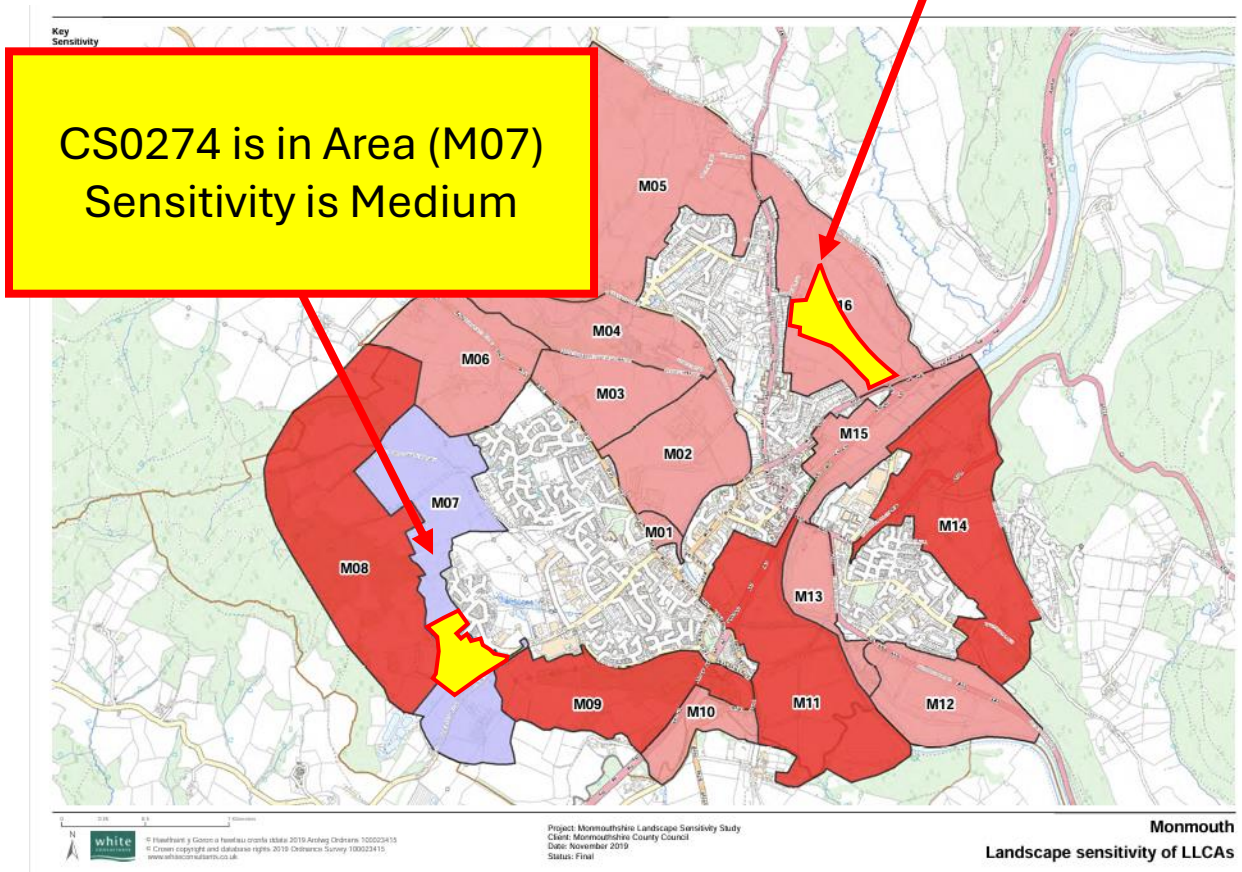
12. Landscape Sensitivity

Monmouthshire Council's Landscape Sensitivity report recommends

- "The area which has the most opportunity is west of recent expansion at Wonastow (M07)"
- Natural resources Wales state "Landscape Sensitivity Assessments are used in spatial planning to help guide development or land management changes to less sensitive landscape locations".
- Why has Monmouthshire County Council not followed the recommendations of its own report?

CS0270 Site Landscape Sensitivity is High/ Medium

CS0274 is in Area (M07) Sensitivity is Medium



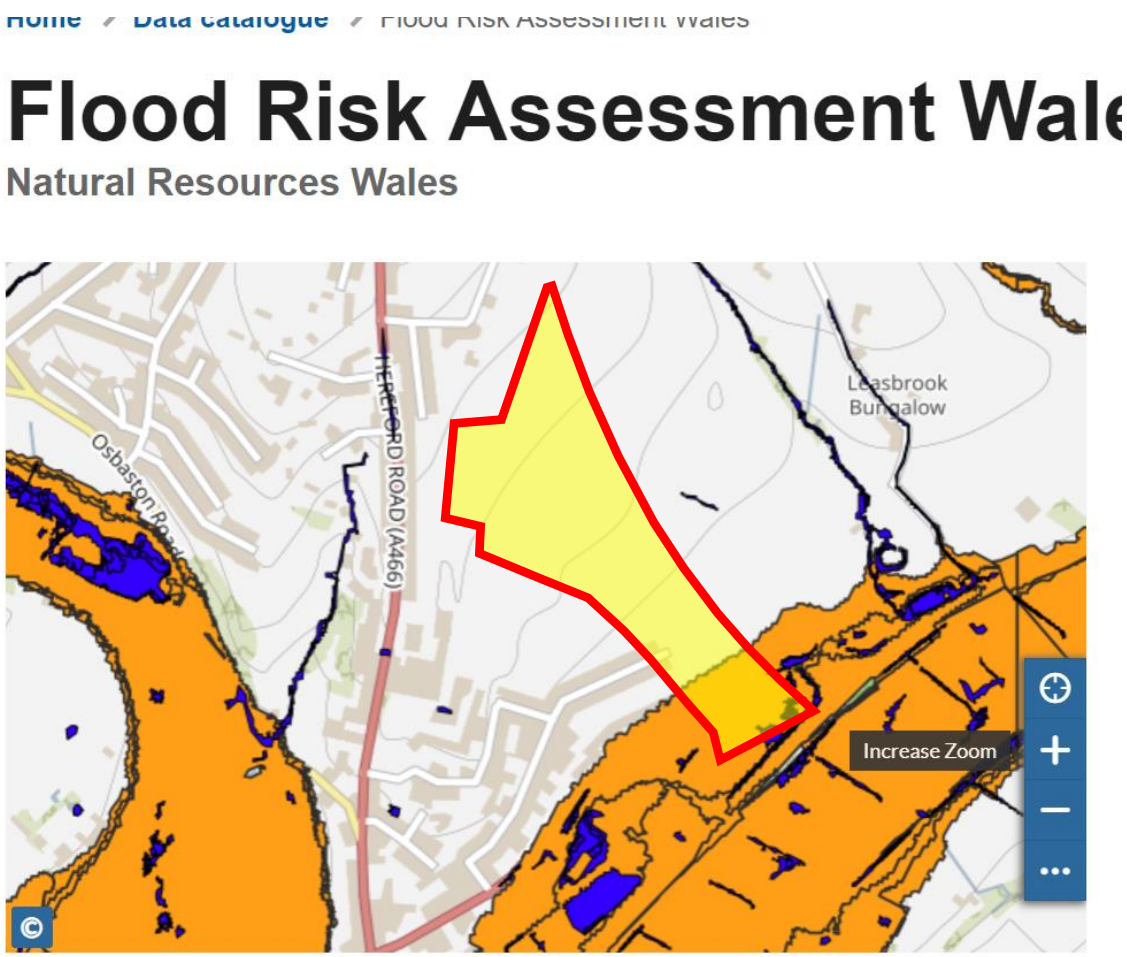
[Source: Monmouthshire LLCAs]

[Sources : Monmouthshire Landscape Sensitivity Update Study (White Consultants)]
[Natural Resources NRW Landscape Sensitivity Website Page]

13. Flooding to Site Entrance

- Flooding. Road entrance to the site is in a flood zone and regularly floods. The last time was Feb 2024. This could cause problems for emergency vehicles getting to the site.
- The developer has proposed to put the SuDS in the flood zone.

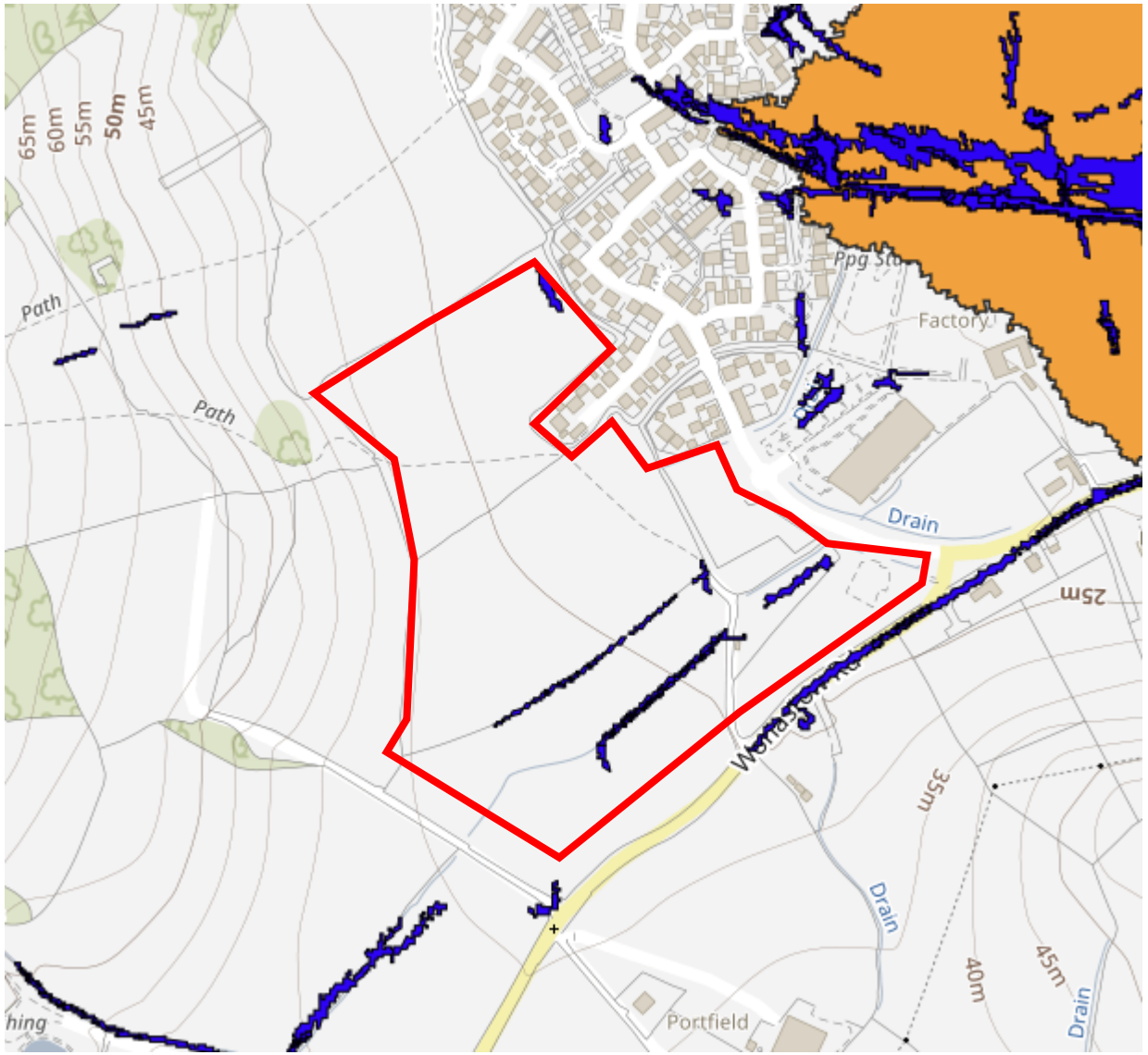
Resident Photo taken Feb 2024 about 24 hours after heavy rain
Note the red clay colour of the runoff water



[Source: https://datamap.gov.wales/layergroups/inspire-nrw:FloodRiskAssessmentWales]

Flooding could cause problems for Emergency Services getting to the site

The Wonastow Road site has less flooding issues



[Source: https://datamap.gov.wales/layergroups/inspire-nrw:FloodRiskAssessmentWales]

Predominantly Zone 1. Small amount of Zone 2/3 Surface Water Flooding within site.

"While further assessment needs to be undertaken on Surface Water Flooding the amount on site is minimal and likely to be overcome. "

[Source: Monmouthshire Replacement Local Development Plan Candidate Sites High-Level Assessment as amended (July 2023)]

Other Objections

- Is the 50% affordable housing realistic?
- School Places for Primary schools
- Road Safety on Dixton Road/ Dixton Close
- Medical Capacity for Doctors and Dentists
- Lack of a railway station in Monmouth
- Wye Valley National Landscape Dark Skies and Artificial Light Pollution
- Playgrounds for Children
- Lack of Accessible Design
- Limited Job Opportunities
- Environmental Impact of Construction
- Public Opposition
- Concerns about Future Expansion

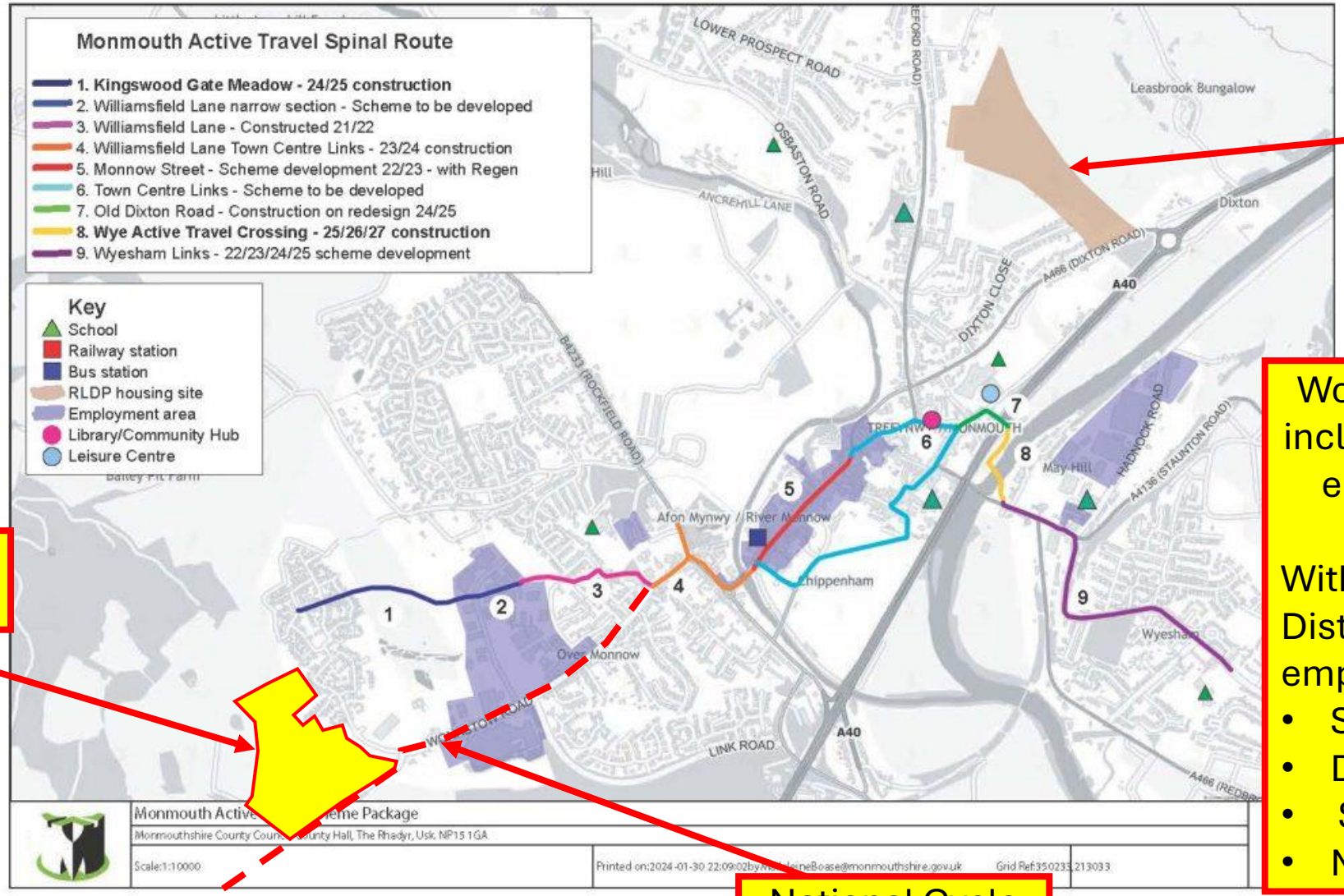
The Wonastow Road site is a mixed use site for 175 houses

Within easy walking distance of major employers

- Siltbusters
- Triwall
- Singleton Court
- Mandarin Stone

Traffic is further away from major pinch points and can distribute in different directions through the Link Road

The Wonastow Road Site is better served by Active Travel



Dixton Road site is 2km away from nearest cycle route

Wonastow Road site includes 2 hectares of employment land

Within easy Walking Distance of major employers

- Singleton Court,
- DS Smith Triwall
- Siltbusters
- Mandarin Stone

CS0274

National Cycle Route 423

CS0274 (Wonastow Road) is a More Suitable Site

Site Number	CS0270	CS0274
Site Name	Dixton Road/ Leasbrook	Land at Wonastow Road
Number of Houses	270	175
Social Housing Provision	50%	50%
Employment Land	No	2 hectares
Near an Active Travel Route	Nearest Cycle Lane 2km away	National Cycle Route 423 passes the site. Active Travel routes planned.
Upstream of Drinking Water Supply	Yes	No
In area failing SAC Phosphate Targets	Yes	No
Prime Agricultural Land	Grade 2 (80%)	Grade 3a (60%)
Bats - site in 3km Core Sustenance Zone	Yes - within 1Km of rare bat roost	No
In Landscape Setting of AONB	Yes Within 250 metres of Wye Valley AONB	No
Setting of Scheduled Monument	Yes within 180 metres of Dixton Mound	No
Flooding - In Zone 2 and 3	Around 15%	Around 5%
Traffic Congestion to Trunk Roads	High - with 100 metres of major pinch point - Dixton Roundabout	Medium
LANDMAP Landscape Sensitivity	High/Medium	Medium

Monmouth is the Jewel in its Surrounding Countryside - let’s keep it that way

Monmouthshire County Council Replacement Local Development Plan (RLDP)

Objections for Site HA4 (CS0270) Land on Dixton Road, Monmouth from [redacted]

[redacted] I am sending in my response by email, and hand delivery to County Hall.

[Please note that I would like to present key findings to the Planning Inspector when the RLPD is being scrutinised]

[Please also read this report alongside the Presentation Report (Version 1.7) that provides images and charts that accompany this response.]

[redacted] – a profession where precision matters and one where following laws, rules and regulations is critical. [redacted]

[redacted] He has done this through attention to detail, thorough research and interviewing key people in the industry.

The research in this document is the result of carefully reading of Planning Policy Wales, Technical Advice Notes, UK and Welsh Government Acts, Case Law (such as the Sweetman Ruling), Monmouthshire County Council Replacement Local Development Plans, Habitat Regulations Assessment (HRA), Integrated Sustainability Appraisal (ISA) the Infrastructure Plance, Freedom on Information requests, Environmental Information Requests and many hours of research.

It is also based on correspondence with key organisations such as Cadw, Wye Valley National Landscape, Welsh Water and the Drinking Water Inspectorate.

I am not against developing housing in Monmouth. We clearly need more affordable in the town.

I believe that we need the Right Houses, in the Right Location with the Right Infrastructure.

I do not believe that the site HA4 Dixton Road, Monmouth is the right site for housing in Monmouth. There is an alternative site CS0274 Land at Wonastow Road, Monmouth, that more suitable and less environmentally sensitive.

Candidate Sites

In September 2023 Monmouthshire County Council proposed 3 candidate sites for Monmouth.

I think that they have selected the wrong site.

The sites were HA4/CS0270 Dixton Road, CS0271 Vauxhall Fields and CS0274 Wonastow Road. They selected the HA4 Dixton Road site, a particularly sensitive site – for the sole reason that it is a bigger plot. They overlooked the CS0274 Wonastow Road site, that is a less sensitive site.

[Refer to Report Page 2]

[redacted] from the Integrated Sustainability Appraisal (ISA) which when average placed the Wonastow Road site as the highest rank and the Dixton Road site as the lowest rank.

The Dixton Road site is a large site. It is the Size of 20 football pitches. It will hold 270 Houses, 405 Cars, 618 Residents, 266 dogs and 232 cats.

Don't forget that in addition to the 270 houses on the Dixton site, there are 220 other houses for Monmouth – 110 at Drewen Farm, 60 on the Rockfield Road and 50 at Tudor Road Wyesham.

[Refer to Report Page 3]

1. Test of Soundness

I believe that the RLDP fails the test of soundness for the following reasons

1.1 Lack of clarity around site names

Throughout the RLDP process the developer and Monmouthshire County Council have used a range of site names for the location of the site.

For clarity it should be called "Land at Dixton Road, Monmouth". The main site entry is on Dixton Road, and the Dixton Road runs along the site boundary for over 100 metres.

Monmouthshire County Council frequently refer to the site as Leasbrook, a small cluster of around 10 houses, a location that is not known to some Monmouth Residents. The site is over 300 metres from Leasbrook.

It has been called in the RLDP as

- Land at Leasbrook (RDLP 2024) - The site is some 300 metres from a small cluster of houses outside of Monmouth called Leasbrook. Many Monmouth residents do not
- CS0274 - Leasbrook (Land north of Dixton Road) – (Candidate Site Register Sept 2023).
- CS0274, Land at Dixton Road (Presentation to Scrutiny Committee Sept 2023)
- Land north-east of Monmouth (ISA).
- Land To The East Of Monmouth (Planning application for an EIA Screening DM2024/01250)

In contrast the site CS0274 Land at Wonastow Road consistently uses the same name.

While there may be good historical reasons for calling it Leasbrook, I believe that this only adds to the public confusion about the site.

Could one of the reasons why the Leasbrook name continues to be used is that Monmouthshire County Council are keen to conceal the location of the site?

1.2. Public Consultation at Times that Discourage Responses

Preferred Strategy for the last public consultation and engagement for the RLDP Preferred Strategy ran from 5th December 2022 to 30th January 2023.

https://www.monmouthshire.gov.uk/2022/12/council-proposes-new-growth-strategy-for-monmouthshire/

The timing around Christmas was probably at the worse time for most residents. This is a time when people's thoughts turn to Christmas shopping, carol concerts and Christmas parties – not responding to an RLDP Consultation.

This consultation included no new site allocations for Monmouth, so it was difficult for Monmouth residents to make an objection

The current RLDP consultation runs 4th November to 16th December 2024.

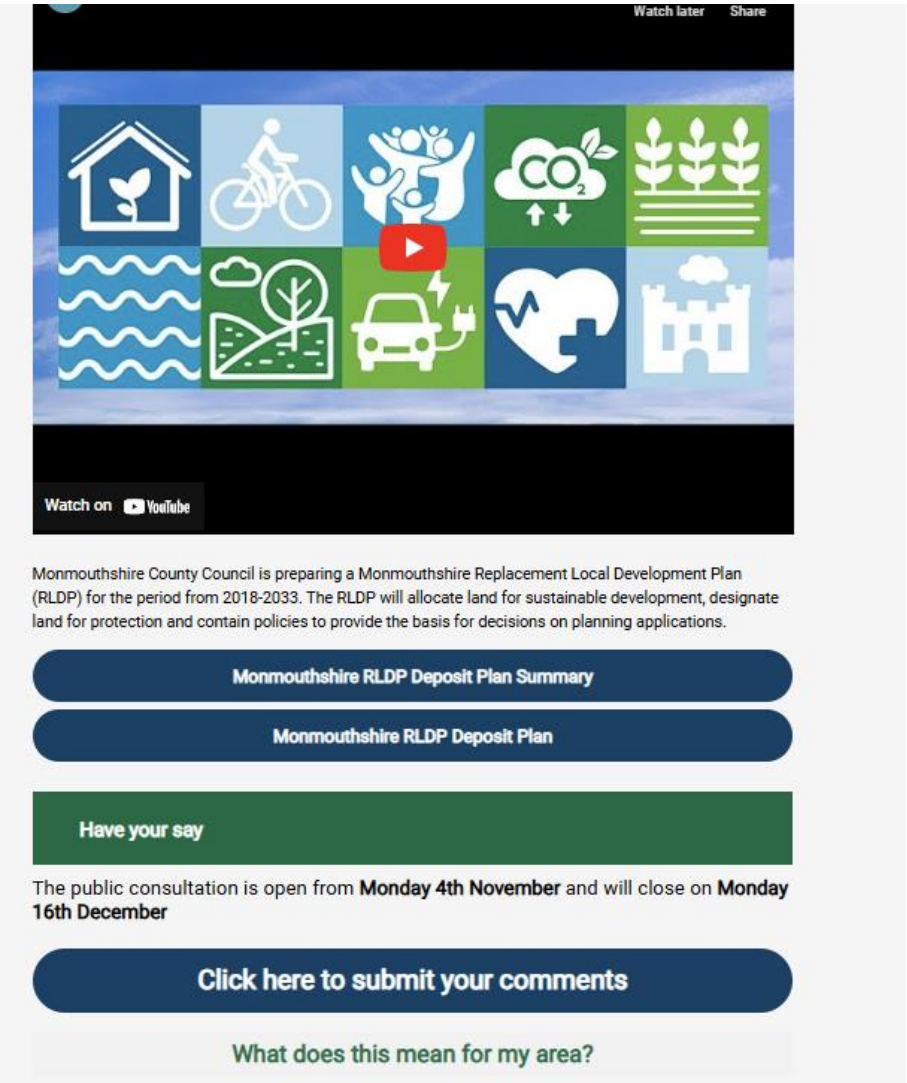
Again, not great timing – as it again comes in the busy run up to Christmas.

1.3 Consultations Response Form Limits Public Responses

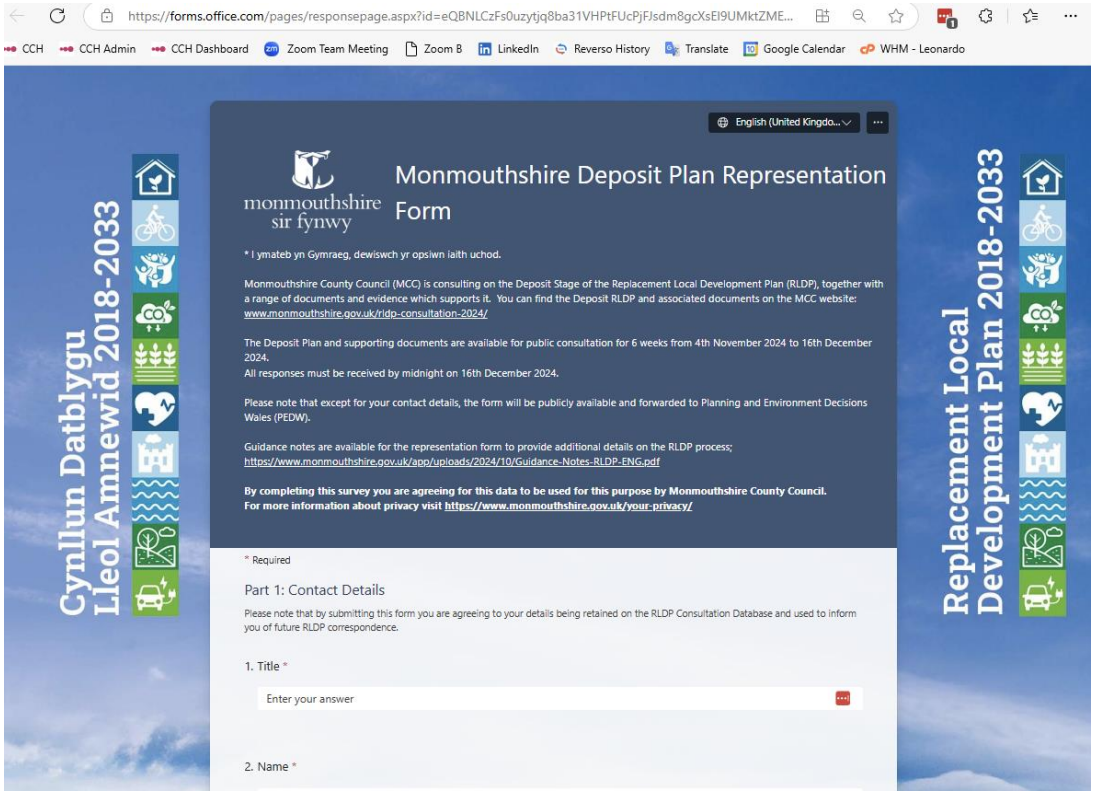
Monmouthshire County Council has made it difficult and overly complicated for the public to respond.

Rather than the option to send in an email or a letter you are greeted by a complex web form that does not allow you to proceed until you have fed in every answer.

So when you land on the RLDP home page, you are given only one option to respond.



After clicking on the **"Click here to submit your comments"** it then demands contact details.



It then leads to a number of questions such as

"Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?"

Then

"Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?"

You cannot go on unless you say yes or no

[In earlier versions of the consultation the Options were not Yes/No It was do you Approve or Object – There was no option for No Opinion]

Submit followed by

"10. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)"

[Words such as "Spatial Strategy" are planning jargon that may not be understood by people of a [redacted]

Submit followed by

"11. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)"

[As a member of the public, I would struggle to understand what a “Managing Settlement Form policy” is]

Submit followed by

12. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

Submit followed by

13. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

Submit followed by

14. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

Submit followed by

[Please note that all of these questions have to be answered by as Yes or a No response]

Submit followed by

15. Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

Submit followed by

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

Submit followed by

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

Submit followed by

17. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

[Note – This is the stage where citizens have the opportunity to comment on a development close to their home. Do you not find this buried? Do you not find that this may discourage responses.]

Submit followed by

18. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Submit followed by

19. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

Submit followed by

20. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

Submit followed by

21. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

Submit followed by

22. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

Submit followed by

23. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

Submit followed by

24. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

Submit followed by

25. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

Submit followed by

26. Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

Submit followed by

27. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

28.Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

Submit followed by

Appearance at Examination Hearing Sessions

Submit followed by

29 . If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

Submit followed by

30. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

31. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Submit followed by

32. What age group do you fall within?

33. Where do you live? Please state the nearest town or village?

34. Nationality

35. What gender do you identify as?

36. What is your sexual orientation?

37. What is your ethnicity?

38. What is your religion or belief?

39. Disability is defined by the Equality Act 2010

40. Do you having caring responsibilities. If yes, tick all that apply

Submit and end

Web form discourages responses

I believe that this is overly complicated and would have stopped some residents from responding. It would also have discriminated against residents who may have a learning impairment, so breaching key discrimination laws.

1.4 No Version of the online RLDP Form Provided in the Welsh Language

There was also no version of the web form easily provided in the Welsh Language.

If you click on "**Cliciwch yma i gyflwyno eich sylwadau**" it takes you to web page that is only in English.

As we have seen before this page is confusing enough in the English Language and must be discriminatory for a native Welsh Speaker.

Mae Cyngor Sir Fynwy yn paratoi Cynllun Datblygu Lleol Newydd (CDLlN) ar gyfer y cyfnod rhwng 2018 a 2033. Bydd y CDLlN yn dyrannu tir ar gyfer datblygu cynaliadwy, yn dynodi tir i'w amddiffyn ac yn cynnwys polisïau i ddarparu sail ar gyfer penderfyniadau ar geisiadau cynllunio.

Crynodeb Cynllun Adnau CDLlN Sir Fynwy

Cynllun Adnau CDLlN Sir Fynwy

Beth mae hyn yn ei olygu i fy ardal i?

Dweud eich Dweud

Mae'r ymgynghoriad cyhoeddus ar agor o **Ddydd Llun 4ydd Tachwedd** a bydd yn cau ar **Ddydd Llun 16eg Rhagfyr**.

Cliciwch yma i gyflwyno eich sylwadau

Digwyddiadau ymgysylltu

[source Ymgynghoriad ar Gynllun Datblygu Lleol Newydd (CDLlN) 2024 - Monmouthshire]

1.5 The alternative ways of responding were simpler and not highlighted

The law says that it is possible to respond to the RLDP by sending a postal response to Monmouthshire County Council in Usk. This is not mentioned on the home page.

Another much easier way of responding was to send a message to planningpolicy@monmouthshire.gov.uk

1.6 Consultees found the Web Form Overly Complicated

It was not just residents that found the web response form complicated.

I was also in contact with the Gwent Wildlife Trust about concerns for the Greater Horseshoe Bats in Monmouth.

They wanted to send in a response but found the web form overly difficult. The representative emailed me to say.

“Have been looking at the Website for submission of our objection, it seems incredibly complicated with 49 questions to answer. I fear it may put people off responding. I was hoping to just submit a Letter pdf.”

Summary: Monmouthshire County Council has made it difficult for the public to comment on the RLDP which is un-democratic.

1.6 Is the RLDP consultation still Valid?

I do have to ask the question if the current RLDP Consultation is still valid for the following reasons

1. There was no preferred site consultation for the residents of Monmouth (Dec 2022 – Jan 2023) as there was a phosphate ban.
2. Confusion over site names e.g. Leasbrook vs Dixton Road
3. Timing consultations at busy periods
4. An overly complicated response form, with no clear alternative options

1.7 The Sweetman Ruling

The main area though on the test of soundness is the “Sweetman Judgement.”

The selection of site HA4 Dixton Road fails a key piece of Case Law – known as the Sweetman Ruling.

The Sweetman ruling (C-258/11, People Over Wind and Sweetman v. Coillte Teoranta) is a landmark judgment from the European Court of Justice (ECJ) that clarified how mitigation measures should be considered in the assessment process under the EU Habitats Directive.

Key Points of the Ruling:

Habitats Directive: The case centred on Article 6(3) of the EU Habitats Directive, which requires an "appropriate assessment" of any plan or project likely to have significant effects on a Natura 2000 site, in view of the site’s conservation objectives.

Mitigation vs. Screening:

The ECJ ruled that mitigation measures (actions designed to reduce or eliminate potential adverse effects of a project) cannot be considered at the screening stage of the assessment process.

Screening must focus solely on whether a project might have significant effects. If potential impacts are identified, a full appropriate assessment is required.

Precautionary Principle: The judgment reinforced the need for a precautionary approach in environmental protection. Any doubts about potential impacts must lead to a detailed assessment, ensuring that Natura 2000 sites are safeguarded.

Implications: The decision set a strict standard for project developers and authorities, emphasizing that they cannot rely on proposed mitigation measures to bypass detailed assessments.

Site HA4 is within 950 metres of Newton Court Bat Site SSSI and is well within the 3Km Core Sustenance Zone (CSZ) for the endangered (Red List) Greater Horseshoe Bats. At the time of screening, two sites were available for development in Monmouth.

HA4 Dixton Road, Monmouth is within the 3Km Core Sustenance Zone (CSZ) and requires mitigation measures (new tree planning) and artificial lighting schemes. Site CS0274 Wonastow Road, Monmouth, is outside of the 3Km Core Sustenance Zone (CSZ) and requires no mitigation.

According to the Sweetman Ruling site HA4 should have been screened out and replaced by an alternative site CS0274 that requires no mitigation.

Also according to the same ruling there should have been a detailed Habitat regulations Assessment for the HA4 Dixton Road site, ensuring that Natura 2000 sites are safeguarded

2. Objections to the RLDP

Most of the objections I have are in relation to Site HA4 Dixton Road, Monmouth.

I also highlight an alternative site for Monmouth that has been overlooked by Monmouthshire County Council, despite ranking higher in the Integrated Sustainability Appraisal (ISA).

The alternative candidate site is CS0274 Land at Wonastow Road, Monmouth.

2.1 Water Quality

Throughout history there has been a Golden Rule of Water Quality.

This is that you get your drinking water from upstream of where you live.

It is for obvious reasons.

If there is any sewage or runoff pollution, this does not contaminate your water supply.

This has been the case up to now, but will change with the development of site HA4.

The Romans understood it. The mediaeval monks of Monmouth understood it. The Victorians understood it. But we seem to have forgotten it.

The proposed development on site HA4 Dixton Road, Monmouth will allow surface runoff pollution to flow into the River Wye 400 metres upstream of where Monmouth extracts its water supply.

[Refer to Report Page 5]

Monmouth does not get its drinking water from a lovely reservoir up in the mountains.

Monmouth gets its Water Supply from the River Wye. The same polluted River Wye that is failing phosphate targets.

The water source is the tower of green pipes that is opposite Monmouth Rowing Club, approximately 250 metres upstream from the Wye Bride in Monmouth.

Water is pumped a short distance to the Monmouth (Mayhill) Water Treatment Works (that is the building on the Hadnock Road near to Lidl). It is the one that flooded in 2020, and we were handed out bottles of drinking water.

From there, it is pumped up to a small covered reservoir next to the Kymin Road and then gravity fed to Wyesham and on to Monmouth underneath the tarmac of the Wye Bridge.

It is also used to feed Court Farm Water Treatment Works near Ponthir via a 32 kilometre pipeline into a raw water storage reservoir." It is also used to top up the water supplies of Caerleon and Newport, supplying a population of 933,000.

If there is any surface runoff pollution from the HA4 Site, it will flow into the brook network close to Dixton Church and enter the River Wye. 400 metres further on downstream it will enter the inlet for the Monmouth (Mayhill) Water Treatment Works and could contaminate our drinking water.

2.2 Drinking Water Contamination

Monmouth's Water is already under two notices from the Drinking Water Inspectorate

[Refer to Report Pages 6 and 7]

Notice 1 – Runoff Pollution

The first notice was as the result of a runoff pollution incident.

DWI Notice - Monmouth Treatment Works and Court Farm Treatment Works Abstraction Risks Supply System WR 2023 00003 October 2023 [https://www.dwi.gov.uk/water-companies/improvement-programmes/dwr-cymru-welsh-water-improvement-programmes/dwr-2023-00003-v1/]

Very few details of the cause of the notice were available, so I carried out a Freedom of Information Request of the DWI. The response is below.

DWR-2023-00003 Monmouth WTW and Court Farm WTW

"This notice was following a taste and odour event in June 2021, in which 73 consumers reported an unusual taste and/or odour downstream of these two works. The company concluded that the cause was a contamination of hydrocarbons and volatile fatty acids on the River Wye although no conclusive pollution source was identified.

The notice aims to deliver improvements to both water treatment works to increase their capacity of detecting changes in the raw water quality and to treat increase challenges to the treatment process."

[Source: DWI Freedom of Information Request - EIR2024/20420 - 6 November 2024]

More details of the same incident were provided in the DWI Wales Annual Report.

Drinking Water Inspectorate Annual Report for Wales 2021

The report described "a sudden change in river quality resulted in **one of the most significant taste and odour events in Monmouth, Wales for over a decade**".

“In June 2021, Dŵr Cymru Welsh Water reported a taste and odour event in Monmouth and surrounding areas. The company received a total of 73 reports from consumers; 62 from the area supplied by Monmouth treatment works and 11 from the area supplied by Court Farm treatment works. The majority of these were of a taste or odour described as ‘chlorinous’ (51 contacts).

Initially the contacts were from an area supplied by Monmouth (Mayhill) Treatment works, which supplied a population of 18,000 in Monmouth and two days later, the company began to receive contacts from the area supplied by Court Farm treatment works.

Court Farm treatment works supplies a population of 933,000. Monmouth directly abstracts from the River Wye and Court Farm transfers water from the same river (250 metres upstream of the abstraction for Monmouth) via a 32 kilometre pipeline into a raw water storage reservoir”.

“Outcomes such as these are likely to be exacerbated by climate change and resource challenges which consequently increase the risk of, for instance: algae, turbidity, metals, nutrients and pesticide run-off but also emerging contaminants such as polyfluoroalkyl substances, endocrine disrupting compounds and other substances of concern”.

[Source: DWI-Public-Water_Wales-2021-V08-1.pdf]

In a subsequent meeting between Welsh Water and the Place Scrutiny Committee of Monmouthshire County Council n 5 December 2024, Welsh Water said that they had been unable to find the source of the pollution incident.

According to Welsh Water no further pollution incidents have occurred since the 2021 incident

Notice 2 – Cryptosporidium

DWI Notice about Cryptosporidium April 2024 DWR-2023-00011 [https://www.dwi.gov.uk/water-companies/improvement-programmes/dwr-cymru-welsh-water-improvement-programmes/dwr-2023-00011/]

The Drinking Water Inspectorate received a regulation 28(1) report of the Water Supply (Water Quality) Regulations 2018from the Company dated 31 July 2023, which states that there is or has been a significant risk of supplying water from the water treatment works that could constitute a potential danger to human health or could be unwholesome.

It cited cases References C48694 Wye at Monmouth and T54494 Monmouth WTW Final.

“Risk of crypto breakthrough through existing treatment processes into final water. (Potential for elevated levels of Cryptosporidium due to its presence in the raw water). Risk of Insufficient Protozoan (crypto) log reduction and inability to meet Reg 26 based target.”

Cryptosporidium is a microscopic parasite that can cause an unpleasant – and sometimes dangerous – illness called cryptosporidiosis. This nasty bug lives in the intestines of infected humans and animals and is passed out in their poo. It can then spread and contaminate water sources like lakes, rivers, and swimming pools, as well as food like raw milk and vegetables.

The problem for Monmouth is that Cryptosporidium is resistant to chlorine, which is the current way of sterilising water in Monmouth.

The symptoms are deeply unpleasant - severe watery diarrhoea, vomiting, stomach cramps, nausea, fever, and loss of appetite. It can last around 2 weeks, with the illness seeming to

improve and then returning before you properly recover. The only way to know for sure if you have the illness is by getting tested by your doctor.

The Drinking Water Inspector has mandated two upgrades to Monmouth (Mayhill) Welsh Water Treatment Works. These upgrades are not due to be completed until March 2028, and following a period of Monitoring will not be signed off -by the Drinking Water Inspector until March 2030.

[Source: News article – Monmouthshire Beacon]

The situation will be made worse by runoff pollution from the HA4 Dixton Road site – particularly from pet poo from the 266 dogs and 232 cats that would, based on averages, inhabit the site.

With both of these notices, it would be unwise to plan any development of extra houses in Monmouth before these critical upgrades are signed off in 2030.

The Notices both demonstrate that Monmouth's water supply is very susceptible to runoff water pollution.

Building houses at site HA4 Dixton Road, Monmouth upstream of the Water Treatment Works could cause serious problems for public health.

In contrast any runoff pollution from site CS0274 would flow out into the River Wye downstream of Monmouth and downstream of the water inlet and would not impact Monmouth's drinking water quality.

2.3 Surface Runoff Pollution

Site HA4 Dixton Road Will increase the amount of pollutants (particularly Phosphates) entering the River Wye in Monmouth.

Rainwater runoff from the site flows into the brook network, near Dixton Church, and then into the River Wye – 400 metres upstream from where Welsh Water take Monmouth's drinking water.

Surface Runoff Pollution regularly flows into the River Wye

Sources of domestic phosphate pollutants in rainwater runoff

- Weedkillers and pesticides
- Cleaning products
- Cat and dog poo
- Road salt
- Decomposition from compost heaps and fallen leaves.

[Source: Minnesota Stormwater Manual]

2.4 Raising Phosphate Levels in the River Wye

One half of Monmouth is in the River Wye Special Area of Conservation for Phosphates.

This can be seen in the attached report under the heading of

"Compliance Assessment of Welsh River SACs against Phosphorus Targets"

Source: Datamap Wales - https://datamap.gov.wales/layergroups/inspire-nrw:ComplianceAssessmentOfWelshRiverSacsAgainstPhosphorusTargets

[Refer to Map on Page 9 of the Report]

The Dixton site is in the eastern area of Monmouth that is in the Wye Valley Special Area of Conservation for Phosphates. It is failing water targets for Phosphates.

The Phosphate Map of Monmouth is in two zones. It follows the watershed along the Herford Road. On the western side, if rain falls it will flow into the River Monnow. On the other side of the Hereford Road, or in Wyesham, it flows into the River Wye.

When the Welsh Government said due to an upgrade at the sewage works on Redbrook Road, that it is OK for Monmouthshire County Council to consider building in Monmouth. I think that what they meant building in the areas of Monmouth that are not failing Phosphate targets.

The Dixton Road site is in the zone failing phosphate targets.

In contrast the CS0274 Wonastow Road site is not in an area failing phosphates and should have been selected instead.

2.4.1 Phosphate Calculations

We have carried out calculations for Phosphates in surface water runoff for the HA4 Dixton Road site.

We have used the Somerset Phosphate Calculator as it is similar soils to Monmouth. Monmouthshire Council do not have a Phosphate Calculator online. We entered in the number of houses, soil type and use of SuDS.

[Refer to Report Page 10]

Current Phosphate Runoff from Agriculture (Cattle Grazing) - 8Kg of Phosphates

Phosphate Runoff from HA4 (including use of SuDS)

16Kg of Phosphates

Current base line from agriculture (cattle grazing) = 8Kg

Increased Phosphate Runoff entering the River Wye

= 16Kg – 8Kg = 8Kg of Extra Phosphates

Source: Phosphate Budget Calculator (somerset.gov.uk)]

2.5 Upgrade to Welsh Water Waste Treatment Works

The Upgrade to Welsh Water Waste Treatment Works only benefits the River Wye DOWNSTREAM of Monmouth.

[Refer to Report Page 11]

The section of the River Wye flowing through Monmouth will be subject to extra Phosphate from Surface Water Runoff pollution.

The upgraded Waste Water Treatment Works will remove about 90% of Phosphates from Sewage Water, but only in normal operation.

At times of high (or increasingly light) rainfall the Monmouth Redbrook Road, Wyesham) Water Treatment Works will reach saturation and discharge Raw Sewage into the River Wye, a process called Storm Overflow.

This data can be viewed in real time on the Welsh Water website]

[Source : Storm overflow map | Dŵr Cymru Welsh Water

And any improvements in our sewage treatment works at the Redbrook Road (near to the showground) only benefit the River Wye South of Monmouth.

The phosphate runoff from the Dixton Road site will increase phosphate levels in the River Wye at Monmouth.

2.6 Dixton Road Severs do not have capacity for an extra 270 houses

A letter sent to me from Rhys Evans, Development Planning Manager | Developer Services at Dŵr Cymru Welsh Water, dated 4 December 2024, highlighted that there was not enough capacity in the sewage network for the HA4 Dixton Road site.

"Whilst we have not yet submitted our representation on the Deposit LDP, **it is unlikely that sufficient capacity exists within the public sewerage network to accommodate the foul flows from proposed allocation HA4.**

"Accordingly, any applicant applying for planning permission in the future would need to fund a Hydraulic Modelling Assessment (HMA) of the local network to establish what reinforcement works would be required to ensure that the public sewerage network could accommodate the site without causing harm to the environment and existing customers".

"Similarly, a HMA would need to be undertaken of our water supply network to understand the expected demand on the network and to outline what reinforcement works may be required to ensure no detriment to existing customers' water supply. We would seek to control the delivery of these developer funded reinforcement works on both the clean and foul network via the planning process."

Talking with Welsh Water engineers it seems quite possible that the sewer pipe will need to be upgraded. As I understand this pipe runs along either the A466 Dixton Road or the A40 Trunk Road. This would cause more chaos to Monmouth's Traffic, which in 2024 has had to endure Welsh Water replacing water mains, a landslip on the A40 that has brought traffic gridlock, upgrades and resurfacing on the Wye Bride as well as Storts Bert and Darragh.

The sewer upgrade would be expensive.

Sewer upgrade costs could reduce the 50% affordable housing

Replacement of the sewers would also be very costly. Talking to a water engineer outside the Place Scrutiny Committee, I was told that the cost of one mile of sewer would run into "the millions".

The cost of the Hydraulic Modelling Assessment (HMA) and the subsequent costs of the sewer upgrade will have to be paid by the developer, Redrow Homes. This would hit their profit margin.

This would almost certainly be used as an excuse for the developer to come back (once the site has been allocated in the Local Development Plan) and say that the 50% Affordable Housing target cannot be met due to the sewer upgrade costs.

Similar requests following "unexpected costs" have happened with other development schemes in Monmouthshire. A specific example was quoted in one of the council meetings discussing the RLDP. At time of writing, I do not have sufficient time to find the example, but on request I can provide this evidence.

2.7 Storm Overflow of Phosphates will continue

Monmouth (Redbrook Road Wyesham) Water Treatment Work will still pump sewage into the River Wye

At the Place Scrutiny Committee of Monmouthshire Council Meeting (on 5 December 2024), Welsh Water highlighted that for many houses in Monmouth the sewer network collects both rainwater and foul water.

During heavy rainfall the water treatment works in Monmouth (Redbrook Road) collects too much foul water and this then pushed out into the River Wye. This is raw untreated sewage.

The representative from Welsh Water indicated that there is a 6mm screen that removes tampons and other debris from the water, and that the toilet paper naturally disperses.

This is called "storm overflow," but seems to happen in times of even light rain. A councillor asked how often this happens and was shocked to discover that the last time this happened was at 3am that very morning.

Welsh Water provide a Storm Overflow map that shows in real time how often foul water flows out into the River Wye.

https://corporate.dwrcymru.com/en/community/environment/storm-overflow-map]

This foul water contains high levels of urine and faecal matter (poo) and is rich in Phosphates. The upgrades to the Water Treatment Works will only be effective in times of low rainfall. Unfortunately, we live in Wales and out rainfall levels are higher than average for the UK.

Phosphate rich discharges will be made worse by an additional 270 houses being built on site HA4 Dixton Road.

2.8 Sustainable Drainage Solutions (SuDS) are not effective on Phosphates

The developer has proposed a SuDS system to remove pollution. SuDS does not remove much phosphate and does not work well on our impermeable clay soil and steep slopes.

The developer has proposed a Sustainable Drainage Solution – SuDS for short. This is not some fancy technology. In essence it is a pond. A pond with reeds. The idea is that runoff water collects into the ponds, it slowly soaks into the ground and helps the reeds grow – a process called nitrification. You then cut down the reeds and remove them from the site.

SuDS are useful in reducing nitrate pollution but only remove 15 to 24% of phosphates from runoff water. The rest washes off into the River Wye.

2.8.1 SuDS removes only 15% to 24% of Phosphates

There is limited academic research on the Phosphate removal of SuDS, as most studies tend to focus on removals of faecal matter and nitrates.

A Brunel University report looks at the effectiveness of SuDS.

"The phosphate removal is not working as well as the other nutrients, since the average removal is only 15.2%".

“This is in line with what has been registered in the other case studies.”

"The SuDS are working quite well, with the exception of the total phosphate levels that are harder to reduce."

[Source - Monitoring of Sustainable Drainage Systems in the Salmons Brook Catchment]

In a different report, this one written by HR Wallingford Report there is a chart that shows a 24% removal level of Phosphates by SuDS.

[Source: HR Wallingford Report – Benefits and Performance of Sustainable Drainage Systems]

2.9 SuDS does not work well on the Heavy Clay Soil of site HA4

For Sustainable Drainage Solutions (SuDS) to work well they need to be built on free draining soil, not on the heavy clay soil of the Dixton Road site.

According to the **British Geological Survey,** “For infiltration based SuDS to drain effectively, the topsoil and the underlying geology need to be free draining”.

“Sands and gravels, for example, are generally more permeable than silts and clays.”

This is from a section of their SuDS report **“Will the ground accept water?”**
[Source: British Geological Survey https://www.bgs.ac.uk/geology-projects/suds/]

The problem is that the Soil on the HA4 Dixton Road site is heavy clay and is not free draining. The soil is ideal for grazing cows, but not for SuDS.

[Refer to Report Page 13]

It is easy to see the type of soil for each site as there is an online map viewer called Soilscape.

- HA4 Dixton Road Site - Soilscape 8 - Clay Soil with Impeded Drainage
- CS0274 Wonastow Road Site Soilscape 12 - Loamy - Freely Draining Floodplain Soils

This can be best seen on the images in the attached report.

[Source: Landis Soilscapes Viewer - https://www.landis.org.uk/soilscapes/]

The Dixton Road Soil is Impermeable and Not Free Draining. It is not suitable for a pond based SuDS system.

You can see the lack of drainage capacity in the Resident Photo of the attached report taken Feb 2024 after heavy rain. There is a large volume of surface water. Note the red clay colour of the runoff water.

[Refer to Report Page 14]

So, what happens when a SuDS pond is full because it doesn't drain away and it starts raining? It simply overflows.

All of that pollution gets picked up by the rain runs down by the steep slope, and out into the brook network and into the River Wye. Straight into our drinking water.

Site HA4 is not suited to an infiltration based SuDS system.

SuDS Works Better on the Free Draining Soils at CS0274 Wonastow Road.

2.10 SuDS Pond has been situated in a Flood Zone

SuDS is even less effective if placed in a flood zone.

According to a plan from the developer one of the SuDS ponds has been placed in the flood zone. This is the same area that appears on the resident photo taken in Feb 2024.

[Refer to Report – Page 15]

[Source: LEASBROOK, DIXTON ROAD, MONMOUTH - TRANSPORT AND HIGHWAY UPDATE – MARCH 2024 SLR Consulting Limited for Redrow Homes SLR Project No.: 425.000722.00001 8 March 2024 Revision: V4 - Appendix A]

2.11 Traffic Congestion on Traffic Hotspot (Dixton Roundabout)

Dixton Roundabout is a Major Traffic Pinch Point

The entrance to the candidate site (CS0270) is only 100 metres from the congested Dixton Roundabout. This is the intersection of the A40Trunk round and the A466 Dixton Road, an arterial road. This regularly faces heavy congestion, which is well known to motorists driving to Cardiff from the Midlands and the North of England.

Monmouth already has very difficult traffic due to difficult geography

[Refer to Report Page 16]

2.11.1 Increased congestion

270 new houses would mean an increase of 405 vehicles.

[Source: Average of 1.5 Cars her household in Monmouthshire [[OC] Average number of cars per household, England & Wales, Census 2021 : r/dataisbeautiful (reddit.com)]

These extra 405 cars will an extra 362 extra journeys per day along the Dixton Road.

Due to the busy roundabout we regularly have cars queuing to come out of Monmouth. It takes on average 15 seconds per vehicle to leave the Dixton Road to get onto the Dixton Roundabout.

A Simple journey from Monmouth to Wyesham (less than a mile) often takes 20 minutes or more.

And because cars coming out of the site are at the front of the queue, with the merge in turn rule, we calculate that in busy periods it will add up to 5 or 10 minutes to journeys coming out of Monmouth towards Dixton roundabout.

This will hit all of us, but will particularly hit people heading North, people travelling to Wyesham as well as people dropping their kids off at one of the schools.

This is in addition to the 4,490 vehicles per day already travelling on the Dixton Road and the 36,760 vehicles per day driving along the A40.

[Source: Road Traffic statistics for A40 and A466 Department for Transport [Road traffic statistics - Manual count point: 40510 (dft.gov.uk) and Road traffic statistics - Manual count point: 70074 (dft.gov.uk)]

2.11.2 Long distance commuters

Monmouth has limited employment prospects – particularly for better paid jobs, so has a high concentration of commuters who each day leave the county to travel to employment hotspots in Bristol, Newport, Cardiff and Hereford.

[Source: Net out-commute of around 2,800 residents per day -Monmouthshire County Council Our Local Transport Plan 2024 – 2029 Page 21 PowerPoint Presentation (monmouthshire.gov.uk)]

The ISA states "Existing travel patterns in Monmouthshire reflect its rural nature; with a trend of relatively long travel to work distances, high levels of car ownership and reliance on the private car. Specifically, in 2021 52.4% of the resident population of Monmouthshire were travelling to work by car or van, compared to 56.5% in Wales".

Based on the average annual mileage, that would create an additional 476 tonnes of the greenhouse gas CO2 per year, as well as increasing the level of air pollution.

2.11.3 Conflicts with Policy ST1

All of this additional traffic congestion from the HA4 Dixton Road site appears to be against Policies ST1 and ST2.

Policy ST1 - Sustainable Transport Proposals
"Developments that are likely to create significant additional road traffic growth, or adversely affect the safe and efficient operation of the highway system will not be permitted."

2.11.4 Conflicts with Policy ST2

Policy ST2 – Highway Hierarchy also looks like it is breached

The A40T at Dixton Roundabout is a trunk road and a Strategic Route.

The policy states "Proposals that would result in short local journeys on these routes and add to unacceptable congestion will be refused".

Traffic on the site will use the A40T for short journeys.

For example, if you lived at site HA4 and wanted to pick up some dog or cat food from Wye Valley Feeds on the Wonastow Road Industrial Estate, it is quicker to use the A40.

Leaving at 10:00 am and using the A40, the journey is 2.5 miles and according to Google Maps takes 6-8 Minutes, the alternative route of driving through the town centre is 1.7 miles and takes 8-10 minutes.

The A466 (Dixton Road) is an arterial route.

The policy states “On arterial routes proposals for on street parking, new frontage access and turning movements will be considered against the interests of road safety and the efficient movement of traffic”.

The development would need both new frontage access and turning movements.

2.11.5 ISA Concerns

The ISA highlights (Page 70). “Housing and employment growth could have the potential to increase traffic, especially on key roads into and out of Monmouth in particular”

The ISA also highlights problems with traffic at Ha4 Dixton Road “Option I [Dixton Road] is worst performing of the Options given its location between two A roads which currently experience high levels of traffic and congestion at peak times.”

2.11.6 Lack of Traffic Assessment

There does not appear to have been a detailed traffic assessment carried out.

The lack of a traffic assessment appears to be backed up by Monmouthshire Council’s Highways Development Control.

In response to an application, DM/2024/01250 (EIA Screening Request) Highway Engineer, Mark Davies wrote in December 2024.

“The proposal will have an impact/effect on the immediate local highway network, particularly the A466 Dixton Road and A466 Dixton Road / A40 Dixton Roundabout (trunk) a detailed and robust transport assessment will be required to support an application.

The application will also affect existing active travel and sustainable transport provision.”

2.12 Air Pollution

Adding 405 extra cars close to the Dixton Roundabout will also increase air pollution.

How much by? We don’t know as the county council is currently not monitoring PM 2.5 in Monmouth, let alone on Dixton Road. If you don’t know what it is now, how can you know how much it will increase by?

Why does the Council not Monitor the more dangerous PM2.5 and PM10 particulate levels, particularly given the proximity of the Dixton Road development to Monmouth Comprehensive School?

Monmouthshire County Council only monitor NO2 levels. The nearest monitoring station MM13 Pike House, Dixton Road recorded average levels for 2022 of 24.4 µg/m3 (far in excess of the WHO guidelines of 10 µg/m3). PM2.5 and PM10 particles are more dangerous and low levels of exposure can cause health problems.

A private PM2.5 Monitoring Station in Drybridge Street. Situated some distance from the A40/ A466 regularly shows PM2.5 levels higher than WHO Guidelines.

[Refer to Report Page 17]

[Source: Monmouth Air Quality Index (AQI) and United Kingdom Air Pollution | IQAir]

I think that it would be sensible to have a 24-month monitoring programme for PM2.5 and PM 10 at the Dixton Roundabout, followed by detailed projection of increased levels before any site gets any go ahead.

For more details on Air Pollution I refer you to the excellent RLDP Consultation submission written by Frank Brehany. He kindly emailed me a copy of his submission.

2.13 Residents from the Dixton Road Site Will Rely on the Car as Active Travel is Difficult

- The Dixton Road site is 2km from the town centre and nearest shop
- The site is up a steep slope
- Nearest cycle path is more than 2km away
- Cycling involves using the A466 Dixton Road – a major arterial road with over 4,400 vehicles using the route every day

Residents from the Dixton Site will rely on their cars as Active Travel is difficult. The nearest cycle route is 2 km away. Cycling along Dixton Road involves sharing the road with 4,400 vehicles a day.

Here is a picture of the site entrance. Would you enjoy cycling along that?

[Refer to report Page 18 - Resident Photo showing typical traffic at the Dixton Road Site entrance]

In contrast the CS0274 Wonastow Road site is well served by existing and future cycle routes. It has a National Cycle route going past the front of the site. I cycled along it last week.

- There is a National Cycle Route (426) running past the site
- It is part of the Active Travel network that is either in place or being built that serves the south of Monmouth. This network separates cyclists and pedestrians from the road network

2.14 Loss of habitat for Endangered Greater Horseshoe Bats

2.14.1 Newton Court SSSI – Home to Greater and Lesser Horseshoe Bats

Newton Court – less than 950 metres from the Dixton Road site is home to Monmouth's Endangered Greater Horseshoe Bats. These bats are on the red list for extinction.

Newton Court is a Site of Special Scientific Interest, part of the Wye Valley and Forest of Dean Bat Site Special Area of Conservation. It is a European Natura 2000 site, and should be heavily protected by law.

This site is home to the Endangered (Red List) Greater Horseshoe Bats and the Endangered (Red List) Lesser Horseshoe Bats.

It is only one of three sites in Wales and the only one in Monmouthshire. These bats delight the residents of Monmouth at dusk – particularly along the Hereford Road adjacent to the HA4 site. In summer they are there most nights.

Building housing will

- Remove 20 football pitches of grazing land
- Rip out established hedges
- Add artificial light
- Interrupt Bat Commuting Lines

How could this possibly benefit the bats?

The HA4 Dixton Road site is within the 3Km Core Sustenance Zone for the Endangered Greater Horseshoe Bats as specified in the Council's Habitat Regulations Assessment. In contrast the CS0274 Wonastow Road site is outside of this zone.

Greater Horseshoe Bats rely on dung insects and hedgerows. Removing this habitat will harm their environment.

Monmouthshire Council has a legal obligation to protect biodiversity.

Redrow Homes have supplied Monmouthshire Council with a flawed ecological report written by a consultancy, saying that it will cause little harm to the bats.

They put in 5 sensors in the surrounding fields close to Newton Court and one in the corner of the development site. So, they were able to say that there was limited bat activity on the site.

The developer has also applied not to do an Environmental Impact Assessment. There is a consultation going on currently. I raised but have been told it is a private, not a public consultation and that any public comments will be ignored.

2.14.2 Site HA4 is within the Core Sustenance Zone of 3km for Greater Horseshoe Bats

The **3km Core Sustenance Zone (CSZ)** is a critical area around a roost where Greater Horseshoe Bats forage and find food to survive. These bats rely on habitats within this zone for feeding, commuting, and roosting. Key features include:

- **Foraging Habitat:** Grazing land, woodland edges, and hedgerows that provide insects like dung beetles and moths, essential for the bats' diet.
- **Commuting Routes:** Linear features like hedgerows, tree lines, and dark corridors that allow bats to travel safely between their roosts and feeding areas.
- **Light Sensitivity:** Bats avoid brightly lit areas, as artificial light disrupts their natural behaviour and reduces usable habitat.

The Dixton Road development site lies within this 3km zone, risking habitat loss, light pollution, and severing commuting routes, which could impact the survival of this protected species.

The HA4 Dixton Road site is only 950 metres away from Newton Court SSSI.

[Refer to Report Page 20]

The Bat Conservation Trust have produced guidance for Planning Authorities and other Partners entitled Bat Species Core Sustenance Zones and Habitats for Biodiversity Net Gain.

“A core sustenance zone (CSZ), as applied to bats, refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost. “

“Primary habitats are those the species rely on most. They need to be available within the CSZ in increased quantities and (where currently poor quality) improved condition to achieve net gain”.

Greater Horseshoe Bat - Primary habitats/features

“The greater horseshoe bat forages in edge habitats with broadleaved woodland important. The species is highly dependent on pasture sympathetically grazed by livestock, particularly cattle to support dung fauna (Ransome, 1996)”.

It is quite clear that Greater Horseshoe Bats rely on cattle grazing.

Removing 12 hectares of grazing land as well as ripping out established hedgerows would mean that the primary habitats are reduced, not increased.

2.14.3 The 1Km Juvenile Sustenance Zone is Not Valid

The developer highlights that the site is outside the 1Km Juvenile Sustenance Zone for the Greater Horseshoe Bats. This is not valid.

The 1Km Juvenile Sustenance Zone is used by developers to argue that the Sustenance Zone should be just 1Km.

This developer provided concept has also made it into the Habitat Regulations Assessment (HRA) under the section for HA4 Dixton Road.

The Bat Conservation Trust reviewed all of the academic literature and concluded that the correct size of the Core Sustenance Zone is 3Km.

It makes no differentiation between adults, lactating females or juveniles.

The Core Sustenance Zone is 3Km.

2.14.4 The 1KM Juvenile Zone Should Not be Included in the HRA

On Page 126 Covering Policy HA4 – Land at Leasbrook, Monmouth under the section “Green Infrastructure, Landscape and Nature Recovery”

“The proposal must be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors minimised, with particular regard to the Greater Horseshoe Bat **Juvenile Sustenance Zone** and corridors used by bats.”

“A S.106 agreement must be signed and include the requirement for additional woodland buffer planting with well-designed public access to be provided on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat **Juvenile Sustenance Zone** and the wider landscape character due to the site’s proximity to the Dixton Conservation Area and Lower Wye Valley Landscape of Historic Interest. This is required in addition to any on-site GI provision”.

In contrast the 3Km Core Sustenance Zone for the Greater Horseshoe Bats is not mentioned at all in HRA Policy HA4 – Land at Leasbrook, Monmouth.

All wording of a 1Km Juvenile Sustenance Zone should be removed from the HRA.

2.14.3 Loss of Functionally Linked Land will harm Bat Foraging and Feeding

Greater Horseshoe Bats rely on Grazing Land (Dung Insects) and Hedgerows.

If you have ever walked past a cow pat on a hot sunny day, you will realise how much insect life it can support.

Removing grazing land and ripping out hedgerows will impact on the levels of food for these endangered bats.

"Juvenile Greater horseshoe bats forage on dung beetles extensively, so factors affecting quality of dung such as cattle numbers and use of pesticides can also impact on populations. Unimproved pasture and woodland are important habitats for sustaining dung beetle, chafer and large moth populations. Linear landscape features such as hedgerows are also important. A landscape of permanent pasture and ancient woodland, linked with an abundance of tall bushy hedges, is the ideal habitat as it provides both their insect food and the linear features used as flight paths. "

"The effective conservation of the Greater horseshoe bat depends on the sensitive management of the farmed and forested landscape around maternity roosts and other sites used by the bats. Cumulatively, changes in agricultural management including: abandonment of grazing land; use of pesticides; hedgerow removal; can impact both horseshoe bat species". [Source Site Improvement Plan: Wye Valley and Forest of Dean Bat Sites - SIP267 (naturalengland.org.uk)]

[Source : Core Sustenance Zones and habitats of importance for designing Biodiversity Net Gain for bats – Bat Conservation Trust]

Monmouthshire Council has a legal obligation to protect biodiversity

The Environment (Wales) Act 2016

"Public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so promote the resilience of ecosystems"

"Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to seek to maintain and enhance biodiversity where it is within the proper exercise of their functions. In doing so, public authorities must seek to promote the resilience of ecosystems. This means that Monmouthshire County Council must take a pro-active approach to improve and not reduce biodiversity when carrying out its functions."

[Source: Monmouthshire Local Nature Recovery Action Plan]

2.14.3 Sweetman Ruling

The selection of site HA4 fails a key piece of Case Law – known as the Sweetman Ruling.

This is particularly in connection with the loss of functionally linked land for the Greater and Lesser Horseshoe Bats at the Natura 200 (European) site at Newton Court SSSI.

The Sweetman ruling (C-258/11, People Over Wind and Sweetman v. Coillte Teoranta) is a landmark judgment from the European Court of Justice (ECJ) that clarified how mitigation measures should be considered in the assessment process under the EU Habitats Directive.

Key Points of the Ruling:

Habitats Directive: The case centred on Article 6(3) of the EU Habitats Directive, which requires an "appropriate assessment" of any plan or project likely to have significant effects on a Natura 2000 site, in view of the site's conservation objectives.

Mitigation vs. Screening:

The ECJ ruled that mitigation measures (actions designed to reduce or eliminate potential adverse effects of a project) cannot be considered at the screening stage of the assessment process.

Screening must focus solely on whether a project might have significant effects. If potential impacts are identified, a full appropriate assessment is required.

Precautionary Principle: The judgment reinforced the need for a precautionary approach in environmental protection. Any doubts about potential impacts must lead to a detailed assessment, ensuring that Natura 2000 sites are safeguarded.

Implications: The decision set a strict standard for project developers and authorities, emphasizing that they cannot rely on proposed mitigation measures to bypass detailed assessments.

Site HA4 is within 950 metres of Newton Court Bat Site SSSI and is well within the 3Km Core Sustenance Zone (CSZ) for the endangered (Red List) Greater Horseshoe Bats. At the time of screening, two sites were available for development in Monmouth.

- HA4 Dixton Road, Monmouth is within the 3Km Core Sustenance Zone (CSZ) and requires mitigation measures (new tree planning) and artificial lighting schemes.
- Site CS0274 Wonastow Road, Monmouth, is outside of the 3Km Core Sustenance Zone (CSZ) and requires no mitigation.

According to the Sweetman Ruling site HA4 should have been screened out and replaced by site CS0274.

2.14.1 Diluted Protection for Bats in the Habitat Regulations Assessment (HRA)

Monmouthshire County Council Habitat Regulations Assessment (HRA) for the RLDP Deposit Plan has diluted protection for Monmouth's rare bats.

1. Dilution of Protection for the Greater Horseshoe Bats

In the HRA (page 66) the consultants proposed wording to protect the Greater Horseshoe Bats, requiring "a suite of bat surveys (e.g. bat activity surveys, roost emergence surveys) to be undertaken between April and September".

The consultants proposed "To meet the requirements of the Habitats Directive regarding allocated greenfield sites within the Core Sustenance Zones (CSZs) of the Usk Bat Sites SAC and the Wye Valley and Forest of Dean Bat Sites SAC, the applicant is required to provide

evidence that the development will not result in adverse effects on site integrity. To achieve this, a habitat assessment will have to be undertaken by a suitably qualified professional. **Where habitats are suitable, a suite of bat surveys (e.g. bat activity surveys, roost emergence surveys) will need to be undertaken between April and September.** Where a land parcel is demonstrably used by SAC bats, mitigation and avoidance measures might be required, and the planning application will likely need to be assessed through a project-level Habitats Regulations Assessment and will need to consider matters such as habitat connectivity, foraging value and minimised lighting'

Monmouthshire County Council have chosen to dilute this protection describing it as "too prescriptive" and removing wording that would require "the need for bat surveys, survey seasons and the potential need for mitigation".

Monmouthshire County Council's response was.

"With regard to this recommendation **Monmouthshire Council expressed concern as to whether the extent of the suggested wording is needed as it is too prescriptive**. Instead, the Deposit Plan addresses these recommendations by providing less prescriptive form of wording in Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species with specific reference to Functionally Linked Land in paragraph 11.10.5, **but without providing specific details of the need for bat surveys, survey seasons and the potential need for mitigation**".

Here is a link to the HRA - Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan

2. HA4 Dixton Road site is within the 3Km Core Sustenance Zone for Greater Horseshoe Bats

On Page 126 of the HRA (Policy HA4 – Land at Leasbrook, Monmouth), the HRA does not mention that this site is well within the Corse Sustenance Zone of 3Km for The Greater Horseshoe Bats. In fact, the site is only 950 metres from the Newton Court SSSI.

The HRA talks only about a "Greater Horseshoe Bat Juvenile Sustenance Zone" in relation to site HA4. In other documents this is defined as a 1Km zone.

The Bat Conservation Trust in their guidance do not differentiate between adult and juvenile bats. They instead, based on a thorough literature review, have recommended a 3Km Core Sustenance Zone for the Greater Horseshoe Bats.

There is another development site CS0274 (Land at Wonastow Road) that is outside of the 3Km Core Sustenance Zone and would little problems to the bats.

3. The site should have been screened out in the screening stage as it uses mitigation measures

I have read the rules that apply to HRAs and in particular to European sites like Newton Court SSSI. This applies to both England and Wales.

Habitats regulations assessments: protecting a European site - GOV.UK

The rules say "At this stage, you should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site".

I think that this came as a result of the People vs Wind (Sweetman) Ruling, that said you cannot use mitigation measures for site selection. This is covered earlier in this document.

I believe that site HA4 Dixton Road should have been filtered out as part of the screening process, as it uses mitigation measures such as lighting schemes. The alternative site CS0274 (Land at Wonastow Road) should have been chosen instead.

4. Assess the likely significant effect

The rules also say "A proposal, alone or in combination with other proposals, could cause a significant effect on a European site if there's:

a reduction in the amount or quality of designated habitats or the habitats that support designated species".

I believe that the removing grazing land within the Core Sustenance Zone for the bats, as well as ripping out established hedgerows, adding artificial light and interrupting commuting lines would lead to a reduction in the amount or quality of designated habitats. As a result, this would qualify as a "likely significant effect"

2.15 Site is Within the "Landscape Setting" of the Wye Valley Natural Landscape (AONB)

Site HA4 Dixton Road is within the "Landscape Setting" and clearly visible from the Wye Valley Natural Landscape (AONB). In fact it is less than 250 metres from the National Landscape.

[Refer to Report – Pages 24 to 27]

A "Setting" is an area outside of an AONB (a buffer zone) that impacts the AONB.

Planning Policy Wales Says "Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas."

"National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the highest status of protection from inappropriate developments."

"Major developments should not take place in National Parks or AONBs except in exceptional circumstances."

[Source : Planning Policy Wales Edition 12 – sections 3.3.5 to 6.3.10]

2.15.1 Example of an AONB Setting - Chilterns AONB

The Chilterns AONB, located in South-East England, has seen a lot of development pressures.

As such they have included a section on Landscape Settings in their Management Plan to provide clear guidance.

"A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB applies when a proposal

affects land in the AONB, regardless of where that effect originates (inside or outside the AONB)".

"The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary".

"**Large growth proposals even far away can have an impact on the AONB, and so fall within the setting**".

"Adverse impacts are not only visual, a noisy development may impact adversely on the tranquillity of the AONB even if not visible from the AONB."

[Source: 2019-2024_Chilterns_Management_Plan_DEVELOPMENT_compressed.pdf]

They have produced before and after images showing the effect od development on the AONB.

2.15.2 Views of the HA4 Dixton Road site from the Wye Valley National Landscape.

Site HA4 Dixton Road is very visible from the National Landscape AONB.

The site is visible for two main reasons.

- The Wye Valley Natural Landscape is on higher ground. – In particular, key tourist areas such as the Kymin and Navel Temple National Trust Properties, Offa's Dyke Path (which descends the Kymin) and also the Little Doward Hill Fort. The summit of the Kymin is around 310 metres (800 feet) above sea level and the Little Doward is 211 metres above sea level.
- The HA4 site is lower and slopes up. The bottom of the site is around 15 metres above sea level. The top of the site is around 60 metres above sea level.

As such it would be very difficult to screen out the site from the National Landscape.

The developer will probably argue that the site could be screened by a row of trees along the Dixton Road.

It would be difficult to screen the site by using trees.

The problem is that the site rises around 45 metres from the bottom of the site up a slope.

I don't know of many British trees that could grow to this height. As I understand an oak would take 30-100 years to reach 20 metres. A silver birch can reach 15 – 20 metres, but this could take 15 years.

The proposed development of trees along the eastern site would not hide the site from the National Landscape.

2.15.3 Dark Skies and the AONB

The development would also have an impact on the Dark Skies in the National Landscape.

The Wye Valley National Landscape also has a significant proportion of dark skies, some of which are amongst the darkest across the UK.

"Dark skies add to natural beauty, tranquillity and a sense of remoteness of place. Looking up at starry skies or across moonlight landscapes throughout the National Landscape can be a

memorable and magical experience. Dark skies are important for landscape, heritage, wildlife, recreation and enjoyment, tourism, health and well-being."

[Source: Wye Valley National Landscape Position Statement: Dark Skies & Light Pollution]

Adding 270 houses within 250 metres of the Wye Valley National Landscape would almost certainly increase light pollution

2.15.4 Objections from the Wye Valley National Landscape

The Wye Valley National Landscape have raised objections. In response to planning application DM/2024/01250 (an EIA Screening Request) they highlighted the following objections (dated 19 November 2024).

"National Landscape is as designated an Area of Outstanding Natural Beauty (AONB). Paragraphs 6.3.5 and 6.3.7-6.3.10 of Planning Policy Wales (12th Edition) outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty, including the wildlife and cultural heritage, of designated AONBs.

As a statutory plan, the Wye Valley AONB Management Plan 2021-2026 is a material planning consideration in decision-making. Strategic Objective WV-D3 states "Resist inappropriate development which will create a persistent and dominant feature out of keeping with the landscape of the AONB and/or if it damages Special Qualities in the AONB, including through high levels of noise and/or light pollution or any SAC, SPA or Ramsar site or other sites designated as environmentally important."

The site is in close proximity and therefore in the setting of the National Landscape, contributing to the overall Special Qualities of the designated area as identified in the Management Plan (Table 8). The impact could impact on the following Special Qualities:

SQ 1. Landscape Management Zones: LMZ09 Wye Gorge, LMZ13 Devauden Escarpment and possibly LMZ11 River Trothy Convergence

SQ 2. Woodlands: particularly Wye Valley Woodlands SAC and especially Fiddler's Elbow SSSI & NNR and Priory Grove & Beaulieu Wood (Woodland Trust woods) and the Redding's Inclosure (public forest estate woodland)

SQ 3. The river & tributaries: parts of the site would be visible to canoeists & rowers on the River Wye, eg in the reach around Dixton Church. There may also be implications for water quality and run off for the River Wye SAC & SSSI.

SQ 11. Picturesque, extensive & dramatic views: the site will be very visible from The Kymin and possibly from Little Doward, Near Harkening Rock and the Suck Stone. The dramatic view of Monmouth seen when descending the B4293 from Lydart would also be affected by this development.

SQ 12. Overall sense of tranquillity: increasing traffic from individual vehicles and construction as a result of expanding development, along with increased lighting all lead to a loss of tranquillity and sense of remoteness.

SQ 13 to 18. Historic Environment: as identified by CADW's response to the application, there would be impacts on a number of heritage features within and in the setting of the National Landscape.

SQ 23. Offa's Dyke Path: the development would be visible from the Offa's Dyke Path National Trail coming down from the Kymin.

SQ 24. Wye Valley Walk: the development would probably be visible from the Wye Valley Walk on the approaches to Dixton Church.

Section 85 of the Countryside and Rights of Way Act (2000) also states that in "exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in Wales, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

2.16 Site HA4 is within the "Setting" of a Scheduled Monument

The historic landscape in the area of Site HA4 Dixton Road is very significant.

[Refer to report Pages 28 to 30]

2.16.1 LANDMAP sensitivity value of Outstanding/ High for historical interest

The site has a LANDMAP sensitivity value of Outstanding/ High for historical interest.

It is close to a number of Historic Features

- It is within 180 metres of a Scheduled Ancient Monument (Dixton Mound)
- It is located within 40 metres of a Conservation Zone (Dixton Conservation Zone)
- It is also next to a Roman Road – from Blestium to Ariconium (Weston under Penyard) (Margary 612a).
- There is a Roman Metalworking site under the fields. (PRN 02968g)

Originally the site was farmland for the world-famous Monmouth Priory (attached to Priory Farm). The land was unusual in that being Priory Land it was exempt from Tithes.

2.16.2 A Historically Sensitive Site

Dixton Mound, a Scheduled Monument, is a Norman earthwork motte dating from the 11th/ 12th Century with a setting in the medieval landscape.

Standing by the mound you get a real sense of why it was built where it was. It is near a notch in the Wye Valley and guards the defensive access to Monmouth from the North. As you look towards Monmouth you see the settlement of Monmouth on the hill. It is not hard to imagine why it was built in this location, and how it would act as an outer defence for Monmouth Castle (the birthplace of Henry V).

The fields at the development site have a special local interest. They were closely associated with the motte and were the farm fields for Monmouth Priory, and known locally as the Priory Fields.

The Priory Fields were protected in Medieval and Victorian times and were interesting as they were listed as Free of Tythes, in the early local tythe maps. Because of this protection they were not developed and show the medieval landscape, as it was at the time of building of Dixton Mound.

The Landscape is listed as part of the Monmouthshire Landscape Sensitivity Update Study (2020) – Zone M16- as having a LANDMAP value of outstanding for historic landscape and cultural landscape and high for visual and sensory.

Roman pottery, dated to the 2nd century AD, and sherds of medieval pottery dated to the 11th and 12th centuries AD have been found in erosion scars on the site.

According to Archwilio, there is a Roman Metalworking site in the development site (PRN 02968g).

The development site is also within the Landscape Setting, and very visible from, two nearby Conservation Areas.

The Roman Road from (Monmouth) Blestium to Western Under Penyard (Ariconium) runs along the bottom of the site. Roman Road course described by Ivan D Margary as 612a, is probably under Dixton Road, which is the site entrance. It is quite possible that the road may lie under the bottom of the site.

I am not aware of any archaeological excavations on the site, but there are some very intriguing lumps and bumps in the fields that are visible from residents' gardens on the Hereford Road, Monmouth.

Development within 500 metres of a Scheduled Ancient Monument

Dixton Mound is a Norman earthwork motte, founded by William fitz Osborn. Excavations revealed occupation in the 11th and 12th century.

It is located only 180 metres from the Ha4 Dixton Road site.

Cadw's rules (Setting of Historic Assets in Wales) state

"Local planning authorities must consult the Welsh Government's Historic Environment Service (Cadw) on all planning applications which in their opinion are within the setting of a scheduled monument."

Criteria: - Development likely to be visible from a scheduled monument and which meets the following criteria:

• it is within a distance of 0.5 kilometres from any point of the perimeter of a scheduled monument

[Source Technical advice note (TAN) 24: the historic environment [https://www.gov.wales/technical-advice-note-tan-24-historic-environment]

[Source: Setting of Historic Assets in Wales [3https://cadw.gov.wales/sites/default/files/2019-05/Setting%20of%20Historic%20Assets%20in%20Wales%20EN.pdf]

2.16.3 Objections from Cadw

Cadw have raised objections. In response to planning application DM/2024/01250 (an EIA Screening Request) they highlighted the following objections (dated 12 November 2024).

“The proposed development area is located some 40m from the boundary of the Dixton Conservation Area and some 180m from the boundary of scheduled monument MM125 Dixton Mound. It forms part of the agricultural landscape, both present and past, surrounding both of these designated historic assets which contributes to their significance. The proposed development will bring modern, dense development much closer to the designated historic assets and will be clearly visible from them. As such, there is a clear likelihood that it will have an unacceptably damaging effect upon the settings of scheduled monument MM125 and the Dixton Conservation Area.”

“The boundary of the registered Lower Wye Valley landscape of outstanding historic interest is immediately adjacent to the southern boundary, along the north side of Dixton Road. The main access for the development will cross this boundary. The proposed development will therefore impact on the setting of the registered historic landscape but given the close proximity of the modern Dixton area suburb of Monmouth, it is unlikely that this effect will be significant”.

“The proposed development area contains an archaeological site included in the statutory Historic Environment Record PRN 02968g Metalworking Site Near Dixton, where apart from evidence of metalworking, Roman and medieval pottery has been discovered. The extent nature and importance of this site is not currently known but it could be of national importance. Without considerable further information on this site, the scale of impact caused by the development is unknown. The information above clearly indicates that the proposed development is likely to have significant impact on the historic environment including designated historic assets”.

2.17 Loss of Prime Agricultural Land

[Refer to report – Pages 31 to 33]

Welsh Planning Rules State

‘…agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future.’

‘If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade’.

[Source: Planning Policy Wales - Edition 12 (gov.wales)]

Dixton Road Site is Prime Agricultural Land – Mainly Grade 2 (the Highest Grade in the Monmouth Area)

The HA4 Dixton Road Site Land is 80% Grade 2 and 20% Grade 3a.

Source: **Predictive Agricultural Land Classification (ALC) Map 2**
[Welsh Government]
https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2

The Wonastow Road should have been selected as it is of Lower Grade Agricultural Land - mainly Grade 3a

The CS0274 Wonastow Site Land is 60% Grade 3a, 35% Grade 2 and 5% Grade 3b

The CS0274 Wonastow Road site should have been selected instead of the HA4 Dixton Road Site.

2.17.1 Agricultural Land Assessment confirmed in the ISA

An evaluation of agricultural land quality in Monmouth was considered in the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP). ISA Report accompanying the Deposit Plan (September 2024).

This confirms that Option G (CS0274 Wonastow Road) is the most suitable site. It then goes on to say that Option I (HA4 Dixton Road) is the worse performing.

"Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options Prepared for: Monmouthshire County Council AECOM 200 ISA for the Monmouthshire RLDP ISA Report for the Draft Deposit Plan has been based on the Predictive ALC model for Wales (2017).67 The area containing Option I was found to be entirely Grade 2, and the area containing Option H was found to be entirely Grade 3a. The area containing Option G however was found to be partially Grade 3a and partially Grade 3b. Option G is therefore best performing of the Options, given it includes a reduced amount of BMV agricultural land. All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Option G is best performing in relation to protecting the County's soil/ land resource."

The report concludes with "In terms of ranking the Options, Option G is best performing given it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H"

In summary of all the points I would direct you to Planning Policy Wales.

"development should be directed to land of the lowest grade"

This would mean that on the basis of Agricultural Land, development in Monmouth should be targeted at CS0274 Wonastow Road and not site HA4 (Dixton Road).

2.18 Landscape Sensitivity

[Refer to Report Page 34]

Monmouthshire Council's Landscape Sensitivity report recommends

"The area which has the most opportunity is west of recent expansion at Wonastow (M07)"

Natural resources Wales state "Landscape Sensitivity Assessments are used in spatial planning to help guide development or land management changes to less sensitive landscape locations".

[Sources : Monmouthshire Landscape Sensitivity Update Study (White Consultants)]

[Natural Resources NRW Landscape Sensitivity Website Page]

HA4 Dixton Road Site Landscape Sensitivity is High/ Medium

CS0274 Wonastow Road is in Area (M07) Sensitivity is Medium

[Source: Monmouthshire LLCAs]

This is yet another area where Monmouthshire County Council have overlooked site CS0274 (Wonastow Road) and instead selected the more sensitive site HA4 (Dixton Road).

Why has Monmouthshire County Council not followed the recommendations of its own report?

2.19 Flooding to Site Entrance

The road entrance to the site is in a flood zone and regularly floods. This could cause problems for emergency vehicles getting to the site.

[Refer to Report – Pages 35 – 37]

The developer has proposed to put the SuDS in the flood zone.

Resident Photo taken Feb 2024 about 24 hours after heavy rain
Note the red clay colour of the runoff water

[Source : https ://datamap.gov.wales/layergroups/inspire-nrw:FloodRiskAssessmentWales]

The Wonastow Road site has less flooding issues

Predominantly Zone 1. Small amount of Zone 2/3 Surface Water Flooding within site.

"While further assessment needs to be undertaken on Surface Water Flooding the amount on site is minimal and likely to be overcome. "

[Source: Monmouthshire Replacement Local Development Plan Candidate Sites High-Level Assessment as amended (July 2023)]

2.20 Is 50% Affordable Housing realistic?

There are major concerns on the whether a 50% affordable housing target is realistic.

[Source : https ://www.localgovernmentlawyer.co.uk/planning/401-planning-news/58403-developer-pulls-applications-over-spectre-of-50-affordable-housing-proposal]

According to an article in Local Government Lawyer (3 September 2024) "The country's largest housebuilder has decided to withdraw a series of planning applications due to concerns about the Government's plan to include a 50% affordable housing requirement for green belt sites under an updated National Planning Policy Framework (NPPF)".

> "Philip Barnes, Group Land Director at Barratt Developments, warned that the affordable housing policy would deter developers from building on green belt land.
>
> In a blog post published last week (28 August), he said that Barratt has pulled three "in-flight" planning applications being prepared on draft allocated sites "because the spectre of 50% renders the scheme unviable due to the unacceptably reduced (or removed) land value for the landowner".
>
> According to Barnes, existing green belt sites in a draft local plan allocated for housing "will not be able to provide 50% affordable housing".
>
> He added: "Even a Reg 18 plan will have been viability tested against a lower affordable housing percentage, so a change to the 50% affordable 'ask' will upend the whole plan.

> Barnes, who said he has discussed the changes with "peers, public and private sector planners, land agents, lawyers, land promoters and landowners", also raised questions about the consultation's land value proposals.
>
> "Everyone seems to be in full agreement – namely that the proposed disruption to the land market is likely to cause many in-flight schemes to be abandoned and stymie many other upcoming projects," he said.
>
> "Why? Because many landowners aren't going to sell their land in such a policy environment.""

It should be noted that [redacted] works for the same organisation [redacted], that are the developer for the HA4 Dixton Road site.

It seems quite possible that they will argue that the 50% Affordable Housing is realistic to get site HA4 included in the approved Local Development Plan.

It is then quite possible that "unexpected costs" may later appear.

Such "unexpected costs" may include

- the cost of the sewer upgrade (could run to £millions)
- mitigation measures for the Greater Horseshoe Bats
- screening costs to hide the development from the Scheduled Monument
- screening costs to hide the development from the National Landscape
- or extra drainage costs because SuDS is not effective on Phopsphates
- extra costs from making houses Carbon Neutral

All of these costs may put extra strain on Redrow's margins, which I believe would make it likely they will argue will mean that the 50% affordable housing target will need to be cut.

20.20.1 Developers can use viability assessments to keep profits to 20%

According to a report by the Campaign for Rural England there is a legal planning loophole that undercuts affordable housing.

[Source : https ://www.cpre.org.uk/wp-content/uploads/2019/11/CPRE_Rural_viability_report_v5_FINALZ1.pdf]

> "Developers can use viability assessments to argue that building affordable homes could reduce their profits below competitive levels, which they define as around 20%. This gives them a legal right to cut their affordable housing quota.
>
> That means developers can overpay for land to guarantee they win sites, safe in the knowledge they will be able to recoup the costs later by
>
> squeezing out affordable housing. The same is true for land promoters, who often negotiate away affordable housing quotas before selling sites on to developers. This viability loophole is contributing to the country's affordable housing drought, reducing the social diversity and vitality of rural communities."

2.20.1 Monmouthshire Council has accepted lower percentages

And Monmouthshire County council has previously allowed lower numbers of social houses.

The site of a shop in Llandogo is to be redeveloped for houses. The shop is in a beautiful area of the Wye Valley Natural Landscape and was featured in the [redacted] This was due to be 4 houses of which a 35% affordable housing allocation of one house would be worth at least £250,000. The other executive houses would be worth in excess of £600,000.

But according to an article in the Monmouthshire Beacon (9th August 2024) instead of 35% affordable housing (worth possibly £250,000) the council the council agreed to £20,000.

> "The committee was told the council's usual policy would require 35 per cent of the homes, on site, to be affordable but planning officer Amy Longford said its independent consultants had accepted that would make the development "unviable".
>
> Instead the council will accept a contribution "just shy" of £20,000 towards affordable housing elsewhere in the county, which will be secured through a section 106 legal agreement."

[Source: Monmouthsire Beacon – Sex Education shop to be knocked down | monmouthshirebeacon.co.uk]

In summary I do not believe that 50% Affordable Housing could be delivered.

2.21 Spatial Strategy – Share of settlements

Is Chepstow getting its fair share of housing?

I was rather surprised to look in the RLDP at where the primary housing is located.

One location seems to jump out – Chepstow! This seems surprising, given that since tolls were removed on the Severn Bridge it is within easy commuting distance of well-paid jobs in North Bristol.

Housing Allocation Primary Settlements

	Population	RLDP New Houses	Total	New Houses Per 1000	Railway Station?
Abergavenny	12,515	500 + 100	600	47.9	Y
Chepstow	12,350	146	146	11.8	Y
Monmouth	10,508	270 + 60 + 110 + 50	490	46.6	N
Caldicot	9,813	770	770	78.5	Y

2.22 Policy GW1 – Green Wedges

Policy GW1 Green Wedge Designations do not include Monmouth.

There is a Green Wedge around the Brecon Beacons National Park. But there is no Green Wedge around the Wye Valley National Landscape (AONB).

In law a National Park and an AONB enjoy the same level of protection.

So, if the Brecon Beacons National Park has a green wedge, then there should be a green wedge around the Wye Valley National Landscape (AONB) to cover the Landscape Setting.

2.23 Welsh Language

A key part of the Deposit Plan is that it should define how Monmouthshire can improve people's access to the Welsh Language.

The choice of HA4 Dixton Road is detrimental to that objective, as the nearest Welsh Language School, Ysgol Gymraeg Trefynwy, is 3500 metres distance away, far too far to be easily accessible.

According to Council Website, free School transport will be available for school age pupils who live more than 1.5 miles (2400 metres) from the school and reside within the catchment area. Providing free buses and taxis, will cost more money for an already cash-strapped council.

[Source: Take a sneak peek at the plans for Ysgol Gymraeg Trefynwy – Monmouthshire]

The school is currently underoccupied – with only 20 pupils registered as of October 2023.

[Source : https ://www.southwalesargus.co.uk/news/24657484.monmouths-new-welsh-medium-primary-20-pupils-roll/]

The alternative site CS0274 (Wonastow Road) is only 1300 metres from the school and is accessible by an Active Travel Route close by. Children could then walk to school. This removes the need for expensive school transport – with the increased air pollution that it brings. Walking to school also improves the fitness of our younger generation as well as improving mental health.

3. Alternative Site for Monmouth

I believe that there is a better site for housing in Monmouth.

It is Candidate Site CS0274 Land at Wonastow Road, Monmouth.

This has been overlooked by Monmouthshire County Council. It offers both housing and employment land and is a much less sensitive site than HA4 Dixton Road.

[Refer to Report – Pages 40 – 41]

3.1 CS0274 Wonastow Road is a better site for Monmouth

The Wonastow Road site is a mixed use site for 175 houses, offering 2 hectares of employment land.

Within easy walking distance of some of Monmouth's largest businesses.

- Siltbusters
- Triwall
- Singleton Court
- Mandarin Stone

Traffic is further away from major pinch points and can distribute in different directions through the Link Road and Wonastow Road.

The Wonastow Road Site is better served by Active Travel.

It is also on a major cycle route National Cycle Route 423.

3.2 Integrated Sustainability Appraisal (ISA) report ranks CS0274 highest and HA4 site lowest

Monmouthshire Integrated Sustainability Appraisal (ISA) compared the merits of 3 candidate sites.

- CS0274 Wonastow Road (Land West of Monmouth - Option G)
- CS0271 Vauxhall Fields (Land in Central Monmouth - Option H)
- HA4 Dixton Road/ Leasbrook (Land North-East of Monmouth - Option I)

It ranked them in order, for a number of factors, with 1 being the highest rank and 3 the lowest.

If you add the scores up, it is possible to generate an average rank of all the sites.

CS0274 Land at Wonastow Road ranks best for all of the sites in Monmouth.

In contrast Site HA4 Dixton Road ranks the lowest.

	Option G – Land west of Monmouth Wonastow Road	Option H – Land in central Monmouth Vauxhall	Option I Land north east of Monmouth (Dixton/ Leasbrook)
Economy and employment	2	1	3
Population and communities	2	1	1
Health and wellbeing	1	1	1
Equalities, diversity, and social inclusion	=	=	
Natural resources (air, land, minerals, and water)	1	2	3
Biodiversity and geodiversity	1	1	2
Historic environment	1	2	3
Landscape	1	2	2
Climate change (including flood risk	=	=	=
Total Score (Lower is better)	**9**	**10**	**15**
Average Rank (Lower is better)	**1.29**	**1.43**	**2.14**

[Source: My analysis of results from the Monmouthshire Council's Integrated Sustainability Appraisal (ISA) report https://www.monmouthshire.gov.uk/app/uploads/2024/10/Monmouthshire-RLDP-ISA-Report.pdf]

Monmouthshire County Council seem to have ignored this information.

Instead of this assessment Monmouthshire County Council, as part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'.

They made clear at that time that this was not part of the formal consultation, but said that the results provide a helpful indication of public opinion.

	Upvotes	Downvotes	Net Score
Option G – (CS0274 Wonastow Road)	270	175	95
Option H – (CS0271 Vauxhall Fields)	255	189	66
Option I – (HA4 Dixton Road)	318	248	70

The ISA only looked at the Upvotes and did not look at the number of Downvotes. If you compare the two – you arrive at the net score.

This again shows CS0274 Wonastow Road as having the best score and HA4 Dixton Road as having the lowest score.

[Source : Monmouthshire-LDP-AMR-2021-2022.pdf]

But you have to question the legitimacy of using 'Placecheck' for site selection. The Council made it clear that this was not part of the formal consultation, but are now using it for site selection.

One other factor was at the time there was a ban on new housing in Monmouth due to the Phosphate issues.

In January 2021, Natural Resources Wales (NRW) published evidence showing many riverine Special Areas of Conservation (SAC) waterbodies were failing phosphorous standards. Monmouthshire County Council then responded by introducing measures to prevent building new houses in Monmouth. So, the July 2021 exercise would have received limited responses from the citizens of Monmouth.

I believe that the Integrated Sustainability Appraisal (ISA) report clearly shows that the site CS0274 Wonastow Road, Monmouth should have been chosen in preference to the HA4 Dixton Road site.

3.3 Monmouth Town Council see CS0274 as the suitable site for Monmouth

At a Full Council Meeting of the Monmouth Town council (18 November 2024) they passed two resolutions expressing concerns about HA4 Dixton Road and also about the suitability of CS0274 Wonastow Road. **The votes on these were unanimous in favour.**

These resolutions were to form the Town Council's response to the RLDP.

Resolution 1 – Concerns about the site on Dixton Road

> **[Source: Extract of meeting minutes**
> (Public Pack)Minutes Document for Full Council, 18/11/2024 19:00]
>
> It was resolved to make the following recommendation to Full Council in response to the RLDP Consultation on the Leasbrook (Dixton Road) Site:
> (i) There is a need for affordable housing in Monmouth;
> (ii) Uncertainty regarding the suitability of location for the development due to :
> • Extensive local objections,
> • the lack of employment land nearby,
> • the potential increase in traffic congestion and subsequent air pollution,
> • the potential decline in drinking water quality,

• the negative impact on the environment in which it would sit (AONB and rare bat roosts nearby),
• the loss of arable agricultural land and,
• the impact on the nearby Scheduled Ancient Monument (SAM) and the real potential for loss or destruction of archaeological remains.

Resolution 2 – Suitability of the CS0274 Wonastow Road Site

(b) It was resolved to make the following recommendation to Full Council in response to the RLDP Consultation on the CS074 (Land at Wonastow Road) Site:
(i) There is a need for more housing in Monmouth particularly affordable housing;
(ii) **The site was deemed suitable for a development** of the proposed size due to:
• Its proximity to the National Cycle trail and Active Travel route,
• it is closer to employment and retail infrastructure,
• it is in-keeping with surrounding developments and is down-stream of the [Welsh Water Treatment Works] WWTW, therefore, less likely to be impacted by the poor drinking water quality."

Monmouth Town Council are elected to represent the views of the Monmouth Residents.

Monmouth Town Council have made it quite clear that the CS0274 Wonastow Road site is the better site for Monmouth.

4. Conclusion

Based on the detailed analysis above, the proposed development at Dixton Road, Monmouth (HA4, also known as Leasbrook, CS0270), is inappropriate due to significant issues across several critical categories:

Environmental Sensitivity

- The site is within 1km of the Newton Court SSSI, home to endangered Greater Horseshoe Bats. Development would destroy crucial bat habitats, including foraging grounds, commuting routes, and hedgerows, while introducing harmful artificial lighting.
- It is within the highly sensitive landscape setting of the Wye Valley AONB and the Dixton Mound Scheduled Monument, both protected areas of national importance.
- Development would result in the loss of high-quality prime agricultural land (80% Grade 2), contrary to national planning policy, which prioritizes lower-grade land for development.

Water Quality and Pollution Risks

- The site poses a direct risk to Monmouth's drinking water, drawn from the River Wye, a Special Area of Conservation (SAC). The river is already under advisory notices for contaminants, including Cryptosporidium, with necessary upgrades to water treatment delayed until 2030.
- Surface runoff pollution from clay-heavy soil would exacerbate phosphate levels in the River Wye, with SuDS drainage solutions shown to be ineffective for phosphate removal in this context.

- Rainfall runoff would flow into waterways only 400m upstream of the drinking water extraction point, creating additional health and ecological risks.

Traffic Congestion and Air Pollution

- The entrance to the site is only 100m from the congested Dixton Roundabout, a known bottleneck for Monmouth. Adding 405 vehicles (270 houses) would further increase journey times and delays for residents.
- The development would generate an estimated 476 tonnes of CO2 annually and increase local air pollution. Monmouthshire currently lacks proper monitoring of PM2.5, a more dangerous pollutant.
- Active travel options are limited, with no nearby cycle routes or pedestrian-friendly infrastructure, making car reliance inevitable. In contrast, the alternative Wonastow Road site is well-served by cycling and walking routes.

Flooding Risks

- Approximately 15% of the site lies in a flood zone, which could hinder emergency access.
- The alternative Wonastow Road site has minimal flood risk (5%) and better infrastructure for addressing surface water challenges.

Failure to Follow Policy Guidance

- The site selection contradicts Planning Policy Wales, which emphasizes prioritizing lower-grade agricultural land, avoiding sensitive landscapes, and protecting biodiversity.
- The Sweetman Judgement was not taking into account when screening a site for loss of functionally-linked land withing the 3Km Cores Sustenance Zone of a Natura 200 (European Site)

I believe that the development at HA4 Dixton Road is incompatible with sustainable development goals, biodiversity protections, and responsible urban planning.

The alternative site at Wonastow Road (CS0274) provides a far better option for delivering much-needed housing while protecting Monmouth's environment, heritage, and infrastructure.

Monmouthshire County Council must reassess this proposal and prioritize sustainable, appropriate development.

Monmouth is the Jewel in its Surrounding Countryside
- let's keep it that way

[redacted]

CS0274 (Wonastow Road) is a More Suitable Site

Site Number	CS0270	CS0274
Site Name	Dixton Road/ Leasbrook	Land at Wonastow Road
Number of Houses	270	175
Social Housing Provision	50%	50%
Employment Land	No	2 hectares
Near an Active Travel Route	Nearest Cycle Lane 2km away	National Cycle Route 423 passes the site. Active Travel routes planned.
Upstream of Drinking Water Supply	Yes	No
In area failing SAC Phosphate Targets	Yes	No
Prime Agricultural Land	Grade 2 (80%)	Grade 3a (60%)
Bats - site in 3km Core Sustenance Zone	Yes - within 1Km of rare bat roost	No
In Landscape Setting of AONB	Yes Within 250 metres of Wye Valley AONB	No
Setting of Scheduled Monument	Yes within 180 metres of Dixton Mound	No
Flooding - In Zone 2 and 3	Around 15%	Around 5%
Traffic Congestion to Trunk Roads	High - with 100 metres of major pinch point - Dixton Roundabout	Medium
LANDMAP Landscape Sensitivity	High/Medium	Medium

View results

Respondent

515 Anonymous

14:13

Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

9. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

10. Would you like to comment on this question *

- (●) Yes
- ( ) No

11. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

12. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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PAGE 12 - I don't agree that the land recorded as east of Little Mill be included in the plan. The road and transport infrastructure is not present in Little Mill. You want 50% affordable housing but there are no shops, poor bus connections and it is too far from Usk or Pontypool to walk. You are also proposing building on open green fields, there are surely better sites to put 20 houses on. The traffic through the village never goes at 20mph, cars race through and more people will likely lead to more accidents. Also there is also a massive problem with drainage and run off from the surrounding fields which has never been addressed with localised flooding and more concrete is only like to make this worse. I think it would also have a detrimental effect on the wildlife and one of the main reasons moving here was the rural nature of the area. if you develop it further I think you might find people start moving away

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- ○ Yes
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Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

15. Would you like to comment on this question *

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16. Would you like to comment on this question *

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17. Would you like to comment on this question *

- ○ Yes
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    see previous comments are Little Mill proposed site - object

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27. Would you like to comment on this question *

- ○ Yes
- ◉ No

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- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

29. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

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[redacted]

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3236

Dr Jonathan Ryder

View results

Respondent

515 Anonymous

14:13

Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

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- ◉ No

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24. Would you like to comment on this question *

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- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

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- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

29. Would you like to comment on this question *

- ○ Yes
- ◉ No

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- ○ Yes
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[redacted]

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3249

Mrs Lisa Riddington

View results

Respondent

30 Anonymous

23:05
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

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5. Address *

[redacted]

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[redacted]

Part 2: Your Representation

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- ○ Yes
- ◉ No

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- ○ Yes
- ◉ No

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- ○ Yes
- ◉ No

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11. Would you like to comment on this question *

- ○ Yes
- ◉ No

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- (•) No

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- (•) Yes
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HA3. The proposed housing development near High Beech Roundabout, Chepstow. Before any new housing can be considered in Chepstow, the infrastructure of the town needs to be reviewed and improved. Currently it is difficult to get health appointments, school places are scarce - more residents will increase this burden. Furthermore the traffic congestion particularly at High Beech Roundabout during rush hours is in tolerable and housing in this location will add to the environmental impact of our town. Hardwick Hill is already one of the most polluted roads in the UK. The change that needs to be made is to first improve the infrastructure, roads and services, before considering further housing in Chepstow

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

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- ( ) Yes
- (•) No

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- ○ Yes
- ◉ No

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18.2.6 - camping, touring and glamping. I am in favour of increasing camping and touring facilities in monmouthshire. There is a considerable lack of touring caravan sites and the economic advantages having tourists who use this popular mode of holidaying will be significant. I would like to propose whether the Monmouthshire council would consider piloting the use of Motorhomes and caravans staying overnight in car parks as they have in Powys - https://en.powys.gov.uk/article/4696/Car-Park-Charges this would bring in much needed economic boost to the towns economy such as the hospitality industry and retail

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

25. Would you like to comment on this question *

- ◉ Yes
- ○ No

26. Is your representation in support or objection? *

- ○ Support
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*

Active travel - whilst this is a good thing, I would question whether this is achievable and if it is worth the expenditure. Mainly because we live in an undulating and hilly county and unless you are quite fit using active travel methods such as cycling to get to places (as opposed to a day out cycling for pleasure) is probably not possible for the majority of the population.

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

28. Would you like to comment on this question *

- ○ Yes
- ◉ No

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Building more houses in areas which already do not have the infrastructure in place to cope with residents will result in a greater impact on the environment, health of communities and education. We need more housing but these improvements have to be made first.

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No effect

37. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

No effect

[redacted]

3258

Mr H Matthews

View results

Respondent

394 Anonymous

99:54

Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

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Policy HA17 - Land adjacent to Llanellen Court Farm, Llanellen.

We have lived in our bungalow for 27 years and feel that the development of this land is unsuitable for the following reasons :-

1. The bottom of the hill is more prone to flooding than when we first moved here, probably due to more frequent storms. Our own garden is very flat, at the foot of the slope and is often waterlogged in bad weather. The water run-off from this area onto the A4042 already causes flooding problems for the lowest part of the village near the old post office/old craft shop. The change from green fields to housing & hard landscaping will only exacerbate the problem.

2. We would question the capacity of the local treatment works to process any further sewage.

3. Access to and from the site would be directly onto the busy and fast A4042, creating potential traffic conflict.

4. If the development of agricultural barns near the site goes ahead it would create even more traffic problems.

5. There is already a dearth of amenities in the area including GPs, hospital services, schools etc.

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

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- [ ] Yes
- [x] No

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- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

28. Do you consider that the Plan is sound? *

- (●) Yes
- ( ) No

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

29. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- ( ) Yes
- (●) No

Part 5: Welsh Language

30. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

31. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

3260

Mr Mark Le Moignan

View results

Respondent

192 Anonymous

54:48
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- (●) Yes
- ( ) No

9. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

I refer to the RLDP plan for Twenty Six dwellings at Llanellen.
I object to this planning application on the below grounds:

Storm Bert 23/24 November 2024.

The above is a classic example as to why development on the piece of land attached to Llanellen Court Farm should not be granted.

It is well known throughout the community that this piece of land is at constant flood risk whenever there is anything other than gradual rainfall.

The field is not able to absorb rainwater or any other adverse weather effects and constantly floods directly onto the main arterial route of the A4042 causing delays and road closures.

As a direct consequence of the above storm my wife was unable to attend her place of work together with colleagues [redacted] due to the direct issues caused by this particular field flooding deep water onto the main carriageway.
The road was closed as a result.

At the planning meeting that myself and my wife attended, I noted that Welsh Water will be apparently upgrading sewerage as part of the proposed development.

However my objection to any development on this piece of land highlights two areas of concern to ourselves.

This land cannot cope with anything other than gradual rain from period to period, the proposal of 'Filling' the land with twenty six properties will only increase the amount of water overspill onto the main arterial route A4042.

This will increase road closures and potential accidents occurring along the stretch of the A4042 directly along the entire frontage to the development proposed.

While covering the land with roads, paths, driveways etc will lead to faster water movement towards the carriageway and NOT stop it via road drainage.

There are several trees that must in my opinion remain as part of the proposal, with the inevitable consequences of leaf blockages and diversion of water onto the A4042 road surface as a result.

Whilst I appreciate that Welsh Water have apparently agreed to upgrade sewerage and drainage on this site there will inevitably be further damage caused to the very nearby River Usk.

This water will have nowhere to go in such circumstances and will only back up onto more land and carriageways already affected by such heavy rain and weather conditions directly opposite the proposed development and nearby properties.

With that will no doubt come further contaminents that will directly feed into the River Usk as a result.

We know that Welsh Waters record on sewerage pollution within the River Usk has been well documented, this will only increase the pressure to release sewerage contaminated water again into the river together with other polluting items which can only result in killing off more of the Usk itself.

We are constantly being reminded in Wales that we are living in a 'Climate Emergency ' where weather conditions such as we are now experiencing will become the new normal.

With that also a consideration, clearly events of heavy and prolonged rain, wind, snow etc will only serve to make this stretch of road which is a vital route for all transport, and in particular, Emergency Vehicles to and from Neville Hall and The Grange Hospitals a very real hazard in future as it currently stands.

The addition of houses being built at Llanellen Court Farm will in my view only exacerbate the problems outlined in my objection together with the safety of all road and pedestrian users alike.

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

11. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

12. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

13. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

16. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

17. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

18. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

19. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

20. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

21. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

22. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

23. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

25. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

28. Do you consider that the Plan is sound? *

- ( ) Yes
- (●) No

29. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? *

- [ ] Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- [ ] Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- [x] Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- [x] Fails Test 3: Will the Plan deliver (is it likely to be effective)?

30. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): *

Please see my objection as an answer to this question

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

31. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- (●) Yes
- ( ) No

32. If you wish to speak at a hearing session which language would you wish to use?

- ( ) Welsh
- (●) English

Part 5: Welsh Language

33. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I cannot see any benefits to the Welsh Language other than trying to satisfy a target for the Welsh assembly in its ridiculous aim currently forcing a policy on people who clearly don't need or use it in everyday language throughout this area.

34. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

None

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.
You are not obliged to complete these questions and can select 'prefer not to say'.

[redacted]

3267

Mr Neil O’Doherty

View results

Respondent

68 Anonymous

11:35
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

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- ◉ No

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- ○ Yes
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- ○ Yes
- ◉ No

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13. Would you like to comment on this question *

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- ◉ No

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14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

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17. Would you like to comment on this question *

- ◉ Yes
- ○ No

18. Is your representation in support or objection? *

- ◉ Support
- ○ Objection

19. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Re: Leasbrook in Monmouth.
I fully support the development outline. The addition of affordable housing at 50% of the development is a critical and essential part of the proposal. The opportunity for people, including my children , to have access to a sensible supply of affordable homes is key to the long term viability of our community. Thought must be given to supporting infrastructure in terms of health care provision(I note the application for permission for a new healthcare centre on Osbaston Lane) and it needs to be clear that this facility can support the addition population that will live on the development. Broadly sparkly this looks like an additional population of c1000 people. That is good but what does it mean for schooling capacity?
I also encourage the implementation of lights on the Dixton Roundabout-it is difficult to access the roundabout from Monmouth already without the traffic this site will generate.

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

20. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

21. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

22. Would you like to comment on this question *

- ○ Yes
- ◉ No

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- ○ Yes
- ◉ No

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24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

25. Would you like to comment on this question *

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- ◉ No

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26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

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- ○ No

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- ○ Yes
- ◉ No

Part 5: Welsh Language

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31. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

3268

Chris Goldsbrough

Archived: 13 February 2025 07:28:00
From: [redacted]
Mail received time: Tue, 19 Nov 2024 12:12:32
Sent: Tue, 19 Nov 2024 12:12:23
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Response the RLDP - 270 Houses on fields off Dixton Road - HS04 (CS0270)
Importance: High
Sensitivity: None

Dear Sirs

Whilst I understand the need for more social housing, I believe it needs to be the [redacted] with the right infrastructure. I fail to understand how this site can even be under consideration as it is a hugely sensitive site in terms of its landscape, ecological significance, history and traffic pinch points, particularly when other sites up for consideration eg., that at Wonastow Road (CS0274) do not pose these issues.

My particular concerns in summary are:
Water quality & pollution
Air quality
Increased traffic congestion, road safety and Active Travel challenges
Environmental issues including removing the food source of the rare Great Horseshoe Bats, proximity to the AONB and the loss of high grade farmland when other sites offer lower grade land
Availability of school places
Insufficient medical capacity ie., doctors/dentists
Limited job opportunities
Concern about future expansion

In detail:
Water Quality and Pollution
Drinking Water Contamination: The polluted River Wye, Monmouth's drinking water source, is in a Special Area of Conservation for Phosphates and has two warnings from the Drinking Water Inspectorate, including Cryptosporidium risk. Necessary treatment upgrades won't be complete until 2030 and will not benefit the houses on the proposed Dixton Road site.
Surface Run-off Pollution: Welsh Water extract Monmouth's Drinking Water 400 metres downstream (near the Rowing Club) which means rain runoff pollution would contaminate the River Wye about 400m upstream from Monmouth's drinking water intake.
Phosphate Pollution: Additional rainwater runoff would increase phosphate levels in the river, estimated to add 8 kg/year. Planned wastewater improvements won't reduce phosphates upstream. The upgrade to the Waste Water Treatment Works whilst removing about 90% of Phospates from sewage water **will only benefit the River Wye south of Monmouth not upstream**.
Whilst Site HS04/CS0270 is in the area failing Phosphate targets the alternative site CS0274 is not and therefore would be a more suitable choice.
Ineffectiveness of SuDS: The proposed drainage system (SuDS) is poorly suited for phosphate removal, particularly on the site's clay soil, which has impeded drainage and is often flooded as it was earlier this year. SuDS only have a 15-24% removal rate of Phosphates. SuDS will work better on free draining soils like that at the Wonastow site CS0274

Air Quality
Air Pollution: The area??s current NO?ü levels already exceed WHO guidelines. Extra cars will increase PM2.5 levels, which are not currently monitored. What isn??t measured cannot be improved therefore whilst NO2 levels are monitored (and I understand are already far in excess of the WHO guidelines) why do MCC not monitor the more dangerous PM2.5 and PM10 particulate levels, particularly given the proximity of the Dixton Road development to Monmouth Comprehensive School? The addition of 270 houses and over 400 vehicles will increase air pollution and

estimated CO2 emissions would rise by 476 tonnes annually.

Traffic Congestion & Road Safety
Increased Traffic: The addition of 270 homes would bring 405 vehicles, causing up to 10 extra minutes of travel time during peak hours.
Road Safety: Hereford Road and Dixton Road pose a real safety hazard for pedestrians as the pavements are too narrow to cope with the current flow of people particularly around school times. This means some are forced to walk on the road and with 4490 vehicles a day currently travelling Dixton Road increasing the amount of motorists and pedestrians in this area is simply increasing the risk of accidents. Dixton Roundabout is already a pinch point which again additional motorists will exacerbate. The current congestion is dreadful with a simple journey to Wyesham or Mitchell Troy (less than a mile) often taking 20 – 30 minutes.
The proposed 'emergency exit' onto Hereford Road will create a 'rat run' with vehicles using this to avoid congestion on Dixton Road leading to more congestion and increased road safety issues on Hereford Road, particularly for children at Haberdashers.
Active Travel Challenges: Residents will likely depend on cars, as cycling and pedestrian routes are distant (2km away) and challenging and Monmouth has no rail links and poor bus services. In comparison the Wonastow Road site CS0274 is on a national cycle route and is in walking distance to major job providers ie., Siltbusters, Mandarin Stone, Triwall & Singleton Court.

Protecting the Environment
Biodiversity: The Environment Wales Act (2016) places a legal duty on public authorities to seek to maintain and enhance biodiversity where it is within the proper exercise of their functions. In doing so, public authorities must seek to promote the resilience of
ecosystems. This means that MCC must take a pro-active approach to improve and not reduce biodiversity. How is destroying the feeding zone of the rare Great Horseshoe Bat, removing 20 football pitches of prime grazing land, ripping out established hedges, adding artificial light and interrupting bat commuting lines fulfilling this duty and giving a bio-diversity gain?
Proximity to Wye Valley AONB: The site lies close to this protected landscape, conflicting with policy that discourages major developments near such areas. Planning Policy Wales states: "Major developments should not take place in National Parks or AONBs except in exceptional circumstances." As the Dixton Road Site lies within the setting of the AONB and there are other options available which do not affect a protected landscape eg., Wonastow Road, why is the policy being ignored?
Landscape Sensitivity: The Monmouthshire LLCA identifies the site as highly sensitive, with other less sensitive areas recommended for development. Why has MCC not followed the recommendations of its own report?

The fact that MCC appear to be ignoring their legal duty, planning policy and recommendations of its own report make me extremely concerned that should this development on Dixton Road be approved then future expansion will be almost guaranteed.

These are just some of the concerns that make me completely opposed to the proposed development of 270 houses on fields off Dixton Road particularly as there is an alternative site at Wonastow Road, Monmouth (CS0274) that offers both housing and employment facilities. It is within easy walking distance of major employers such as Siltbusters, Triwall, Singleton Court and Mandarin Stone. The soil is suitable for SuDS (free draining) and the site is downstream of where Monmouth takes its drinking water and will benefit from the upgrade to the water treatment plant in 2030. It is outside the Bat Zone and is less environmentally sensitive and is by a national cycle route.

I look forward to hearing from you.

[redacted]

3269

Christine Voyce

[redacted]

From: [redacted]
Sent: 19 November 2024 11:58
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Revised Local Plan- Dixton Rd site

Dear Planning Team,

I wish to take part in the consultation on the revised draft local plan and register my objection to the plan to build 270 houses on fields off Dixton Rd, Monmouth.

I am a local resident, [redacted]

I have frequently walked footpaths running across fields adjacent to the planning site off Dixton Rd and have noticed that in winter these fields are completely waterlogged, holding back a huge amount of water that will be flowing into the Wye as run-off once this site is developed. The planned SuDS solution to the run off problem will have a limited capacity and may overflow, plus may also fail to remove many key pollutants flowing into the river. The impact on Monmouth's drinking supply, sourced from the Wye downstream of this point, could be significant. There would also be a significant risk of flooding of the main access road, leading to fairly frequent use of the "emergency" access further up Hereford Road.

With huge public concern about the state of our rivers locally, and the state of the Wye in particular, I am amazed and shocked that this site has been identified as the council's preferred site, although I fully understand the urgent need for new housing. I presume that members of the council have been swayed by the fact that this is the largest suggested development in the local plan, but this is really no excuse for backing a site where the complexity of the development and environmental risk is so high. Furthermore, I understand that standard practice in the construction industry in a site so complex would be to ignore many of the environmental protections that they have contracted to put in place and simply pay the paltry fines that result, as this is more cost effective for the industry. There will also be a significant issue with run off to the Wye during heavy rainfall events during the period of construction before systems such as SuDS are functional. Our lovely river is on a knife-edge at the moment and this would be disastrous.

I am also very concerned about such a large development close to the Greater Horseshoe bat roost at Newton Farm.

I urge the planning committee and our local councillors to reconsider a decision that will undoubtedly adversely affect our local environment in Monmouth and will have a wider impact downstream in the River Wye. I have thought long and hard before raising this objection, as I fully support efforts to increase local housing [redacted] but this development will have a far greater environmental impact than alternative sites identified in the revised local plan.

Yours sincerely,

[redacted]

3270

Caroline White

Dear Monmouth CC planning department,

I am writing to object to the proposed development of 240 houses off Dixton Road, Monmouth (RLDP 2018-2033, Site HA4).

Here is a summary of my objections:

Environmental Sensitivity

- **Impact on Rare Bat Habitat:** The site is within the sustenance zone for endangered Greater Horseshoe Bats, which rely on grazing land and hedgerows.
- **Proximity to Wye Valley AONB:** The site lies close to this protected landscape, conflicting with policy that discourages major developments near such areas.
- **Visibility from Dixton Mound:** The site, visible from the historic Dixton Mound, has a high historical landscape sensitivity.
- **Flooding Risks**: About 15% of the site is prone to flooding, potentially hindering emergency access, whereas the Wonastow site has minimal flood risk.
- **General climate and biodiversity issues**. We are in a climate and ecological emergency. Local authorities should be prioritising this when they decide to build new houses. Housing and road development, with its associated environmental destruction, is cited as the main reason for the sharp decline in biodiversity across the UK.

Water Quality and Pollution

- **Drinking Water Contamination:** The River Wye, Monmouth's drinking water source, is in a Special Area of Conservation for Phosphates and has two warnings from the Drinking Water Inspectorate, including Cryptosporidium risk. Necessary treatment upgrades won't be complete until 2030.
- **Surface Run-off Pollution:** Rain runoff pollution would contaminate the River Wye about 400m upstream from Monmouth's drinking water intake.
- **Phosphate Pollution:** Additional rainwater runoff would increase phosphate levels in the river, estimated to add 8 kg/year. Planned wastewater improvements won't reduce phosphates upstream.
- **Ineffectiveness of SuDS:** The proposed drainage system (SuDS) is poorly suited for phosphate removal, particularly on the site's clay soil, which has impeded drainage.

Traffic Congestion:

- **Increased Traffic:** The addition of 270 homes would bring 405 vehicles, causing up to 10 extra minutes of travel time during peak hours. Estimated CO2 emissions would rise by 476 tonnes annually.
- **Air Pollution:** The area's current NO_2 levels already exceed WHO guidelines. Extra cars will increase PM2.5 levels, which are not currently monitored.
- **Active Travel Challenges**: Residents will likely depend on cars, as cycling and pedestrian routes are distant and challenging.

Alternative Site – Wonastow Road

- There is an alternative site at Wonastow Road, Monmouth (CS0274) is that offers both Housing and Employment facilities. It is within easy walking distance of major employers such as Siltbusters, Triwall, Singleton Court and Mandarin Stone. The soil is suitable for SuDS (free draining) and the site is downstream of where Monmouth takes its drinking water. It is outside the Bat Zone, so is less environmentally sensitive.

Please take all these objections into account when you consider this scheme.

[redacted]

3271

John Taylerson

[redacted]

From: [redacted]
Sent: 18 November 2024 12:44
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Planning proposal Dixton Road houses

Hello planning

Having read about and now seen the proposal I wanted to write and contribute to your consultation.

Why has this site been prioritised over patently more suitable sites?

Water pollution; plainly this is only going to contribute to the frequent events we have where rain water in excess of what drains and our local clay can handle. Having gone to great personal expense to develop an on-site 10 metric Tonne rain water for what is a relatively small 2 bed house. However, having conducted porosity tests on the clay it is apparent just how impermeable the ground around here is and that the run-off is a real problem. There would need to be a massive (dangerous) reservoir for holding the sort of volumes that site would receive. For the record I record rainfall for every day of the year and have done so since moving here. We have had several 30mm- 50mm in one day rainfall events in the last year and in some instances that arrive in a very short time (15mm in half an hour) How would the site cope with that? Imagine the sort of contamination from 270 houses with cars, pets and households who might be as cautious over the use of insecticides and pesticides.

Traffic
I have lived in Monmouth for about three years and have been intensely frustrated by the inadequate transport infrastructure especially around the route to the Dixton roundabout. I am a car driver, cyclist and keen walker. The road and roundabout is woefully inadequate for existing worse, the council refuse to maintain active travel at this end of the town. From the Vauxhall fields access to cycling along Dixton Road which is unsafe for adults and there is no way I would allow a child to cycle that way. Another 270+ cars adding to the congestion? The commensurate air pollution that goes along side this issue is apparently not being monitored, why not? How would that be addressed?

Environment and ANOB, I am sure many will have highlighted the inappropriate and damaging impact physically to the bats, wildlife and proximity to ANOB, however, why is this good agricultural land being targeted? The ground should remain as grassland / long-term leys and be used directly or indirectly for grassland. Livestock farming is the best way to capture carbon, improve soil condition and its ability to absorb more carbon because it adds to the organic matter. That also improves its capacity to hold water. Even the scientists that work for Natural Resource Wales have papers to support this but they feel it is not welcomed in the current political climate to publish or promote. Surly you should be considering the strategic advantage on avoiding good agricultural land given the geo-political environment we live under?

Decision making
I have moved from another rural town where the same developers have been prioritising the development of greenfield agricultural land as opposed to the more difficult brown-fields etc. They managed to fiddle an appeal due to a local council planning department making a clerical error. I wonder who is going to make sure that the planning process is going to listen to local concerns and give adequate time and weight to them, follow procedures and ensure they are robust and then ensure that no 'clerical' error occurs so that the developer circumnavigates the process if they don't like the result.

Why for example, the undue focus on this large site rather than the more obvious and appropriate Wonastow Road site which is apparently identified in the local plan as being a priority over this one. Is it because the

economies of scale to the developer make it commercially far more attractive than the alternatives rather than weighting the impacts?

I would also question why this process has become totemic of the political imperative to build anywhere it is deemed that local resistance is just nimby 'ism?

Thank you for reading this far, hopefully you are persuaded to make a rational critically-reasoned decision in favour of an alternative site.

[redacted]

3272

Alan Goldsbrough

Archived: 13 February 2025 07:32:44
From: [redacted]
Mail received time: Tue, 19 Nov 2024 13:56:24
Sent: Tue, 19 Nov 2024 13:56:07
To: MCC - PlanningPolicy
Subject: Opposition to RDLP Dixton Rd CS0270/HS4
Importance: Normal
Sensitivity: None

Dear Sirs

I wish to register my opposition to the proposed development of 270 houses on fields off Dixton Road. I fail to understand how this site can even be under consideration as it is a hugely sensitive site in terms of its landscape, ecological significance, history and traffic pinch points, particularly when other sites up for consideration eg., that at Wonastow Road (CS0274) do not pose these issues.

Just some of my reasons are:

Water Quality and Pollution

Drinking Water Contamination: The polluted River Wye, Monmouth's drinking water source, is in a Special Area of Conservation for Phosphates and has two warnings from the Drinking Water Inspectorate, including Cryptosporidium risk. Necessary treatment upgrades won't be complete until 2030 and will not benefit the houses on the proposed Dixton Road site.

Surface Run-off Pollution: Welsh Water extract Monmouth's Drinking Water 400 metres downstream (near the Rowing Club) which means rain runoff pollution would contaminate the River Wye about 400m upstream from Monmouth's drinking water intake.

Phosphate Pollution: Additional rainwater runoff would increase phosphate levels in the river, estimated to add 8 kg/year. Planned wastewater improvements won't reduce phosphates upstream. The upgrade to the Waste Water Treatment Works whilst removing about 90% of Phospates from sewage water **will only benefit the River Wye south of Monmouth not upstream**.

Whilst Site HS04/CS0270 is in the area failing Phosphate targets the alternative site CS0274 is not and therefore would be a more suitable choice.

Ineffectiveness of SuDS: The proposed drainage system (SuDS) is poorly suited for phosphate removal, particularly on the site's clay soil, which has impeded drainage and is often flooded as it was earlier this year. SuDS only have a 15-24% removal rate of Phosphates. SuDS will work better on free draining soils like that at the Wonastow site CS0274

Air Quality

Air Pollution: The area??s current NO?ü levels already exceed WHO guidelines. Extra cars will increase PM2.5 levels, which are not currently monitored. What isn??t measured cannot be improved therefore whilst NO2 levels are monitored (and I understand are already far in excess of the WHO guidelines) why do MCC not monitor the more dangerous PM2.5 and PM10 particulate levels, particularly given the proximity of the Dixton Road development to Monmouth Comprehensive School? The addition of 270 houses and over 400 vehicles will increase air pollution and estimated CO2 emissions would rise by 476 tonnes annually.

Traffic Congestion & Road Safety

Increased Traffic: The addition of 270 homes would bring 405 vehicles, causing up to 10 extra minutes of travel time during peak hours.

Road Safety: Hereford Road and Dixton Road pose a real safety hazard for pedestrians as the pavements are too narrow to cope with the current flow of people particularly around school times. This means some are forced to walk on the road and with 4490 vehicles a day currently travelling Dixton Road increasing the amount of motorists and pedestrians in this area is simply increasing the risk of accidents. Dixton Roundabout is already a pinch point which again additional motorists will exacerbate. The current congestion is dreadful with a simple journey to Wyesham or Mitchell Troy (less than a mile) often taking 20 – 30 minutes.

The proposed 'emergency exit' onto Hereford Road will create a 'rat run' with vehicles using this to avoid congestion on

Dixton Road leading to more congestion and increased road safety issues on Hereford Road, particularly for children at Haberdashers.
Active Travel Challenges: Residents will likely depend on cars, as cycling and pedestrian routes are distant (2km away) and challenging and Monmouth has no rail links and poor bus services. In comparison the Wonastow Road site CS0274 is on a national cycle route and is in walking distance to major job providers ie., Siltbusters, Mandarin Stone, Triwall & Singleton Court.

Protecting the Environment
Biodiversity: The Environment Wales Act (2016) places a legal duty on public authorities to seek to maintain and enhance biodiversity where it is within the proper exercise of their functions. In doing so, public authorities must seek to promote the resilience of
ecosystems. This means that MCC must take a pro-active approach to improve and not reduce biodiversity. How is destroying the feeding zone of the rare Great Horseshoe Bat, removing 20 football pitches of prime grazing land, ripping out established hedges, adding artificial light and interrupting bat commuting lines fulfilling this duty and giving a bio-diversity gain?
Proximity to Wye Valley AONB: The site lies close to this protected landscape, conflicting with policy that discourages major developments near such areas. Planning Policy Wales states: "Major developments should not take place in National Parks or AONBs except in exceptional circumstances." As the Dixton Road Site lies within the setting of the AONB and there are other options available which do not affect a protected landscape eg., Wonastow Road, why is the policy being ignored?
Landscape Sensitivity: The Monmouthshire LLCA identifies the site as highly sensitive, with other less sensitive areas recommended for development. Why has MCC not followed the recommendations of its own report?

The fact that MCC appear to be ignoring their legal duty, planning policy and recommendations of its own report make me extremely concerned that should this development on Dixton Road be approved then future expansion will be almost guaranteed.

I am also concerned about insufficient medical facilities, lack of school places, lack of well paid employment to afford the planned eco homes (even if some are so called affordable houses) and flood risk as this site regularly floods.

These are just some of the concerns that make me completely opposed to the proposed development of 270 houses on fields off Dixton Road particularly as there is an alternative site at Wonastow Road, Monmouth (CS0274) that offers both housing and employment facilities. It is within easy walking distance of major employers such as Siltbusters, Triwall, Singleton Court and Mandarin Stone. The soil is suitable for SuDS (free draining) and the site is downstream of where Monmouth takes its drinking water and will benefit from the upgrade to the water treatment plant in 2030. It is outside the Bat Zone and is less environmentally sensitive and is by a national cycle route.

I look forward to hearing from you.

[redacted]

3273

Lisa Wadley

From: [redacted]
Sent: 17 November 2024 14:50
To: MCC - PlanningPolicy
Subject: Comments on Monmouthshire Replacement Local Development Plan

To who it may concern

I would like to registered my objection to the employment site on the EA1j - Land to the West of Raglan

My reasons for rejecting this are detailed below:

The area has limited public transport - especially to the centre of Raglan. This is going to result in more cars being driven to the area. There are currently two bus stops on the outskirts of Raglan (Wilcae Bridge, Usk Road) which are infrequently used due to there being no paths to them for people to safely walk along to reach them. The council has also in the past year decided to stop maintaining the grass verges down to these stops which makes them look redundant and again not encouraging people to use them.

There is also frequent speeding along Usk road, which has been reported multiple times, [redacted] it is deemed to not be important enough for either an mobile speed camera or someone to investigate this further, even though there have been a number of near misses on this road frequently by cars and motorbikes speeding and overtaking unsafely.

There is also a lack of active travel route between Abergavenny and Raglan as well as Raglan and Usk, The main cycle route from Raglan to Usk and Raglan to Abergavenny is on dangerous 60mph/50mph roads one of which this development is going to be built next to.

Given the comments in the RDLP below:
19.1.5 - This should not, however, translate into traffic in settlements or favouring car transport where more sustainable, efficient and effective options can be made available.

I do no believe this industrial estate fits in with this comment without significant improvements to public transport and active travel routes and making these more safe.

This development is also highly unlikely to produce jobs for local people in Raglan due to the nature of these businesses being specialise and requiring specific skill sets, hence this is even more likely to result in people driving to the site rather than walking from their homes in the village.

My final reason for this objection is the damage to the local wildlife. As I am sure you are already aware due to government figures, there is a significant decline in bird species in the UK at the moment, especially those birds who live within farmland. This has been mainly down to habitat loss and this development, will once again result in habitat loss for a number of birds.

We also have seen over the past year Otters in the Nant-y-Wilcae and while this isn't directly alongside the development it is close enough for the development to have an impact.

Given the above comments, I would like to object this development and hope you consider the above comments before publishing your final plans.

[redacted]

3274

Justine Johnson

[redacted]

From: [redacted]
Sent: 17 November 2024 12:35
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: RLPD 2018-2033 Site HA4

Hello,

REF: 270 Houses on Fields off Dixton Road, Monmouth

I want to share my abject horror at the news that Monmouthshire County Council are seriously considering allowing this development. I watched the scrutiny meeting 7th November 2024 when three local people pleaded with you to reconsider. They spoke very knowledgably and should be given due consideration.

We are privalaged to live in an area of outstanding natural beauty. Tourists visit our town becasue of this and because of its amazing histotry yet your organisation seems hell bent on destroying it. We do not want blots on the landscape when there are other sites that are better such as along the Wonastow Road. We should be treating Monmouth like other beautiful locations and cherishing the countryside we have. Encouraging people to come because it is a destination of considerable value historically and charm, lets not trash it please!

On 19th November 2024 there is a march in London, echoing NFU's petition to save our farm land. This is a prime agricultural location, with the recent floods in Spain destroying 1000s of hectares of greenhouses growing vegetables, it is even more relevant to ensure we continue to grow our own food in Britain.

This to me is just like Beeching all over again.. short sighted vision for a ill thought out gain.

I would appreciate a response at your earliest convenience.

Yours faithfully,

[redacted]

3275

John Yapp

[redacted]

From: [redacted]
Sent: 16 November 2024 16:43
To: MCC - PlanningPolicy
Subject: Dixton Road 270 proposed houses!

Dear Planners at County Hall,

I am writing to express my strong concerns regarding the proposed development sites, particularly the choice of the Dixton Road site over the Wonastow Road site. After attending the recent meeting and reviewing the proposal, I firmly believe that the Wonastow Road site offers several clear advantages, especially when compared to Dixton Road.

First and foremost, the pollution levels in the River Wye are already a major issue, with high phosphate levels threatening water quality. The addition of 270 new homes above the area where our drinking water is extracted could exacerbate these concerns, especially given that water quality monitoring in the region seems to fall short as reported by residents & the Beacon newspaper.
The Wonastow Road site would be a far better location in this regard, helping to avoid further contamination by being down stream.

In addition, the Dixton Road site entrance is severely restricted, being located directly at the A40 Dixton roundabout, a notorious bottleneck that causes traffic jams at peak times. Introducing more vehicles to this already congested area is highly problematic. The Wonastow Road site would not only ease this traffic burden but also offer much better connectivity and access to the town.

Furthermore, the Dixton Road site is prone to flooding, particularly near the entrance, which would pose additional risks and challenges. The Wonastow Road site, by contrast, presents a much lower risk of flooding, making it a more stable and sustainable choice.

The Wonastow Road site is also better served by existing roads and has easier access to the town center. In comparison, the Dixton site would require residents to rely more on cars, adding to the already growing pressure on town parking. It's also a far less pedestrian- and cycle-friendly, with no dedicated cycle lane and steep terrain, which would discourage sustainable transport options.

Finally, the Dixton Road site is of much higher agricultural value, making it a more sensitive location for development. In addition, rare bat species in the area could be at risk from destruction. In contrast, the Wonastow Road site does not face these environmental concerns.

Given these points, I strongly believe that the Wonastow Road site is a far more sensible and viable option for new development in Monmouth. I know many local residents share my views, and we urge you to carefully consider the long-term implications of this decision for our town.

Monmouth is a wonderful place to live, and it is crucial that any development is carried out with the future wellbeing of the community in mind by our planners & council officers.

Thank you for your attention to this matter.

Kind regards,

[redacted]

3277

John Craig

Archived: 13 February 2025 07:35:44
From: [redacted]
Mail received time: Thu, 14 Nov 2024 13:44:28
Sent: Thu, 14 Nov 2024 13:44:16
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Planning Comment / Objection Re 270 Houses on fields off Dixton Road Monmouth
Importance: Normal
Sensitivity: None

Planning re preferred candidate site CS 0270 Dixton Leasbrook Monmouth)

I wish to respond re the proposed candidate site.

I understand that 3 candidate sites have been considered namely:

CS 0270(Dixton)

Wonastow (CS 0274)

Vauxhall Fields

I believe that Vauxhall Fields should be discounted given that it is prone to extreme flooding and is one of the very few open spaces that the public have access to in Monmouth.

Setting aside the additional question of how a small town can continue to absorb ever more additional housing without proper further infrastructure, planning should be about 'right houses in the right place'!

I comment as follows:

Re CS 0270 (Dixton) :

- Active Travel is promoted by Mon C C but local roads will be shared with 4000 vehicles per day
- Concerns over air pollution with possible additional 405 vehicles alone re new housing development. Present levels already above World Health Organisation guidelines. A proper and independent investigation needs to be undertaken. Traffic congestion will increase travel times by 5/10 minutes minimum
- Dixton would see a loss of prime agricultural land (the highest being Grade 3). Development should be on the lowest grade of land. (Grade 1)
- Dixton is the size of 20 football pitches, with huge loss of biodiversity. Implication for the Greater Horseshoe bats. A fully independent survey should be undertaken, not one organised by Mon CC
- Drinking water quality is already poor. 73 cases of people reporting to Welsh Water in 2021, the worst in a decade. 2 notices already served on Welsh Water regarding levels of quality
- Dixton is not free draining. Incorporation of a pond under SUDS will only cure 15/24% of run off pollution. Survey points to run off doubling with the proposed new houses
- Dixton is too close to AONB and similarly re local historical sites
- Landscape Sensitivity. Mon C C's own report shows concerns over flood issues
- No playground provision in new site
- Very limited job opportunities in Monmouth, not many as indicated by Mon C C .

- Inceased traffic on a squeezed site will potentially cause safety issues to pedestrians etc.

- **Candidate Site Wonastow (CS 0274) is far more suitable:**
- It is has minimal flood risk
- It already has ‘access’ points
- Near to the only two main Monmouth employers - Mandarin Stone and Siltbusters
- New house residents can walk to work (Active Travel)

Perhaps more fundamentally Monmouth does **NOT** have large scale employers.

It follows that any additional housing will add to Monmouth’s present situation of being an employment commuter town for Newport, Cardiff, Bristol etc.

What should happen in my opinion is the creation of completely new settlement in Monmouthshire with **adequate** infrastructure.

Thank you for reading

Please ack safe receipt

[redacted]

3278

Miss Susan Griffiths

Archived: 17 February 2025 17:25:57
From: [redacted]
Mail received time: Tue, 12 Nov 2024 11:51:07
Sent: Tue, 12 Nov 2024 11:51:02
To: MCC - PlanningPolicy
Subject: Proposed development of 770 houses at Crick Road, Portskewett
Importance: Normal
Sensitivity: None

I write to express my opinion in respect of the above mentioned proposal. To build this amount of property at this location is totally unacceptable. This area is an attractive green belt area where the environment and wildlife should be respected and protected as it borders the wonderful country park area next to Caldicot Castle. There is a distinct lack of road infrastructure (infact the part of Crick Road adjoining the Elderwood Parc development is in a very poor state of repair requiring urgent attention), inadequate 1960's style shopping facilities in nearby Caldicot, schools and GP surgeries are already at capacity therefore a totally unsuitable site to erect so many new homes. If this goes ahead it will completely ruin the lovely village feel that Portskewett currently provides.
I feel strongly that Monmouthshire County Council should consider other alternative areas.

[redacted]

View results

Respondent

115 Anonymous

08:53
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

[redacted]

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- [x] Yes
- [ ] No

9. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed. *

THE PROPOSED DEVELOPMENT OF 770 HOUSES OFF CRICK ROAD IN PORTSKEWETT

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

11. Would you like to comment on this question *

- [x] Yes
- [ ] No

12. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

13. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed. *

NOT TO HAPPEN AT ALL

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

14. Would you like to comment on this question *

- (●) Yes
- ( ) No

15. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

16. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed.
    *

BUILDING OF 770 HOUSES OFF CRICK ROAD, PORTSKEWETT

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

17. Would you like to comment on this question *

- ( ) Yes
- (●) No

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

18. Would you like to comment on this question *

- ( ) Yes
- (●) No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

19. Would you like to comment on this question *

- ( ) Yes
- (●) No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

20. Would you like to comment on this question *

- (●) Yes
- ( ) No

21. Is your representation in support or objection? *

- (●) Support
- ( ) Objection

22. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

23. Would you like to comment on this question *

- (●) Yes
- ( ) No

24. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

25. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

770 HOUSE PROPOSED DEVELOPMENT IN PORTSKEWETT

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

26. Would you like to comment on this question *

- (●) Yes
- ( ) No

27. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

28. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

[redacted]

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

29. Would you like to comment on this question *

- (●) Yes
- ( ) No

30. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

31. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

NOT TO HAPPEN AT ALL!!!

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

32. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

33. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

34. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

35. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

36. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

37. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

38. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

39. Would you like to comment on this question *

- ( ) Yes
- (•) No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

40. Do you consider that the Plan is sound? *

- ( ) Yes
- (•) No

41. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? *

- [ ] Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- [x] Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- [x] Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- [x] Fails Test 3: Will the Plan deliver (is it likely to be effective)?

42. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): *

THE PLAN FOR 770 HOUSES IS TOTALLY CRAZY. WHAT ABOUT SCHOOLS, DECENT SHOPS, GP SURGERIES?

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

43. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- ( ) Yes
- (•) No

Part 5: Welsh Language

44. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

45. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

re you
haracter-

3279

Dr Sian E Rees

View results

Respondent

116 Anonymous

08:17
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

NA

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

9. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

10. Would you like to comment on this question *

- (•) Yes
- ( ) No

11. Is your representation in support or objection? *

- ( ) Support
- (•) Objection

12. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed. *

Issued as separate document

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

13. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

16. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

17. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

18. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

19. Would you like to comment on this question *

- ◉ Yes
- ○ No

20. Is your representation in support or objection? *

- ○ Support
- ◉ Objection

21. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed. *

    Comments sent in separate document

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

22. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

23. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

25. Would you like to comment on this question *

- ◉ Yes
- ○ No

26. Is your representation in support or objection? *

- ◉ Support
- ○ Objection

27. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Comments in separate document

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

28. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

29. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

30. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

31. Would you like to comment on this question *

- [x] Yes
- [ ] No

32. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

33. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.
*

Comments in separate document

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

34. Do you consider that the Plan is sound? *

- [x] Yes
- [ ] No

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

35. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- [x] Yes
- [ ] No

36. If you wish to speak at a hearing session which language would you wish to use?

- ○ Welsh
- ◉ English

Part 5: Welsh Language

37. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

38. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

3280

Colin Scott

Archived: 07 March 2025 17:12:44
From:
Mail received time: Tue, 12 Nov 2024 10:46:55
Sent: Tue, 12 Nov 2024 10:46:49
To: MCC - PlanningPolicy
Subject: FOR THE ATTENTION OF: PLANNING POLICY - EAST OF CALDICOT/NORTH OF PORTSKEWETT
Importance: Normal
Sensitivity: None

I am sure you will hear many arguments against this development from many people living in the Caldicot and Chepstow area so I will not go down that route but instead will refer to existing policy documents and your own Local Development Plan.

You say that your plan is supported by 'The Future Wales Policy 3'

Did you not read this on page 60 of the document?

"Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas. Developing our urban areas to enhance their performance will be challenging, but we firmly believe it is the right ambition for Wales and supports the Welsh Government's commitment to social justice.

Choosing to develop new towns or enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources"

And on page 161

"A Strategic Development Plan should focus on the movement of people across the region and support an integrated approach to strategic land-use and transport planning. Key locational decisions, including for employment centres, strategic housing growth and services, should focus on the most sustainable and accessible locations, address congestion, reduce car-based commuting and improve air quality"

You can argue that you are following these guidelines but these houses will be bought by people travelling to Newport, Bristol and Cardiff for work (as local transport services are inadequate) which does not reduce car-based commuting and will not improve air quality - so directly contravening 'The Future Wales Policy 3'

Referring to your document - 'Replacement Local Development Plan 2018-2033'
Again, you are directly contravening your own Development Plan Summary which states on page 4 that we have an issue with "a high level of out-commuting in the county" and "there is a need to tackle climate change, carbon production and pollution"

In summary, Mon CC does not have carte blanche to develop on greenfield sites and you are lying to the public by saying that you are supporting 'The Future Wales Policy 3'

If at the end of the consultation period, the views that are expressed by the public are ignored (as they have been for other developments in our area) then we will completely lose faith in the system and specifically Mon CC and this will go to prove that you are being driven by large housing development companies and not the people you represent.

I welcome any response from you

[redacted]

3281

Sophie Powell and Sam Hooper

From: [redacted]
Mail received time: Mon, 11 Nov 2024 12:26:45
Sent: Mon, 11 Nov 2024 12:26:24
To: MCC - PlanningPolicy
Subject: OBJECTION to 770 New Homes
Importance: Normal
Sensitivity: None
Archived: 13 February 2025 07:42:27

To Whom it May Concern,

Me and my partner would like to object to the plans for a mass development of 770 homes in Caldicot/ Portskewett. We are first time buyers who saved really hard to be able to buy a home in Portskewett because of the country feel this small area has to offer. The green spaces around the local area are beautiful and massively beneficial to mental health! This area is quiet and beautiful and has the perfect balance between rural and developed. The new 770 houses would completely DESTROY this balance. We brought our house here because of the natural beauty and peacefulness, our new house felt instantly like a home due to the area and current structure. Yet, the thought of a mass development really distresses us … Caldicot does not have the landscape to cope with an increased population given all the country lanes and single roads. Chepstow can be a complete bottle neck which usually results in traffic collisions. Given an increased population will ONLY RESULT in chaos. Please, DO NOT ruin a perfectly balanced rural/ developed village where the population is currently thriving and happy. Please, DO NOT build of beautiful landscapes that aid in keeping this small village a relaxing and beautiful place to live. Please, DO NOT DESTROY a village with exceptional community spirt and togetherness.

It is unacceptable to over populate a small and beautiful village in Wales! The area WIlL simple not cope with the shear number of people.

Thank you

[redacted]

3284

Mr Allen Smith

View results

Respondent

66 Anonymous

53:03
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- [x] Yes
- [ ] No

9. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed.
    *

Land at Mounton Road Chepstow.
The reasons for my objection are that I do not believe that the following has truly been taken into consideration:-
1. The volume of morning traffic conversing on the Highbeech roundabout from A48 from Gloucester, A48 from Caldicot & Rogiet & the A466 from Monmouth the immediate effect on our property is pollution. The traffic build up starts before 7am and is practically stationary right through to beyond 9am. This is repeated in the opposite direction from 3.30pm until 7pm.
This is normal for most weekdays however, should there be any issues on the M48 or link road the impact on Chepstow is vast. and there is also events at Chepstow Race course to be taken into account
This has been raised with the Synod Transport Minister by the previous secretary of State for Wales where it was accepted that this is a major issue and required major infrastructure changes, which has not been identified within the development plan.
2. The volume of housing developments along the A48 in Gloucester (which runs into thousands) is having a major impact on the volume of traffic and pollution in Chepstow which far outstrips any development plan by Monmouthshire County Council in Chepstow. This volume of traffic from Gloucester is also having a major impact on the condition of the roads which Monmouth County Council are responsible for.
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4. There is no identification within the development plan to include additional schools, Doctors or Dentist Surgery's which is currently insufficient following the more recent developments in Chepstow.
5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

11. Would you like to comment on this question *

- [x] Yes
- [ ] No

12. Is your representation in support or objection? *

- [ ] Support
- [x] Objection

13. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

14. Would you like to comment on this question *

- (●) Yes
- ( ) No

15. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

16. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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lease see previous statement

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

17. Would you like to comment on this question *

- (●) Yes
- ( ) No

18. Is your representation in support or objection? *

- ( ) Support
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Please see previous statement

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

20. Would you like to comment on this question *

- (●) Yes
- ( ) No

21. Is your representation in support or objection? *

- ( ) Support
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23. Would you like to comment on this question *

- (●) Yes
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- (●) Yes
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29. Would you like to comment on this question *

- (●) Yes
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32. Would you like to comment on this question *

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Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

35. Would you like to comment on this question *

- (●) Yes
- ( ) No

36. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

37. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

Land at Mounton Road Chepstow.
The reasons for my objection are that I do not believe that the following has truly been taken into consideration:-
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This has been raised with the Synod Transport Minister by the previous secretary of State for Wales where it was accepted that this is a major issue and required major infrastructure changes, which has not been identified within the development plan.
2. The volume of housing developments along the A48 in Gloucester (which runs into thousands) is having a major impact on the volume of traffic and pollution in Chepstow which far outstrips any development plan by Monmouthshire County Council in Chepstow. This volume of traffic from Gloucester is also having a major impact on the condition of the roads which Monmouth County Council are responsible for.
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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

38. Would you like to comment on this question *

- (●) Yes
- ( ) No

39. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

40. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

41. Would you like to comment on this question *

- (●) Yes
- ( ) No

42. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

43. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

44. Would you like to comment on this question *

- (●) Yes
- ( ) No

45. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

46. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

47. Would you like to comment on this question *

- (●) Yes
- ( ) No

48. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

49. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

50. Would you like to comment on this question *

- (●) Yes
- ( ) No

51. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

52. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

53. Would you like to comment on this question *

- (●) Yes
- ( ) No

54. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

55. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

56. Would you like to comment on this question *

- (●) Yes
- ( ) No

57. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

58. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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5. In conclusion I believe that until Monmouth County Council address the infrastructure issues and the increase volume of traffic from Gloucestershire that no further housing developments be undertaken. And finally I'm very disappointed that further greenfield sites are being destroyed for future generations.

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

59. Would you like to comment on this question *

- (●) Yes
- ( ) No

60. Is your representation in support or objection? *

- ( ) Support
- (●) Objection

61. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

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Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

62. Do you consider that the Plan is sound? *

- ○ Yes
- ◉ No

63. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? *

- ☐ Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- ☐ Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- ☑ Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- ☑ Fails Test 3: Will the Plan deliver (is it likely to be effective)?

64. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): *

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Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

65. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- ○ Yes
- ◉ No

Part 5: Welsh Language

66. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

67. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

[redacted]

3287

Robert Elliott

From: [redacted]
Mail received time: Wed, 20 Nov 2024 09:51:33
Sent: Wed, 20 Nov 2024 09:51:26
To: MCC - PlanningPolicy
Subject: Site CS0270 HA4 _Dixton Road
Importance: Normal
Sensitivity: None
Archived: 13 February 2025 07:47:36

Hello ,
I would like to raise some points against the proposal to build 270 houses at the lower end of Dixton Road, Monmouth, CSO270.
This development is on Green Fields which are an important food source for local Rare Horseshoe Bats. In addition the dirty rainwater run off is likely to overwhelm the proposed holding system so it reaches the already vulnerable River Wye above the extraction point for Monmouth's drinking water.
As the site is not really within easy walking distance of shops etc. the extra Traffic will add to the already congested road system. Idling at the Traffic Lights at the top of Dixton Road will increase the air pollution for the residents and school children who walk that way between locations. Car Parking in Town is already difficult.
As this site is not bounded on two sides it's likely to be expanded further which will adversely increase the above impact on the local area.
The other proposed site - CS0274- will not have such a bearing on these issues and should therefore be favoured over CS0270.

On a more General point, what are the plans for additional Services and Infrastructure to support further increases in the area's population and will these be implemented before the extra housing is built?

[redacted]

Sent from my iPad

3288

Janet Wall

Archived: 13 February 2025 07:49:37
From: [redacted]
Sent: Tue, 26 Nov 2024 09:39:23
To: MCC - PlanningPolicy
Subject: Fw: Dixon Road housing objection
Importance: Normal
Sensitivity: None

From: [redacted]
Sent: 25 November 2024 09:08
To: planningpolicy@monmouthshire.gov.co.uk <planningpolicy@monmouthshire.gov.co.uk>
Subject: Dixon Road housing objection

I strongly object to the idea of putting a housing estate at the end of Dixon Road for a few reasons. Firstly it has an endangered horseshoe bat colony that fly over the site to feed, the pollution levels in that area are already above the permitted levels, especially car fumes that have been linked to asthma. Adding more cars to an already congested route . The water run off from the site would make our drinking water problems worse . It will spoil the view on entering Monmouth, and once agricultural land is concreted over it is lost forever. There must be other sites available that will not impact on our health , on our beautiful town, and a protected bat species . Once agricultural land is concreted over it is lost forever.

[redacted]

3290

C Reynolds

[redacted]

22nd November 2024

To whom it may concern.

I am writing to express my concern over the proposed housing development on Dixton Road (HA4 land at Leasebrook)

The Planning Department seems to have chosen to ignore many basic factors in choosing this site.

It appears the development is too close to the protected AONB area, also, there are concerns for the Greater Horseshoe bats which are found at Newton Court. It is also prime agricultural land, so why has this been allowed? The Wonastow site has none of these factors.

The site is the size of 20 football pitches and a recent survey has shown that water run-off will double with the number of houses being built. I walk down the Dixton Road regularly and after rain there is always standing water at the bottom of that field as well as large puddles and surface water on the road.
The Wonastow site is acceptable regarding flooding issues.

Where will the surface water from this site drain to? The River Wye of course, and upstream from our water treatment

works which is where our drinking water is taken from. Over recent years there have been many complaints about water quality and concerns regarding cryptosporidium which is being caused by run-off. Surely this development will make matters worse for all the inhabitants of Monmouth and their good health. Safe drinking water is a basic requirement for all.
There would not be this issue with the Wonastow site.

I have concerns for the health of families on the site regarding levels of pollution from the busy Dixton roundabout. Has a study been undertaken to measure those levels? With the possibility of up to 400 cars being owned by the residents of 270 houses this will further impact on air quality, not only for them but residents of Dixton Road, Dixton Close and the children at Monmouth Comprehensive School.
This will not be a problem at the Wonastow site.

The Dixton Road is severely congested in the morning and evening with school buses and cars driving to and from work and school. How on earth will cars from the development safely join the traffic at those peak times?

This won't be an issue with the Wonastow site.

Regarding Active Travel - there is no infrastructure planned for this but I understand a right of way is being suggested through the hedge at the bottom of Dixton Close.

[redacted]

the hedge was there when I moved in. Has anyone considered The Hedgerow Protection Act?
Would parking increase in Dixton Close because of the difficulty in joing traffic on Dixton Road? Parking is already an issue at the closer end of Dixton Close.
This would not be a problem on the Wonastow site.

The Wonastow site already has access points onto a Minor road. It is near to 2 major employes and pedestrians have a safe place to walk. The pavement along Dixton Road is narrow and alongside a busy road. I would be worried for the safety of children and parents walking to school and work.
The Wonastow site is safer.

Additional housing is needed in Monmouth but already the doctors surgeries and schools are struggling with over subscription. There just isn't the infrastructure to support such a large development

Thank you for reading this letter and I

[redacted] Made.

3291

David Evans

PROPOSED HOUSING DEVELOPMENT AT DIXTON ROAD

For the attention of Monmouthshire County Council Planning Dept.

As I write this, Monmouth is once again beleaguered by flooding and I am watching vehicles carefully negotiating their way through water on the Dixton Road, at what would be the entrance to the proposed development. This comes as no surprise, given that flooding at both ends of town is becoming a frequent event during heavy rainstorms, and likely to increase with climate change.

I believe the problems at the far end of Dixton Road have already been flagged up by the Environment Agency and there are so many factors that demonstrate the unsuitability of this land for a large housing development that it is hard to know where to begin.

Perhaps most obvious is the potential impact on the roundabout and the commensurate tailbacks towards Monmouth town. An increase in private vehicles seems inevitable because of the number of people who will be obliged to travel to their place of work. There is little prospect of any significant growth in job opportunities in Monmouth, so the result will be a sizeable daily outward migration. Not only will this put an added burden on our road system, it will also impact the environment and conflict with Monmouthshire's aspiration to improve its green credentials.

Pollution of the atmosphere is also of concern, especially since the Comprehensive School sits between the Dixton Road and the dual carriageway: the emissions from idling vehicles can only present a health hazard during peak periods when children are making their way to school and, indeed, on residents in the area.

It has been well documented that there are unacceptably high phosphate levels in the Wye, from which the town gets its water supply, and the run-off from another 270 houses will further exacerbate that problem.

The difficulties posed by Monmouth's topography have been highlighted by the works programme carried out by Dwr Cymru Welsh Water over the last 12 months. Traffic snarl-ups have created serious delays in deliveries, public and school transport timetables, and appointments, all of which have had a drastic affect on business and probably health and well-being. But at least we were aware of the schedule and when it would end. Permanent housing expansion can only create additional permanent hardships and hazards for pedestrians, cyclists and motorists alike. Monmouth's infrastructure is already creaking. and the siting of this development could tip it into complete collapse.

I am not one of those people opposed to the building of new homes; I fully recognise that nationally there is a growing and desperate housing shortage. However, I believe there are better locations – certainly within the county and possibly in our town. I understand that the Authority has considered expansion of development at Wonastow Road and, whilst not ideal given the flooding experienced there over this last weekend, it would appear more suitable than the Dixton Road. The Dixton fields have long been

given over to grazing and therefore have considerable agricultural value, whereas, so far as I am aware, no such activity has been present at Wonastow Road in recent times.

Along with many others, I urge MCC to consider all the ramifications before reaching a decision that will have far-reaching and long-term impact on the quality of life and commercial future of our town.

I therefore oppose the proposed development at Dixton Road.

[redacted]

3292

Georgina Holman

[redacted]

Date: 11/11/24

Dear Monmouthshire Council,

Subject: Objection to the Replacement Local Development Plan 2018-2033 in Portskewett

To whomever it may concern,

I am writing to formally object to the proposed development of a school and housing complex next to my property. While I understand the need for community development, I have several significant concerns regarding the potential impact of this project on my property, quality of life, and the surrounding area. Below are the reasons for my objection.

1. **Increased Traffic and Safety Concerns**
   One of my primary concerns is the expected increase in traffic in the area. A school, combined with new housing, will undoubtedly lead to a significant rise in the number of vehicles on already congested roads. This could result in safety risks, especially for pedestrians, children, and other residents. I fear that the increased traffic will exacerbate existing problems such as noise and air pollution and could also make the area more hazardous for pedestrians, particularly around school drop-off and pick-up times. Crick Road is not built for mass traffic day in day out, and I fear this will cause a mass back up of cars, especially by the David Broome Centre which is along this road and holds events quite frequently. The B4245 is a 60-mph road and having young children living right next to/going to school here could be extremely dangerous and end in fatalities.

2. **Loss of Privacy and Security**
   The proximity of the proposed new housing units to my property will directly impact our privacy and security. With homes being built so close to our property, we will no longer enjoy the quiet and privacy that we as a family currently value. The potential for overlooking my property, as well as the increased foot traffic and potential for trespassing, raises concerns about my personal security. Our home has huge windows which were put in by the previous owners to be able to enjoy the wonderful scenery around our home, from upstairs and downstairs, which is something we all massively enjoy seeing. But with this proposed plan, we now feel we will have no more privacy, and what was once a great feature, will have to be covered with blinds so we don't have people staring into our home! People will be able to see into our garden as well and we won't have an ounce of privacy if this plan goes ahead.

3. **Environmental Impact**
   This development will undoubtedly lead to the destruction of green space and wildlife habitats. There is also the issue of increased runoff from the construction, which could affect local drainage and lead to flooding in the surrounding area. The noise and air pollution during construction could further degrade the natural environment, which I value as part of the community's character. What happened to the plan of a greener country? In 30 years' time, what will Portskewett look like? This place is unique, and the residents do not want to see it become a copycat of every other city in the UK, Full of houses and buildings, a horrible sight to see and not something that promotes better mental health and well-being.

4. **Quality of Life and Community Impact**
   While the development of new housing and a school may increase the local population, it is essential to consider whether the existing infrastructure can adequately support this growth. Our community already faces challenges in terms of access to essential services, such as shops and healthcare facilities. It is virtually impossible to see an NHS dentist and going private is not always an option for people as it is costly, which then in turn will lead to health problems. More shops will need to be built as well as more parking spaces for people to access all these services if you go ahead with this plan!!! Something that the people of Portskewett do not want, as again we will be destroying our green areas for this.

   Another thing to consider is public transport. There is no pavement that goes from Crick Road down to the bus stop near the castle. This is extremely dangerous to walk on the side of a 60 MPH road, especially in cold or dark weather. The buses do not run frequently enough for people that don't drive and are trying to get into work. There is also no service such as Uber for people to get around, and taxis are quite rare and can be costly.

   The addition of hundreds of new residents could place an undue strain on already limited resources, making it more difficult for current and future residents to access basic necessities. Without the necessary investment in local infrastructure, the development risks overburdening existing services and reducing the overall quality of life for everyone in the area. I strongly urge that these needs be addressed as part of any planning considerations, so that the development does not negatively impact the community's ability to access the services it needs. Please think of the town and what the people in it need, [redacted]

5. **Property Value**
   The potential decrease in property values because of this development is another concern. The close proximity of a school and new housing units could make the area less desirable for current and future homeowners. The loss of green space and increased noise and traffic will reduce the overall appeal of the neighbourhood.

   There are already a few houses up for sale down Crick Road which are absolutely stunning but are not selling due to this proposed plan! Can you not see you are pushing people out of the area?? The village belongs to its beloved residents, and you are making us all consider

leaving our homes and our wonderful life here. Somewhere that we want to call home for the rest of our lives, but I'm not sure if that's something we want any more if this is going to go ahead.

6. **Impact on Local Livestock and Farming Operations**

Additionally, I am concerned about the potential disruption to local farming activities, particularly regarding livestock and agricultural operations. The increased development of residential properties and the establishment of a school in close proximity could create conflicts with established farming practices. Livestock can be sensitive to noise, traffic, and changes in their environment, and the development could lead to stress or disruptions in their daily routines. Farmers may also face challenges with managing their animals and crops due to increased human activity and potential limitations on their operations. The introduction of new residents and schools may lead to complaints about typical farm-related activities, such as the noise from farm machinery or the smell from manure, potentially harming the livelihoods of local farmers who have long maintained these lands. What happened to backing farmers?? They use these fields day in day out and look after them exceptionally well, and now you're taking the land away from them! Once again, you will be pushing people out of the area. Farmers supply us with food and milk which we all need to live, and we need to support them!

I urge the planning authorities to consider the impacts on the agricultural community and the need to preserve local farming operations, which are an important part of the area's heritage and economy.

7. **Personal Impact of this development**

[redacted] specifically for its peaceful, rural environment, which is crucial for health and well-being, particularly in retirement for my mum and stepdad. The tranquillity and natural surroundings are vital to maintaining my physical and mental health, and the absence of high levels of noise, traffic, and development was a key factor in our decision to settle here. The proposed development, with its potential for increased noise, traffic, and loss of green space, would significantly alter the very quality of life that drew us here in the first place. As my parents who will be retirees very shortly, they rely on this calm environment for their daily routines and leisure, and the prospect of living next to a busy school and new housing development would directly impact their ability to enjoy a peaceful and healthy retirement. This is not just a matter of personal preference; it is essential for our continued well-being, and I fear that the proposed changes would compromise the lifestyle we envisioned when moving to this area. The home we have built here was supposed to be my Mum and Stepdads retirement home, somewhere they can enjoy for the rest of their lives in peace and quiet, away from the hustle and bustle of everyday life.

We moved from a housing estate to be able to enjoy privacy and the beautiful nature surrounding our home, and now you are wanting to put us right back where we used to live, surrounded by houses and constant construction. Portskewett is a place of beauty and to ruin it by building houses on mass is so disappointing to hear. We should be keeping these places green and full of the beautiful nature that it holds. Soon, this village will be just like every other one, full of houses everywhere you look, and the residents of Portskewett do not

want this!! All of us who occupy Portskewett want a quiet life, enjoying the local amenities and the slower pace here.

Furthermore, as someone who works for the NHS and is required to work from home often, my role requires a quiet and focused environment to effectively carry out my responsibilities. The construction of houses near my property would significantly disrupt my ability to concentrate, particularly during the hours I need to be available for work. Given the nature of my job, the constant noise will interfere with important calls, meetings, tasks and ultimately affect my ability to perform my duties to the best of my ability.

Finally, THIS PLAN IS PURE GREED AND YOU ARE NOT THINKING OF THE RESIDENTS AT ALL HERE!! Portskewett is a quiet village, and this is why my family, and many others chose to live here, why are you trying to cram us all in together like sardines?!!! Please think of the people who have built their life here, and also whether this is something you would accept, as I'm sure you would not like to live on a construction site for years on end! As humans, we need to be in nature and enjoy what it has to offer, not tear it all down and have no room to breathe because you have ruined it all and want to build houses so close together for maximum profit. All this shows is you do not care for the residents of Portskewett.

In light of these concerns, I respectfully request that the planning authorities carefully reconsider the proposed development. I urge you to consider alternative locations that would better suit the needs of the community while minimizing the negative impact on existing residents.

Thank you for your attention to this matter. I trust that my objections will be given full consideration, and I look forward to your response.

[redacted]

3293

J Wall

[redacted]

To the RLDP consultation

Re. Dixon Road Housing

I strongly object to the proposed housing estate at Dixon Road. Any Runoff of any waste water will only make the problem of our sewerking water worse. It is already an area of high polluted air, mostly car fumes and any added traffic will make this worse, and car fumes have already been linked to asthma. It is the gateway to Monmouth and an area of ONB, it is using agricultural land that bats fly over and feed in, and they are protected. I know we need houses but this is not in my opinion where they should be built. Our health and wellbeing is more important, so please dont make a bad situation of air and water pollution worse.

Yours [redacted]

3294

Jed Knight

[redacted]

Date: 13th November 2024

Dear Monmouthshire Council

Subject: Objection to the Replacement Local Development Plan 2018-2033 in Portskewett

I am writing to formally **OBJECT** to the proposed development of a primary school and a housing estate on the borders of Caldicot and Portskewett. I have several significant concerns regarding the potential impact of this project on the local infrastructure and environment.

I am listing below the reasons for my OBJECTION.

Increased Traffic and Safety Concerns
One main concerns is the increase in traffic in the area. A primary school, combined with a new housing estate, will undoubtedly lead to a significant rise in the number of vehicles on our already congested roads. This then starts to affect other local villages.

This could result in safety risks, especially for pedestrians, children, and other residents. I fear that the increased traffic will exacerbate existing problems such as noise and air pollution and could also make the area more hazardous for pedestrians, particularly around school drop-off and pick-up times. Presumably in the proposed school you have factored in a very large car park for parents to park at drop off and pick up times, as they cannot park on Crick Road? Anyone parking on Crick Road could be endangering lives of other drivers, children, parents and themselves. This is a very fast road, this is used by all sizes of vehicles, night and day.

Loss of Privacy and Security
The proximity of the proposed new housing estate to my property will directly impact our privacy and security. The school could potentially be looking straight into our home, upstairs and downstairs, as we are on higher ground. With homes being built so close to our property, we will no longer enjoy the quiet and privacy that we as a family currently value. The potential for overlooking my property, as well as the increased foot traffic and potential for trespassing, raises concerns about my family's safety and security. But this also means we will be able to see into the school, surely this is a security issue for them as well. The lane that you have proposed as an entrance to part of the site, has been used by this house for around 40 years, this is our access to our back gate. Our stop tap is also located in the field next door! We need to have access to this at all times.

Environmental Impact
This development will undoubtedly lead to the destruction of green space, plants and wildlife habitats. There is also the issue of increased runoff from the construction, which could affect local drainage and lead to flooding in the surrounding area. I have seen photos of flooding in this area that happened in the past. The noise and air pollution produced during construction will further degrade the natural environment. What happened to the plan of a greener country?

In 30 years, what will Portskewett, Caldicot and The Gwent Levels look like – JUST ANOTHER HOUSING ESTATE. This place is unique, and the residents do not want to see it become like every other city in the UK.

Quality of Life and Community Impact
While the development of new housing and a school may increase the local population, it is essential to consider whether the existing infrastructure can adequately support this growth. Our community already faces challenges in terms of access to essential services, such as shops and healthcare facilities. It is virtually impossible to see an NHS

dentist and going private is not always an option for people as it is costly, which then in turn will lead to health problems. More shops will need to be built as well as more parking spaces for people to access all these services before this plan can go ahead. **You have already added to the strain on this beautiful village by adding Subrook and also Elderwood Parc (which is currently not finished).**

Another thing to consider is public transport. There is no pavement that goes from Crick Road down to the bus stop near the castle. This is extremely dangerous to walk on the side of a 60 MPH road, especially in cold or dark weather. There is also no pavement the other side of Crick Road – going to the only shop in Portskewett – this is also a fast narrow DANGEROUS lane, that I myself would not currently use.

I am not currently aware of any buses going along the B4245 – they go through the village of Portskewett. For those people who do not own second cars – how are they supposed to get around if there is no public transport? There is no Uber or Uber type services over here. There is limited Taxi's in the local area – but this can be very costly for parents on low incomes.

Property Value
The potential decrease in property values because of this development is another concern. The proximity of a school and new housing units could make the area less desirable for current and put off future homeowners. The loss of green space and increased noise and traffic will reduce the overall appeal of the neighbourhood.

There are already a few houses up for sale down Crick Road which are absolutely stunning but are not selling due to this proposed plan – they are having to drop their prices and yet still cannot sell! This proposal is pushing current residents out of this area. It will also stop tourists from coming to this area – who wants to see another HOUSING ESTATE!

Impact on Local Livestock and Farming Operations
I am concerned about the potential disruption to local farming activities, particularly regarding livestock and agricultural operations. These fields are currently being used for generations of farmers. You are pushing them out of their jobs. We should be supporting local farmers – they supply us with food and milk. We will end up sourcing this from abroad! I urge the planning authorities to consider the impacts on the agricultural community and the need to preserve local farming operations, which are an important part of the area's heritage and economy.
This is not ensuring MORE LOCAL JOBS.
Along with the closure of the David Broome Equestrian Centre – **you are causing job loses for local people. The industrial area you are planning – does not make up for this.**

I respectfully request that the planning authorities carefully reconsider the proposed development. I urge you to consider alternative locations that would better suit the needs of the community while minimizing the negative impact on existing residents and the environment.

I trust that my objections will be given full consideration, and I look forward to your response.

[redacted]

3295

Jo Thorp

[redacted]

Ref: 270 Houses on Fields off Dixton Road, Monmouth

RLDP 2018-2033

Site HA4

Dear Sir/Madam,

I am writing in response to the Public Consultation on the Deposit Plan regarding the above site.

I walk in these fields several times a week, all year around and our property looks down across them. The 'emergency vehicle access' is [redacted] If this development goes ahead it will have a huge, direct impact upon our daily lives, as individuals as well as members of the community, however it is the wider issues that concern me primarily.

As with any development of this size I know that residents are extremely concerned about the impact upon services such as doctors, dentists and schools which are already stretched and in some cases over capacity. The site also offers very few local job opportunities that could be accessed via active travel.

Traffic congestion is a major concern. The addition of 270 homes on this site would lead inevitably to increased traffic, bringing in, in all likelihood, over 400 vehicles, increasing travel time during peak hours in a location where traffic congestion is already an issue. CO_2 emissions would consequently rise, increasing overall levels of air pollution.

Residents will likely depend on cars, as cycling and pedestrian routes are not safe or pleasant. Active travel from the site would be difficult and unsafe, being very close to the dual carriageway or along an already busy road into the town's schools and shopping area.

A further major concern in considering this site is the impact upon **quality of drinking water and pollution in the river Wye**. The river Wye, Monmouth's drinking water source, has two recent warnings from the Drinking Water Inspectorate, including Cryptosporidium risk. Necessary treatment upgrades won't be complete until 2030. The area cannot cope with an additional 270 households.

Rain runoff pollution would contaminate the river Wye upstream from Monmouth's drinking water intake negatively impacting residents downstream due to increased phosphate pollution. Planned wastewater improvements won't reduce phosphates upstream where this site is located. The proposed drainage system (SuDS) is poorly suited for phosphate removal, particularly on the site's clay soil, which has impeded drainage. I encounter flooding at the bottom of the site on a very regular basis throughout the winter and the sites clay soil is evident in the colour of the floodwater.

The site is also extremely **environmentally sensitive**. It is within the sustenance zone for endangered Greater Horseshoe Bats, which rely on grazing land and hedgerows. This has proved a major issue in relation to the recent repairs to the landslip on the dual carriageway and so must be a serious consideration in this application. The site also lies close to the protected landscape of the Wye Valley AONB, going against policy that discourages major developments near such areas. The site, visible from the historic Dixton Mound, has a high historical landscape sensitivity. The site includes prime agricultural land, which should be conserved per planning laws. The alternative Wonastow Road site has lower-grade land and should have been chosen instead. The Monmouthshire LLCA identifies the site as highly sensitive, with other less sensitive areas recommended for development. About 15% of the site is prone to flooding, potentially hindering emergency access, whereas the Wonastow site has minimal flood risk.

Alternative site

There is an alternative site at Wonastow Road, Monmouth (CS0274) that offers both housing and employment facilities. It is within easy walking distance of major employers such as Siltbusters, Triwall, Singleton Court and Mandarin Stone and town centre businesses. Traffic from this location is away from the towns pinch points and can distribute more easily via the dual carriageway and the link road. The soil is more

suitable for SuDS because it is free draining and the site is downstream of where Monmouth takes its drinking water. It is outside the Bat Zone and therefore less environmentally sensitive. There are no issues regarding proximity to a scheduled ancient monument and the site is proposed on lower grade agricultural land. Why is MCC not following the recommendations of its own landscape sensitivity report which concluded that the Wonostow site has 'most opportunity'??

I propose that the above issues strongly support the contention that the Dixton Road site is entirely unsuitable and that a more suitable site is that at Wonastow road with a more realistic plan for 175 new houses.

I urge the council to accept that the Dixton Road site is not suitable for development.

[redacted]

Archived: 19 February 2025 17:19:31
From: [redacted]
Sent: Sat, 30 Nov 2024 10:38:47
To: MCC - PlanningPolicy
Subject: Planning re RLDP 2018-2033 site HA4
Importance: Normal
Sensitivity: None
Attachments:
270 houses Jo.docx;

Please find attached my letter opposing the above application. Kindly acknowledge receipt,
Regards
[redacted]

Sent from my iPhone

3296

Michelle Holman

[redacted]

Date: 11/11/2024

Monmouthshire Council

Dear Monmouthshire Council – Planning Departrment

Subject: Objection to Proposed Development – RLDP 2018-2033 – CALIDCOT/PORTSKEWETT

I am writing to formally object to the proposed development in our area, and I wish to outline several significant concerns regarding its impact on our local environment, wildlife, traffic, and community services.

Firstly, I am deeply concerned about the potential impact on the local environment and wildlife. The proposed development threatens the natural habitat that many species call home, disrupting the delicate balance of our ecosystem. CAN YOU CONFIRM THAT YOU HAVE CARRIED OUT STUDIES ON THE WILDLIFE AND PLANTS IN THIS AREA – PLEASE SEND ME A COPY OF SAID STUDY – PRESUMABLY YOU HAVE DONE SEVERAL AT DIFFERENT TIMES OF THE YEAR ON THIS SITE?

I am aware that there are ancient woodlands amidst the site you are proposing, along with protected Hedgerows, protected trees and different animal/plant species. There is also a Grade II listed building.

Additionally, the anticipated increase in traffic on the B4245 is alarming. This road is currently a designated 60 MPH route, and an influx of vehicles will not only exacerbate existing congestion but also pose serious safety risks for pedestrians. It is particularly concerning that there are no existing bus services along the B4245, limiting public transport options for residents, which could force more individuals to rely on cars.

The strain on local services is already evident, with our doctors' surgeries, pharmacies, and other facilities facing pressure from the already expanding population due to the recently completed site at Sudbrook with an additional 212 homes and the ongoing site at Elderwood which when finished will total 269 houses. No additional amenities/infrastructure has been done to account for all these additional people in the area.

The lack of parking in Caldicot town Center further complicates access to essential services, and the addition of a new school will necessitate a large parking area, which is not feasible given the narrowness of Crick Road and the surrounding traffic.

Moreover, the disturbance caused by years of construction will be disruptive to our daily lives. Residents, including myself, are concerned about the noise, access issues, and additional pollution to our beautiful countryside during this time. We are still dealing with construction traffic for the unfinished site at Elderwood.

There is also notable concern regarding access to our property and the surrounding roads. All the additional construction vehicles and those associated with The David Broome Centre are likely to cause chaos, with large lorries making deliveries and those transporting horses posing specific dangers, particularly near the proposed school. This raises serious safety questions for all road users and those

living nearby. Crick Road is a very busy road currently going between the B4545 and the A48, being used by all sizes of vehicles.

The presence of construction traffic and increased residents will not only disrupt our daily lives but will also likely decrease the value of all our homes. Given the implications this development poses, we will be requesting compensation or a buyout if the proposal proceeds. No wonder locals are seriously talking about selling up and moving away from the area. There are 3 houses on Crick Road that are up for sale and they are not selling – as no one wants this Development to proceed. You are also pushing local residents to move to other areas.

The local council are selling off fields, fields that are currently being used by local farmers and have been for many generations, where will these farmers go now? The fields around us are occupied by sheep. In this current climate we should ALL be supporting our farmers, not pushing them out!

I DO NOT BELIEVE THAT YOU ARE PROTECTING AND ENHANCING MONMOUTHSHIRE'S SPECIAL ENVIRONMENT AND BIODIVERSTY – YOU ARE DESTROYING IT.

HOW IS THIS SUPPORTING WELL-BEING, HEALTH AND DIGNITY FOR EVERYONE?

BUILDING MORE HOUSES AND EVEN INDUSTRIAL AREAS, IS NOT GOING TO LOWER POLLUTION IT WILL JUST ADD TO IT.

[redacted]

SMALL INDUSTRIAL UNIT, WHICH WILL ENCOURAGE MORE TRAFFIC FROM OUTSIDE OF THE AREA – THEREFORE MORE POLLUTION, MORE TRAFFIC ISSUES, MORE QUEUES, ON AN ALREADY STRETCHED AREA.

WHO WILL WANT TO VISIT THE GWENT LEVELS – WHEN YOU ARE TRYING TO FILL IT WITH HOUSES. THUS DISCOURAGING TOURISM TO THIS AREA.

THE CALDICOT TOWN CENTRE IS NOT THRIVING OR EVOLVING – THERE IS NOT ENOUGH CAR PARKING TO ALLOW ALL THE ADDITIONAL PEOPLE TO SHOP THERE AT PRESENT – THIS WILL ONLY GET WORSE – THUS PUSHING PEOPLE TO SHOP ELSEWHERE. KILKING THE LOCAL SHOPS EVEN MORE. PUTTING MORE BUSINESS OUT OF BUSINESS!

I urge the council to reconsider this proposal, taking into account the effects on our community, environment, and safety. Thank you for considering my objections. I look forward to your response.

[redacted]

Please see Personal Page – thank you

On a personal note:

We recently moved into this property, being attracted to it as an area of natural beauty (The Gwent Levels), a place where we can watch the local wildlife from the comfort of our own home or take our dog out amongst it. There is an abundance of local wildlife and it's an amazing thing to watch.

We chose is as it is a place where we could emerse ourselves into a local community/village. A place that is rich in history and an honour to call our home.

The house itself has glass everywhere allowing us to make the most of the amazing views to all sides. You now want to totally encase us and send us back to where we came from. A TOWN NOT A VILLAGE!

THIS IS AN INVASION OF OUR PRIVACY.

We moved from a housing estate due to my health issues and preparing for our retirement. Now you want to put us straight back there. [redacted]o ensure we have a more relaxed way of life – to be at one with nature.

This certainly does not support my health and well-being and that of the local community. You only have to read Facebook, to see how upset/angry local residents are.

Unfortunately, you have made the online form to complicated to allow people to fill it in confidently, therefore they do not do it – this is something that should be looked at as a matter or urgency. EVERYONE SHOULD BE ENCOURAGED TO HAVE THEIR SAY – THIS IS NOT POSSIBLE AT PRESENT. This is not inclusive!

[redacted]

11th December 2024

SENT VIA EMAIL

I object to the development at Mounton Road, Highbeech Roundabout Chepstow being added to the RLDP.

Air pollution and Traffic are the two major concerns for this site/area/town

If Monmouthshire County Council and the Welsh Government add the Mounton Road/Highbeech Roundabout Development Site and the Caldicot/Portskewett Development Site to the RLDP they are doing so knowing that the nitrogen dioxide levels at Highbeech roundabout/surrounding roads will increase; further breaking the EU Limit Value of 40µg/m3. You are already aware that this **will have a negative impact on local residents' health and wellbeing**. The proposed site at Caldicot/Portskewett (770 houses, a primary school, Community hub and an industrial estate – which could mean an additional 2000 cars on our roads per day – most of which will use Highbeech roundabout) will also have a massive impact on the amount of traffic each day.

The Highbeech roundabout is also the main route used by most drivers when attending Chepstow Race Course. Last year alone there were 32 days of racing! They also hire it out for private events/parties/markets etc. So for 32 days of the year – horses boxes are also using this roundabout, plus hundreds of extra cars for people watching the races. It is also the roundabout that you need to use to access Gloucester and the North. It is also used by tourists to access other parts of Wales.

Chepstow is the gateway to Wales - a picturesque border town situated at the southern end of the Wye Valley in an area of outstanding natural beauty. https://visitchepstow.wales/

Not so pretty when it looks like any other town with housing estates and large traffic jams - not very inviting, thus making it a place that people will now just pass through in the future (not stopping). Pushing tourism away from this beautiful town and all other local areas. This will have a detrimental effect on local businesses.

Drivers are often exposed to high levels of air pollution, particularly when driving in traffic. In fact, drivers are at the highest risk of exposure to traffic-related air pollution. (No matter what time of day /or from which direction you approach the Highbeech Roundabout, there is always a queue, meaning drivers are breathing it in, unfortunately for those drivers using the roundabout at peak times, can often be sat there for 30 minutes – EVERY DAY).

High levels of nitrogen dioxide (NO2) can affect car drivers:

- **Health**: Breathing in high levels of NO2 can inflame the airways and affect lung function over time. Longer exposures can contribute to asthma and increase susceptibility to respiratory infections.
- **Driver fitness**: Toxic air can impact driver fitness.
- **Distractions**: Itchy nose and watery eyes caused by air pollution can distract motorists.
- **Traffic collisions**: A study found that when NO2 levels rise by one microgram per cubic meter, the number of traffic collisions rises by two percent.

The evidence for this concern:

https://www.gov.wales/.../160329-a48-chepstow-air-quality...

This is from 2007 and air quality has not improved since this date.

From the Assessment:

'Poor air quality has the potential to affect people's health and quality of life. Welsh regulations and European Union Directives set minimum standards for a variety of pollutants. These include nitrogen oxides, particulate matter and ozone. Air quality standards are set to protect human health. The UK's air quality objective for annual mean nitrogen dioxide (NO2) (and the EU Limit Value) is 40µg/m3.

... elevated concentrations of nitrogen dioxide occur along a limited stretch of the A48 on Hardwick Hill. Accordingly, an Air Quality Management Area (AQMA) was declared in 2007 for properties alongside the A48 on Hardwick Hill, from the Highbeech roundabout to the junction with the B4293, and along the B4293 to the junction between Moor Street and Steep Street'

This is the latest 2023 Air Quality Progress Report

https://www.monmouthshire.gov.uk/.../MCC_APR_2023_FINAL...

Pollution levels are still high and there doesn't seem to be any real investment / plans to improve this.

It states:

'Air Quality is a consideration in the LDP and planning applications'

This evidence clearly puts the development in conflict with the RLDP's (and Welsh Government Well Being Objectives - **https://wcva.cymru/.../upl.../2020/01/Prosperity-for-all.pdf**) stated objectives:

'Make our cities, towns and villages even better places in which to live and work.' and

'Embed our response to the climate and nature emergency in everything we do'

These concerns are backed by this evidence. If both the Mounton Road and Caldicot/Portskewett developments progress and are added to the RLDP there is evidence to show that air pollution levels will increase having a **negative impact on local resident's health and well-being**.

We all know that mitigating measures like bike lanes and signs to switch off engines will not have any significant impact on these figures. This is very concerning for all residents and the future health and that of children's health, plus anyone passing through or visiting the area – tourists!

Despite studies demonstrating the problems, the Welsh Government has stated that High Beech is not going to be prioritised (nor is a bypass, which would take most of the through traffic off the A48). There is no infrastructure plan to mitigate the impact of traffic growth. Notably for this site, how will vehicles leave the site to turn right into queuing traffic?

Additional traffic generation at any location in Chepstow that interacts with Highbeech roundabout can only worsen the already illegal pollution levels on Hardwick Hill. I have been informed that there is no evidence or plan to enable modal shift (i.e. more people onto public transport or active travel). No buses come along the B4245 from Caldicot/Portskewett – so anyone wanting to access Chepstow, the M48 or Bristol will have to use their cars!).

150 new homes will clearly significantly increase traffic flow on the Highbeech roundabout and connecting roads. (plus all the new homes in this RLDP for Caldicot/Portskewett proposed development – 770 homes and industrial estate – staff and deliveries).

Furthermore, a hotel and care home will bring daily staff commuters and visitors. New traffic daily to the Highbeech roundabout.

During the construction phase of both these sites (Highbeech roundabout and Caldicot/Portskewett), there will be huge surge of traffic, which includes construction staff working on the sites for years to come, plus all the deliveries of materials, which mean a huge number of articulated lorries, cranes, cement mixers, lorries carrying equipment like excavators, dumper trucks, diggers, forklift trucks that cannot be driven to site. They could be using this roundabout for up to approximately 8 years (Caldicot/Portskewett site). This roundabout cannot cope with this additional volume of traffic and the size/weight of vehicles (28 tonnes – 18 meters in length).

Other reasons why the Mounton Road site should not be added to the RLDP.

Impact on landscape/historical amenity**.** Development on this site will spoil the natural character of the Chepstow and with the introduction of a hotel and residential home, the impact from noise and general usage of the area could damage the natural environment and diminish the wellbeing of the existing community, which would be against the plan's ambition - hence development at this site is not compatible with planning objectives.

Provision of social infrastructure such as healthcare and education needs significant investment, before any new housing/commercial developments are even considered. The area is already struggling and adding hundreds more people will exacerbate this. Thus, effecting currents residents Health and Wellbeing.

The national plan calls for low levels of development in Monmouthshire as strategic government investment will be focussed elsewhere.

In conflict with:

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP)

https://www.monmouthshire.gov.uk/.../Monmouthshire-RLDP...

Communities. To ensure Monmouthshire is a connected place where people feel part of a community, are valued, and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.

Infrastructure. To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in place or can be provided to accommodate new development.

It's essential to mention Chepstow's notorious pollution levels, ranking it among the UK's most polluted locations regarding air quality (Reference: **https://www.huffingtonpost.co.uk/.../air-pollution-uk**...). Any additional structures in the locality will worsen an already dire situation.

The proposed site at Highbeech roundabout is not merely unsuitable but potentially unlawful. Negligence in pondering these elements will lead to formal complaints to both the Welsh Climate Change, Environment and Rural Affairs Committee and the UK Climate Change Committee.

I earnestly urge you to give these matters the gravity they deserve.

Kind regards

[redacted]

3297

Mr W T Phillips

[redacted]

MONMOUTHSHIRE
COUNTY
COUNCIL

25 NOVEMBER 2024

Dear Sir

I am writing to raise my objections about the proposed building of 270 houses on fields off Dixton Road Monmouth.

As recent wet weather has proved the drainage system for the Dixton area is woefully inadequate with the water from the proposed field completely submerging a considerable section of Dixton Road for the majority of the day.

There is also a major issue regarding polution and traffic conjestion with more than 400 extra vehicles expected on a site of this size.

The A40 aproach to Dixton roundabout is constant traffic from both directions with the pot holes along Dixton Road, Dixton Close, The Gardens and Hereford Road plus The Wye Bridge among the worse I have encountered anywhere on my travels.

To my mind the obvious solution would be to build houses on Wonastow Road. There is a residential area with the type of housing that is being proposed already there with the fields nearby making it an ideal infill area.

There is also an area in Raglan that Monmouthshire County Council refused planning for 111 houses a few years ago. I think it would make sense to revisit that application as it dosn't have the problems that Dixton Road has.

Regards

[redacted]

P.S. There will, of course, be huge repercussions for the wildlife in the area. I have ~~I have~~ seen Bats, Hedghogs many different Bird types and even Fox families crossing the road onto the overgrown area opposite this field

3298

Carol Reynolds

[redacted]

22nd November 2024

To whom it May concern.

I am writing to express my concern over the proposed housing development on Dixton Road (HA4 land at Leasebrook)

The Planning Department seems to have chosen to ignore many basic factors in choosing this site.

It appears the development is too close to the protected AONB area, also, there are concerns for the Greater Horseshoe bats which are found at Newton Court. It is also prime agricultural land, so why has this been allowed? The Wonastow site has none of these factors.

The site is the size of 20 football pitches and a recent survey has shown that water run-off will double with the number of houses being built. I walk down the Dixton Road regularly and after rain there is always standing water at the bottom of that field as well as large puddles and surface water on the road.
The Wonastow site is acceptable regarding flooding issues.

Where will the surface water from this site drain to? The River Wye of course, and upstream from our water treatment

works which is where our drinking water is taken from. Over recent years there have been many complaints about water quality and concerns regarding cryptosporidium which is being caused by run-off. Surely this development will make matters worse for all the inhabitants of Monmouth and their good health. Safe drinking water is a basic requirement for all.
There would not be this issue with the Wonastow site.

I have concerns for the health of families on the site regarding levels of pollution from the busy Dixton roundabout. Has a study been undertaken to measure those levels? With the possibility of up to 400 cars being owned by the residents of 270 houses this will further impact on air quality, not only for them but residents of Dixton Road, Dixton Close and the children at Monmouth Comprehensive School.
This will not be a problem at the Wonastow site.

The Dixton Road is severely congested in the morning and evening with school buses and cars driving to and from work and school. How on earth will cars from the development safely 'join the traffic at those peak times?

This won't be an issue with the Wonastow site.

Regarding Active Travel - there is no infrastructure planned for this but I understand a right of way is being suggested through the hedge at the bottom of Dixton Close [redacted] and the hedge was there when I moved in. Has anyone considered The Hedgerow Protection Act?
Would parking increase in Dixton Close because of the difficulty in joing traffic on Dixton Road? Parking is already an issue at the lower end of Dixton Close
This would not be a problem on the Wonastow site.

The Wonastow site already has access points onto a minor road. It is near to 2 major employers and pedestrians have a safe place to walk. The pavement along Dixton Road is narrow and alongside a busy road. I would be worried for the safety of children and parents walking to school and work.
The Wonastow site is safer.

Additional housing is needed in Monmouth but already the doctors surgeries and schools are struggling with over subscription. There just isn't the infrastructure to support such a large development

Thank you for reading this letter and I hope you will consider the points I have made.
Yours sincerely
[redacted]

3299

Nigel Preen

Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP151GA

Subject: Objection to [RLDP 2018-2023 Caldicott/Portskewett] Development Proposal

Dear [Council Member/Planning Department],

I hope this letter finds you well. I am writing to formally object to the proposed development project [RLDP 2018-2023 Caldicott/Portskewett] located at North Portskewett/Caldicot East as outlined in the recent planning proposal for our area.

I have several significant concerns regarding this development that I believe warrant your attention:

1. Impact on Local Environment: The proposed project threatens to disrupt the natural environment, including the Badgers , Hedgehogs and Foxes that regularly visit the field behind our Hedgerow along with the birds of prey that live in the woods in these fields and rely on food from the green fields . The loss of these vital ecosystems and potential harm to endangered species and the disruption of natural water drainage systems could have long-term consequences for local biodiversity and community well-being. As stewards of our environment, we must prioritize the preservation of our natural resources for our future generations.

2. Traffic and Infrastructure Strain: The increase in population density resulting from this development would put additional strain on our local infrastructure and the village life. The existing roads are already at capacity and some are very narrow, and I foresee increased traffic congestion, safety issues for pedestrians, cyclists and children, and potential challenges for emergency services, putting lives at risk

3. Community Character and Aesthetics: Portskewett is known for its natural beauty, tranquillity, and close knit community atmosphere , introducing a large scale development would not only disrupt the landscape but also undermine the unique charm that attracts residents and visitors alike. The increased population density and commercial activity could lead to a loss of the villages identity and heritage. The development does not align with the character of our neighborhood. The proposed design like all new developments is inconsistent with the surrounding area and would alter the community's aesthetic and historical value.

4. Infrastructure Facilities: One of the primary issues with this development proposal is the lack of adequate amenities such as shops , Healthcare facilities and recreational areas and with insufficient parking in Portskewett and Caldicot at the moment that cant even cope now let alone with another 1500 cars in the area

5. Potential Increase in Noise and Pollution: The construction and eventual operation of this development could lead to increased noise levels and air pollution and carbon emissions and places undue pressure on already strained transport systems, which would negatively impact the quality of life for current residents.

Given these concerns, I urge the council to reconsider the approval of this development. It is essential that we prioritize the interests of the existing community and protect our local environment.

Thank you for considering my objections. I hope that the council will take the necessary steps to ensure that any development in our area aligns with the values and needs of its residents.

Yours Sincerely,

[redacted]

[redacted]

3300

Richard Thorp

[redacted]

Ref: Proposed Development of 270 Homes at Dixton Road, Monmouth
RLDP 2018-2033, Site HA4

Dear Sir/Madam,

I am writing to express my concerns regarding the proposed development of 270 houses on land off Dixton Road, Monmouth, as outlined in the Deposit Plan.
As a regular walker in these fields, I am familiar with the area, [redacted] The planned 'emergency vehicle access' [redacted], and the potential impact of this development on both our daily lives and the wider community is significant. My primary concern, however, lies with the broader implications this development may have.
Firstly, the impact on local infrastructure is a key issue. Our healthcare services, including doctors, dentists, and schools, are already under considerable pressure, with some areas operating at or over capacity. Furthermore, the site offers minimal opportunities for local employment accessible by sustainable transport, meaning many future residents will likely rely on private vehicles.

Traffic congestion is another pressing concern. The addition of 270 homes would likely bring an additional 400+ cars onto the already congested roads, particularly during peak hours. This would exacerbate existing traffic issues and increase CO2 emissions, contributing to further air pollution. The lack of safe, pleasant, and accessible walking or cycling routes from the site means residents would have few alternatives but to use cars.

Another major concern is the environmental impact, particularly on the quality of drinking water and the health of the River Wye. Monmouth's water supply has recently received warnings from the Drinking Water Inspectorate, including a risk from Cryptosporidium, and the necessary treatment upgrades will not be completed until 2030 and will only benefit customers downstream. Adding 270 new households to the area would place further strain on the already fragile water system.
The proposed drainage system (SuDS) is also highly unsuitable for this site, especially considering the clay soil, which already results in regular flooding in this area. The SuDS system is unlikely to mitigate phosphate runoff, and this would exacerbate water pollution in the Wye, further endangering Monmouth's drinking water supply.

Additionally, the site is in an environmentally sensitive area, lying within the sustenance zone for the endangered Greater Horseshoe Bat, which depends on the local grazing land and hedgerows. This is a serious concern given recent issues regarding the landslip repair along the dual carriageway. Furthermore, the site is located near the Wye Valley AONB, which, according to planning policy, should be avoided for major developments. The visual impact on the historic Dixton Mound and the surrounding landscape,

combined with the fact that this site is prime agricultural land, raises further objections to this proposal.

I would also like to highlight the availability of a more suitable alternative site at Wonastow Road (CS0274). This site is better positioned, with easier access to existing employment hubs such as Siltbusters, Triwall, and other town businesses, and is away from traffic congestion hotspots. The soil here is more suitable for the implementation of SuDS, and the site is downstream of Monmouth's water intake, posing no risk to the town's drinking water. Additionally, this site lies outside the Bat Zone, and is less environmentally sensitive.

Monmouthshire's Landscape Sensitivity Report suggests the Wonastow Road site has the most potential for development, with fewer environmental and logistical concerns. The proposed development at Wonastow Road would also address the need for both housing and employment, with a more appropriate scale of 175 homes, rather than the much larger and more intrusive development at Dixton Road.

And finally, following the storm over November 23rd/24th it is clear that the proposed emergency route will be in use far more frequently in the future, please see attached photos of Dixton road. Priory Lane is quiet single track lane and not suitable for the volume of traffic from the proposed site. It would have terrible impact on noise levels

[redacted]

In light of these issues, I strongly urge the council to reconsider the suitability of the Dixton Road site for development and instead focus on the more appropriate Wonastow Road location.

Thank you for considering my views.

Yours faithfully,

[redacted]

3301

Susan Read

Re:

25/11/24

Dixton Road Development
CS0270/[redacted] HA4

Fro[redacted]

I wish to object to the siting of the development at CS0270 Dixton Road for several reasons.

1) Lack of active travel / public transport links.
2) Traffic congestion added to a problematic area, with subsequent increase in air pollution etc.
3.) Increased water run off + pollution near the point where drinking water is extracted.
4) Lack of infrastructure in this area generally.
5) It is grade II farming land.
6) Environmentally sensitive.

If you must build new, rather than use existing current derelict or unused infrastructure, the Monastow Road site, CS0274 is generally a better choice.

However, in light of recent events, I believe that the entire RLDP needs a rethink.
Monmouth has the poorest transport links of the whole county, the worst healthcare provision locally, and is geographically constrained, on a flood plain.

The geographical constraints, including a town with one main road, mean that many issues posed by development cannot be addressed.

There is little land available that is not on a flood plain to build additional infrastructure to support a growing population.

I think some common sense needs to be applied, not simply a random target based entirely on population percentages.

I hope current events, i.e. the severe flooding yesterday, will cause a rethink about the overdevelopment of Monmouth.

[redacted]

3302

Andrew Burnett

Archived: 13 February 2025 07:52:02
From: [redacted]
Sent: Sat, 23 Nov 2024 16:49:04
To: MCC - PlanningPolicy
Subject: Objection to Priory Lane emergency access for proposed Dixton housing development
Importance: Normal
Sensitivity: None

Hello,

[redacted]. The access to the parking at the [redacted]

I understand that there is proposed an 'emergency access road' that will join the suggested new development, via Priory lane, onto Hereford Road.

I would like to object to this element of the proposed development. My reasoning is that I cannot see how this access will not become an additional entry point for Hereford Road from the general population of a large housing estate. Additionally, the Hereford Road section leading into Monmouth from this point is already challenging, due to parked cars around which this direction of traffic must wait for on-coming vehicles.

[redacted]

I hope you will add this to the many points of feedback I am sure you have received during the period of consultation.

Many thanks for your consideration,

[redacted]

3303

Anthony Brennan

[redacted]

From: [redacted]
Sent: 23 November 2024 14:30
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: RLDP 2018-2033 / Site HA4 / 270 Houses on Fields off Dixton Road, Monmouth / Public Consultation on the deposit plan

Dear Sir,
I am writing to formally express my deep concern regarding the proposed development of 270 houses off Dixton Road in Monmouth. I believe this development will have a significant negative impact on the local community and environment.

The site is ecologically sensitive, as it falls within the core sustenance zone for Greater Horseshoe bats which roost at Newton Court, one of only three sites in Wales and the only site for this species in Monmouthshire. The removal of the equivalent of twenty football pitches of agricultural land, hedges and the addition of artificial light will have a detrimental effect on the biodiversity of this area.

The development is also located upstream of Welsh Water's extraction point in the River Wye for drinking water. This means any surface run-off from the proposed site is likely to pollute our drinking water. There were alternative sites identified, for example off Wonastow Road (CS0274), which are located downstream of the extraction point so would not directly affect the drinking water quality of the town.

The Wonastow Road (CS0274) site is also situated on lower grade agricultural land, outside of the core sustenance zone for rare bats and within easy walking distance of major employers, for example Silt Buster, Mandarin Stone, and Singleton Court.

I urge you to reconsider the proposed development and explore alternative, less harmful sites. Specifically, the site off Wonastow Road (CS0274) presents a more suitable option, as it is located downstream of the water extraction point, on lower grade agricultural land, outside the core sustenance zone for rare bats and within easy walking distance of major employers.

I believe that addressing these issues is crucial to ensure the long-term viability and sustainability of the proposed development. I look forward to a resolution that prioritizes the well-being of our community and the environment.

[redacted]

3304

Daphne Smith

[redacted]

From: [redacted]
Sent: 23 November 2024 15:31
To: MCC - PlanningPolicy
Subject: RIDP Consultation 2024

I know you will be receiving a lot of correspondence about the proposal to build 270 houses off the Dixton Road in Monmouth and I would like to add my comments. I am very concerned about this proposed development on many levels, most of which have been outlined by the Gateway to Wales action group.

I echo their concerns about:

- wildlife
- the loss of good agricultural land
- surface water run-off
- traffic tail back onto the A449 and the Dixton roundabout
- the historic significance of Dixton Mound which was the site of a castle in the past.

I would like to add the following

- The schools are full
- Getting a doctor's appointment is very difficult
- The sewage treatment plant is at capacity
- Parking in Monmouth is inadequate

On a personal level, as a resident of Dixton Close I am very concerned about the proposal to make this the sustainable transport route. Not only will you be cutting through a hedge which has been there certainly since the houses were built in the early 1960s, but possibly much longer. This will mean that this quiet cul de sac will be busy with people, dogs, cyclists, schoolchildren coming and going. [redacted] it will change the very nature of this quiet area where many elderly people have chosen to live.

I really feel that the alternative site on the Wonastow Road is a much better proposition. It is still a flat walk into town, it doesn't flood, there are fewer traffic issues as there are no main roads on that side of town. Yes there is still an issue with wildlife but that will be so wherever houses are built in this area.

I appeal to you to vote against this proposed development.

Yours sincerely,
[redacted]

3305

David Greenhalgh

[redacted]

From: [redacted]
Sent: 24 November 2024 21:11
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Objection to Planning Application for Site HA4 (270 Houses on Fields off Dixton Road, Monmouth)

I object to the proposed development on site HA4 for 270 Houses on Fields off Dixton Road, Monmouth due to the severe and irreversible impact it will have on Monmouth's character, environment, and community.

This site is close to the Dixton roundabout, a known traffic bottleneck. Adding hundreds of additional vehicles from this development will exacerbate already severe congestion, worsening delays at Dixton Road whilst generating hundreds of tonnes of CO2 annually, further polluting an area where air quality already exceeds WHO guidelines for NO2. The council fails to properly monitor particulate matter, which are especially harmful, given the site's proximity to Monmouth Comprehensive School and Haberdashers' Monmouth School.

The steep gradient of the site and lack of accessible cycle paths will force residents to rely on cars when going into town, increasing environmental and traffic pressures, despite claims to the contrary by those attempting to push through the development.

This site is at the foot of an extraordinarily beautiful valley which lies within the setting of the Wye Valley AONB, a landscape that must be safeguarded against inappropriate development with National planning policy mandating that AONBs must receive the highest level of protection.

There is serious concern regarding the lasting impact on biodiversity and I am extremely concerned that if passed development will unacceptably jeopardize the habitats of the Greater Horseshoe Bat population, a protected species which relies on grazing land and hedgerows for foraging and flight paths.

With what appears to be a sudden move from a more preferable site, (Wonastow M07) this application appears rushed and politically driven, ignoring community concerns and favouring powerful housing developers. Such a significant development demands thorough scrutiny and a transparent decision-making process that prioritizes the town's long-term wellbeing over short-term gains.

The irony is severely troubling that the Labour Party campaigned on water quality, with national notoriety being given to this area and the River Wye in particular and yet they have used the desperately needed water cleaning programme to justify further expansion of housing in this area so close to the river, when the science, which they were so keen to emphasise in their election campaign, demonstrates that the run off will not drain adequately due to the nature of the soil.

I am deeply sceptical of the motives in view of the apparent politicization of this issue. Support and objections amongst the main parties appear to be divided almost exclusively along party lines. Decisions of this importance should be based on the merits of the proposal and the will of the local community, not partisan allegiance. This distorts properly accountable appraisal of the impact of the project, undermining public trust.

Also, the abrupt shift from the originally intended site to this new location raises concerns about whose interests are being prioritized. It strongly suggests that the development is being advanced to benefit powerful, consolidated housing firms rather than the community. Such a significant change demands far greater scrutiny and time to reach a decision that genuinely reflects local needs and the long-term wellbeing of the area.

I urge the council to please reject building on that site, HA4, in order to preserve this invaluable AONB and ensure development decisions are both transparent and accountable. Please protect Monmouth's natural and community heritage by considering a more suitable location.

Kind Regards

[redacted]

3306

E J Brennan

[redacted]

From: [redacted]
Sent: 22 November 2024 15:39
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: 270 Houses on Fields off Dixton Road, Monmouth RLDP 2018-2033 Site HA4 Public Consultation on the Deposit Plan

Dear sir,

I would like to formally object to the development of 270 houses planned for land at Leasbrook, Monmouth

My concerns are as follows:
•Water quality & pollution-Rain runoff pollution would contaminate the River Wye about 400m upstream from Monmouth's drinking water intake.
•Environmental damage, especially to wildlife & bat populations that rely on the grassland and hedgerows. The Monmouthshire LLCA identifies the site as highly sensitive, with other less sensitive areas recommended for development.
•Additional pressure on the Road network-especially congestion onto the Dixton roundabout and the resulting pollution from CO2 emissions.

There is a proposed alternative site at Wonastow Road, Monmouth (CS0274) that offers both Housing and Employment facilities. It is within easy walking distance of major employers. The soil is free draining and the site is downstream of where Monmouth takes its drinking water.
Also importantly it is outside the Bat Zone and so is a less environmentally sensitive area.

[redacted]

Sent from my iPhone

3307

Edwinda Williams

[redacted]

From: [redacted]
Sent: 22 November 2024 10:33
To: MCC - PlanningPolicy
Subject: RLDP RAGLAN LITTLE CASTLE BUSINESS PARC

Good Morning

I attended one of your drop in sessions to view the RLDP for Raglan and could see that there was no provision noted for any increase of Employment Land at Little Castle Business Parc. We are concerned that the Plan, which will run to 2033, will prevent any future development of the site and going forward any planning applications will not be considered as they could be outside of the present designated area. We have additional land adjacent to the present site and running parallel with Pen-y-Parc Road that could easily be incorporated into the Business Parc as all our services run through this area and access would be through the existing entrance.

We should be very grateful to know your thoughts on the position concerning Little Castle Business Parc which has expanded as needs have arisen but as the proposed Development Plan does not include it in any future proposals we feel it will stand still and therefore not be able to contribute to the local area.

Regards

[redacted]

[redacted]

3308

Gary Hill

[redacted]

From: [redacted]
Sent: 25 November 2024 20:02
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: RLDP 2018-2033 Site HA4
Attachments: Grass snake in the garden.JPG; Red legged Partridge.JPG

PUBLIC CONSULTATION ON THE DEVELOPMENT PLAN

I am and have been resident in Monmouth for 35 years and wish to raise an objection to the building of 270 houses off Dixton Road Monmouth.

The site reference CS0270 should not be built on due to the following.

Road Traffic
In addition to bringing an increase in air pollution, it will bring an increase in congestion on the already heavily congested Dixton Road at the junction of the A40 roundabout, especially at school start and finish times.
The current level of CO2 emissions in this area already exceeds WHO guidelines.

Site access
The proposed access onto Dixton Road with Priory Lane being an emergency access is totally inadequate.
Priory Lane is a narrow single track road that is totally unsuitable as emergency access.
There are already 17 properties, as well as farm machinery, that rely on Priory Lane as their only access to Hereford Road, requiring great care to be taken by residents.
Navigation of the junctions of Priory Lane with the Hereford Road and The Rickfield with Priory Lane are hazardous due to visibility issues.
Additional use of Priory Lane by emergency vehicles will make it extremely dangerous.

Water Quality and Pollution
More housing will bring additional contamination to the already polluted River Wye from phosphate levels in rain runoff upstream of Monmouth's drinking water intake.
Monmouth's River Wye drinking water source is under warnings from the Drinking Water Inspectorate the addressing of which will not be complete until 2030.
The proposed drainage system will have little, if any, effect on the site's clay soil.

Environmental sensitivity
This site is prone to flooding along its boundary with Dixton Road where the single main access is proposed.
As well as Horseshoe Bats from the nearby roost being impacted in having their sustenance zone severely reduced, (they use the whole of this area up to and beyond the Dixton and Hereford Roads), there are also grass snakes, lizards, red legged partridges and the odd deer to be considered.
This site is in close proximity to the protected Wye Valley AONB who's policy discourages major developments near such areas.
This is prime agricultural land which, according to planning laws, should be conserved.
This area has a high historical landscape sensitivity.

Alternative site
Having better access to Active Travel routes, town centre amenities and being closer to potential employment opportunities, a far more suitable site would be CS0274 at Wonastow Road Monmouth.

Other issues
Employment opportunities in Monmouth are, to say the least, limited with few, if any, being skilled.

For work I personally have had to travel to Bristol every day for the past 35 years by car due to Monmouth being so remote from transport links.
Over this time transport links have not changed even with all the additional building that's happened in Monmouth since.
Additional housing in Monmouth can only serve to make Monmouth a dormer town with new residents working elsewhere.
Monmouth is already overstretched and Increasing its population will have a detrimental impact on its multiple generations.

Yours sincerely.
[redacted]

3309

Gillian Rogers

[redacted]

From: [redacted]
Sent: 27 November 2024 09:15
To: MCC - PlanningPolicy
Subject: Proposed development Portskewett

I am really concerned regarding proposed development of 770 homes on Gwent levels Portskewett/Caldicot. I doubt that many of these homes will benefit local people on low incomes and will probably be purchased by people out of the area.

We have experienced so much development over recent years with scant regard for local people on limited incomes unable to buy their own home. Our infastructure is already being stretched with long waits for surgery appointments and lack of school places.

There is also the risk of harm to our environment with more pollution of our waterways from yet more strain on the sewerage systems. A lot of our flood plains have already been built on over the years.

The roads are also becoming increasingly congested especially at peak times and they are desperately in need of repair too. There are many times when we experience grid lock from Magor to Chepstow due to traffic accidents and road works. More housing can only make matters worse.

We are also losing so much of our countryside to the detriment of the well being of the people already living here.

I sincerely hope that Monmouthshire County Council will oppose this development .

[redacted]
A concerned resident

3310

Harriet Brennan

[redacted]

From: [redacted]
Sent: 23 November 2024 14:32
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: 270 Houses on Fields off Dixton Road, Monmouth RLDP 2018-2033 Site HA4 Public Consultation on the Deposit Plan

Dear Sir,

I am writing to express my strong objection to the proposed development of 270 houses off Dixton Road, Monmouth. This development, as detailed in the planning application, will have a devastating impact on our community and the local environment.

Key Concerns:
Exacerbated Traffic Congestion: The site's location near the already congested Dixton Roundabout will inevitably lead to a significant increase in traffic. This will result in longer journey times, increased air pollution, and noise disturbance for local residents and businesses.

Destruction of Critical Habitat: The proposed development site is the only core sustenance zone for the endangered Greater Horseshoe Bat in Monmouthshire, and one of only three in Wales. The destruction of this vital habitat will have catastrophic consequences for this protected species. Horseshoe bats play a crucial role in the UK ecosystem, controlling insect populations and contributing to pollination.

Contamination of Water Supply: The site's location upstream of Welsh Water's water extraction point poses a serious risk of water pollution. Surface runoff from the development, carrying pollutants such as phosphates could contaminate our drinking water supply, jeopardising public health and potentially leading to costly water treatment measures.

I urge you to carefully reconsider this development proposal and explore alternative, sustainable options. An alternative proposed site, such as the site off Wonastow Road (CS0274) presents a far more suitable location, as it is downstream of the water extraction point, on lower-grade agricultural land, outside the core sustenance zone for rare bats, and within walking distance of major employers.

I implore you to prioritise the well-being of our community and the protection of our environment.

Yours faithfully,
[redacted]

3311

Lynda Ord

[redacted]

From: [redacted]
Sent: 25 November 2024 11:02
To: MCC - PlanningPolicy
Subject: 270 houses on fields off Dixon Road

I would like to raise my concerns regarding the 270 houses that have been proposed on the fields off Dixon Road.
The congestion on Dixon Road at peak times i.e.school times when coaches and buses are collecting or dropping off children not just at the Comp but also the girls and boys schools, then to have a further even at the worse estimate 200 more cars, the air pollution will be even higher, it already exceeds WHO guidelines!
Why build on high grade farmland when the other proposed site Wonastow Road (CS02374) would seem to be a much better site as the road and cycle system is much better and most employers and shops are situated at that end of town.

[redacted]
Sent from my iPad

3312

Not stated

From: [redacted]
Mail received time: Tue, 26 Nov 2024 20:03:11
Sent: Tue, 26 Nov 2024 20:02:36
To: MCC - PlanningPolicy
Subject: FTAO: planning policy east of Caldicot
Importance: Normal
Sensitivity: None
Archived: 08 March 2025 08:50:59

I object to the building of 770 homes Caldicot does not have the infrastructure for this growth, schools, DR's appointments etc, are being stretched the ground that is being proposed is a highly risk flooding area.
And with regards to the resent growth the council have let the

3313

Peter Shaw Willington

[redacted]

From: [redacted]
Sent: 22 November 2024 18:02
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Proposed Development Of 270 Houses On the Dixton Road Field

Dear Sirs,
I have lived in Osbaston, Monmouth for 24 years and would like to air my comments regarding the above reference.
I have attended a number of meetings with like minded residents concerned about the proposal to build 270 houses on the field overlooking the **Dixton** roundabout.
I have a number of concerns and observations and would like to list them here.

1. From an aesthetics perspective I feel that an elevated vast number of houses so apparent on the hillside is not in keeping with the rural town image and considering this is a Gateway to Wales entrance just projects the wrong image for a small town surrounded by lovely and in the main unspoilt countryside (AONB). **'Blot on the landscape'** is an expression that comes to mind.
2. The unfathomable point I still cannot understand is why a sizeable housing development would be proposed at one of the busiest sections of our local road system. The roundabout is and has always been a potentially hazardous and dangerous one to navigate. Heavy trucks and cars go around at great speeds so traffic approaching from Monmouth are often queuing particularly at peak times to progress their journey. This will only be exacerbated by additional traffic coming off or entering onto this proposed housing development.
3. This section of road approaching the roundabout is often subjected to flooding after periods of heavy rain fall and I wonder about how this would be successfully dealt with when the normal absorption of water onto the current field of grass is replaced by tarmac road, pavements and houses and the subsequent run off.
4. And where does this additional water go, yes into the river Wye. This is already a much published contaminated stretch of waterway and I can't help feeling that this would just make matters worse and also wonder about the negative impact when the river is running very high due to rainfall upstream!
5. Irrespective of the house designs and category of houses, I am very concerned about where the inhabitants are suppose to find work locally.

   Most of our major and smaller businesses have recorded little ambitions towards increasing their employee count and if this was to continue; I would imagine that most will have to seek work elsewhere which would necessitate commuting to either Ross, Hereford, Gloucester, Newport, Cardiff etc thus again creating more traffic flow. This would invariably contribute to more **air pollution**, something that we are all working hard to minimise. It must be noted we have no railway station and bus services are what you would unfortunately expect from a rural town.

6. Presumably, a number of the households will have children wishing to take up primary and secondary schooling places, again this is an issue about capacity of the Comprehensive and primary schools in Monmouth.
7. The existing medical services; Doctors and Dental practices have not fundamentally increased in line with population and it has become noticeable that waiting times for appointments either in person or telephone are not always what you would expect. Our surgeries are under intense pressure to cope.

In conclusion, I feel that while acknowledging that there is an urgent need for additional housing in general, the key question that should be considered is whether this is the most appropriate area to build this type of development.
Although I accept that there will probably be resistance in many areas of Monmouth to house building in their vicinity, it is a fact that the **Rockfield** and particularly the **Wonastow** housing areas are better placed for further expansion. They are in close proximity of the 2 industrial estates containing our largest and mid sized employers but equally importantly have a thoroughly excellent active travel way access to both work and town. The sites are not so prominent and therefore are more environmentally acceptable.
I recently reviewed the number of 'legacy' pieces of land in the Monmouth area where previous builders did not build to their permitted number.
If these areas had been fully developed to their maximum, a good percentage of the 270 houses could have already been built and occupied.
I hope that this whole development proposal can again be reconsidered by the planners to ensure that Monmouth retains its rural town appearance, its quaintness but to also to look at suitable areas where new houses can indeed be built without detriment to the existing human and wildlife population.
I believe that you have been made fully aware of the negative impact this proposed development would have on the environment (bats, birds, insects) by others specialising in this area so will not be labouring the point here but I too have concerns.
Thanking you in anticipation.
Regards,
[redacted]

3314

Sue Gaylard

[redacted]

24th November, 2024

RE: 270 Houses on Fields off Dixton Road, Monmouth; RLDP 2018-2033; Site HA4

I write as a long-term resident of Monmouth to express deep concern regarding the proposal to develop more than 270 houses on agricultural land off Dixton Road.

While not close to my home and therefore having no visual or amenity impact, should the scheme proceed, there will be a significant impact on my enjoyment of the town, and on my daily life. Those impacts will be similar for all the towns residents and for those who come to the town to work and to shop, or indeed simply to enjoy such an historic place.

I am concerned at the inevitable increase in traffic levels on Dixton Road, which for me and many others living to the North of the Town is our principal route to access the A40. During school term time it can take very many minutes of frustrating queuing to gain access to the A40. At times of peak traffic flows on the A40, particularly in the summer months it can again take many minutes, followed by the long queue to the traffic lights. Should a large residential community be established adjacent to this junction the existing problems will be worsened. Interrupted traffic increases pollution and will further degrade the already poor air quality in an area surrounding the two large schools which must surely be a real concern for parents and Councillor's with their responsibility for the welfare of the young.

Should Monmouth become even more difficult to access by road it will surely lead to a marked reduction in visitor numbers both for tourism and particularly for shopping. This in turn will be detrimental to the economic wellbeing of the town.

Many objections have been raised concerning the environmental impact. Water quality is a matter of current concern for residents, and it would seem that the mitigation measures proposed have proven in similar circumstances elsewhere to be ineffective. Similarly, the work proposed by Welsh Water proposes to improve water treatment downstream of the point at which the towns water supply is extracted, thus even a small increase in pollution of the Wye, in the area of Dixton, upstream of the water extraction point can only worsen the standard quality of our drinking water.

We accept the need for additional housing in the county, we urge reconsideration of the more suitable sites available in Wonastow, and to the East in Wyesham. Neither location poses the same environmental risks to Monmouth citizens, nor would they have the same impact on traffic flows. Wonastow and Wyesham both have existing infrastructure such as shops, workplaces, schools and churches, making them more acceptable to the families who are being targeted with affordable housing provision.

We urge our County Councillors to reconsider.

[redacted]

Archived: 09 March 2025 08:21:02
From: [redacted]
Mail received time: Mon, 25 Nov 2024 00:09:18
Sent: Mon, 25 Nov 2024 00:08:18
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Additional objections
Importance: Normal
Sensitivity: None
Attachments:
Video.mov;

With the Monnow, Wye and Trothy in flood where is this water at the site of Dixton Road supposed to go?

Sent from my iPhone

3315

David Thomas

[redacted]

From: [redacted]
Sent: 24 November 2024 16:26
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Response to RLDP CS0270

Dear Sirs,

I write to object about the inclusion in the RLDP of site CS0270 (Dixton) at Monmouth.

As a resident I am strongly AGAINST this development. The reasons are as follows:-

1. Major traffic congestion. The proposed 270 dwellings are likely to add at least 400 additional vehicles a day (a conservative estimate of fewer than 2 vehicles per property) attempting to access the Dixton roundabout. I routinely have to queue to enter this roundabout in the mornings and find that it causes a major delay in my journey. Along with the Monmouth traffic lights, it is the worst delay along the entire route from the M5 Midlands to the M4 Newport. Monmouth firstly needs an improved road before considering adding extra traffic. As Monmouth has no rail service and the bus service is poor, car journeys are the only option for most families.
2. Pollution. The waiting traffic, including heavy goods vehicles, is stationary for enough time to add greatly to the air pollution levels in this area. It is unacceptable to have this adjoining the two major schools in town.
3. After many years of campaigning, Monmouth eventually has a new Welsh language primary school located in Overmonnow. As any large development of houses invariably attracts a high proportion of families with children, it would make sense to locate them near the primary schools. The Dixton site is the furthest away from these schools. You have identified another candidate site (CS0274) at Wonastow Road which would far better suit the needs of these young pupils. It would be a travesty to deny pupils the opportunity to learn Welsh because you have approved new houses at the furthest point away from the school. It would also add to the traffic as parents are likely to drive to the location.
4. As a member of the Wye and Usk Foundation, I am well aware of the greatly increased amount of pollution entering the River Wye. Not only is there a problem with high levels of phosphates, which would be exacerbated by the addition of 270 houses at Dixton, but there is also a risk from cryptosporidium which is prevalent in the river, and this has already caused the Drinking Water Inspectorate to issue two notices for the need to upgrade the Treatment Works. This will not be signed off until 2030. This would also increase the threats of infection to the school pupils who almost daily use this stretch of river which is upstream of the Treatment Works for their rowing sports. Again, the proposed site at Wonastow would be better as it would be below the rowing area and not add to the risks to pupils from polluted water.
5. My training as an Agricultural Economist leads me to disagree with the need to build houses on food-producing agricultural land. Site CS0270 has 80% of Grade Two prime land. This farming land should not be threatened.

In conclusion, I am astonished that land at Dixton is being considered. The alternative site at **Wonastow Road (CS0274)** is a far better option in dealing with the above problems.

Yours,

[redacted]