



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit
Representations Register

Volume 11 - Private Individual



monmouthshire
sir fynwy

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Conor Hapgood

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From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 17:01:23

Sent: Mon, 16 Dec 2024 17:01:04

To: [MCC - PlanningPolicy](#)

Subject: Proposal CS0232

Importance: Normal

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Attachments:

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

Hi,

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.



This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

Welsh Government Planning Policy

Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.

Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.

Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

Public Transport

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

TAN 6 - Planning for Sustainable Rural Communities (July 2010)

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

Local Develop Plan Manual (March 2020)

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

MCC LDP Preferred Strategy (December 2022)

Page 26, paragraph 4.6, 3rd bullet point:

• *Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

Objectors comment

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

4.8 The scoring system is based upon the three principles.

4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
 - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
 - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

Table 1: Scoring System for Sustainable Transport and Accessibility

Active Travel	
Presence of Active Travel Routes within the Settlement	
Several Routes	10 points
One Route	5 points
No Routes	0 points
Walking distance to a higher order settlement via active travel route	
1.5 miles	1 point
Cycling distance to a higher order settlement via active travel route	
3.0 miles	1 point
Bus Services	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning

Figure 9: The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.

Objector's comments:

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

Green - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

Amber - Tiers 3 and 4 have a lower level of sustainability

Red - Tiers 5 and 6 are the least sustainable

Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

Settlement Cluster Analysis

Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
 - The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
 - The cluster should contain Settlements from Tiers 1 to 4.*
 - Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement's social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.

Objector's comments

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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Tier 1 – left out – not relevant

Tier 2 - left out – not relevant

Tier 3

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
St Arvans	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
Pwllmeyric	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
Mathern	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

Tier 4 – left out – not relevant

SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that *'Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

Principle 3 – Employment opportunities

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

Transport Hierarchy and Conclusions

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

Other comments on the suitability of the housing allocation HA18 in Shirenewton

Heritage

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

3642

Craig & Sarah Wallace

From: [REDACTED]
Mail received time: Sun, 15 Dec 2024 11:34:57
Sent: Sun, 15 Dec 2024 11:34:23
To: [MCC - PlanningPolicy](#)
Cc: [REDACTED]
Subject: Dixon Road Development objection
Importance: Normal
Sensitivity: None
Archived: 15 February 2025 11:49:16

Dear Sir or Madam

I hope you are well?

I am writing to you to raise our concerns about the plans for the proposed development of 270 houses on the Dixon Road. I must protest at this plan for the following reasons;

1. I feel the traffic in and out of Monmouth these new houses will bring excess air pollution and extra traffic to an already congested area. [REDACTED] and we feel that this will not be beneficial to the residents at all and we are very concerned about the extra cars on this road. Especially during the school run.
2. We also feel that this will bring even more pollution to our suffering River Wye. The Wye already is over polluted with Phosphates and not to mention we feel the excess water will result in an increased surface water run off with increased risk of flooding, extra traffic congestion, pollution and environmental problems to an already suffering area of outstanding national beauty.
3. We are also concerned about the loss of productive high grade farmland and we feel this development will threaten our loss of habitat for endangered greater horseshoe bats.

We therefore feel due to its location away from the river that a more suitable site would be on the Wonastow Road away from these issues and that would solve the problems above.

Yours Faithfully

[REDACTED]

Sent from my iPhone

3643

Daniel Moore



**Office
Use Only**
Representor
Number

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.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website:

www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to:

planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadry, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

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.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		
Job Title:(where relevant)		
Organisation: (where relevant)		
Address:		
Telephone No:		
Email:		



Part 2: Your Representation

**Office
Use Only**
Representor
Number
.....
.....
.....
.....

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:



Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:

X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

P 6.4.9: Within Shirenewton / Mynyddbach there are several existing approved planning applications. It is not clear whether these have been included. Given historic approvals these should meet the overall objectives of the plan and therefore the contribution of the settlement.



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

Is your representation in support or objection?

Support:

Objection:

X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

P 7.1.3: I do not believe this policy has been applied appropriately to some of the Main Rural Settlement sites in terms of housing density and impact on landscape, heritage etc.

Levels of density proposed are greater than form, bulk, size and scale or both the existing settlement and surrounding countryside.

Selected sites (HA18 / CS0232) would have a significant impact on landscape, heritage, biodiversity, and dark skies.





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

Is your representation in support or objection?

Support:

Objection:

x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

8.2.1: The site selections (HA18 / CS0232) do not consider options of smaller developments within a settlement. This may be a result of point F regarding infilling but in some cases, this may be the most sensitive approach to the existing settlement.

8.3.2: Site selections (HA18 / CS0232)) do not seem to have consistently taken this into account, particularly Light and Noise pollution, particularly for main rural settlements.

8.6.4: This policy has not been consistently applied to site selection (HA18 / CS0232) particularly regarding important views in, and out, of conservation areas and vistas within and out of the area





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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

**7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?
(Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

Support:



Is your representation in support or objection?	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. 10.3.3: LC21- This has not been adequately applied to site selection (HA18 / CS0232), particularly in terms of causing significant visual intrusion, creating adverse change in the character of the built of natural landscape, and being insensitively and unsympathetically sited within the landscape.		

8. Do you have any comments on the infrastructure policies? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	X
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		



11.2.2: There should be reference to ensuring access to Fibre Broadband to ensure sufficient bandwidth for any development so that there is no detrimental impact on existing properties.

**9. 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)**

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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





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

Is your representation in support or objection?

Support:

Objection:

X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

14.1.3 S8: Some of the principles within this policy have not been applied to site selection (HA18 / CS0232), particularly regarding sustainable communities, highways and education

- Site selections are like to have significant impact on key views and wider landscape setting
- Local need for mixed housing has not been defined clearly
- Proposed density is not aligned to existing settlements
- No details of highways impact have been published or mitigated and sites are likely to adversely affect the safety, capacity and operation of the network

Policy HA18 / Site CS0232

I have concerns relating to this proposed site across several policy areas, and general concerns about the sites adverse impact in a number of areas. I also have specific concerns regarding the shortlisting and selection process of sites within Shirenewton.

Policy HA18 / Site CS0232 – Alignment to RLDP Policies:

Having reviewed the policies set out in the RLDP I am opposed to the proposed site set out in Policy HA18. Any development is unlikely to achieve the stated aims and criteria of the policies. As such it should not be allocated within the RLDP.



Policy OC1 - New Built Development in the Open Countryside:

- The proposed location, size and scale does not meet the criteria set out in this policy.
- Any development will have an unacceptable adverse impact on the landscape, heritage, biodiversity, dark skies, and local amenity value. For example, the Candidate site consultation stated Glamorgan Gwent Archaeological Trust assessed the site as RED.
- It will impact key views entering and exiting the village/conservation area impacting the character of the open countryside.

Policy PM1- Well-designed places:

- The proposed density would not contribute towards a sense of place and identify. The scale, amount, mix of use and density of development is not compatible with the local context.
- The location of the site will have a negative impact on local distinctiveness and landscape character given natural views and panorama are present. This would also affect panoramas from Itton Common direction.
- There is potential for considerable impact on privacy and amenity of occupiers of existing properties adjacent to the site.
- The number of dwellings proposed would suggest overdevelopment and would be insensitive to the existing settlement, particularly given the elevated position of the site.

Policy PM2- Environmental Amenity: The proposed size of development would disproportionately impact light and noise pollution given density and size compared to existing settlement. Both would also impact on natural habitats for animals such as bats which are present in the area.

Policy LC1- Landscape Character: The proposed development would have a significant impact on landscape character. It would cause significant visual intrusion, significant adverse change in the character of the landscape, is insensitively sited (due to prominence on entry and exit of the village and combined with elevated position), and the density would not respect dark skies. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low-level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements. A previously proposed candidate site which also lies to the west of the village but on the opposite side of the road is not progressing as significant concerns were raised in relation to heritage impact. Those should equally apply to this candidate site.



Policy LC5: Dark skies and lighting: The size of the development and elevation of the site is likely to create additional lighting that will adversely impact the visual and landscape character of the local environment, negatively affect dark skies and will have an adverse impact on biodiversity / ecological environment. There are a significant number of bats present in and around the site who could suffer from loss of habitat.

Policy NR3: Waste Water: There is a known issues with drainage at the site, and throughout Shirenewton. This site would pose an unacceptable risk to future flooding in relation to drainage and sewerage. This was highlighted in the previous consultation.

General concerns regarding the site:

In addition to lack of alignment to RLDP policies there are other reasons why the site is not suitable:

- **Exposure:** The site is significantly exposed and will be subject to high-winds and poor weather given there is no protection between the site and the Severn. There are alternative sites with better protection. This is more significant given the rise in storms and bad weather.
- **Traffic and highways:** The access onto Earlswood road is unsuitable. Traffic will be funnelled through the village exacerbated by a single lane road between houses leading into the village. This is already congested at peak times, and is frequently used by heavy goods and farm vehicles. More traffic would pose a significant risk to children walking to school and residents walking around the village. The junction at the Tredegar Arms cannot take additional traffic. The site has an highways impact greater than other discounted sites so should not be progressed.
- **Village boundary:** It lies outside the current defined village envelope. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. This site is part of that green belt and should remain for farming/agricultural use, and be excluded from the proposal to extend the current village development boundaries.
- **Site housing allocation excessive:** The proposed housing allocation (26 houses) is c.10% of the existing housing stock in the village. This is excessive when compared to other rural settlements. The village could meet a fair share contribution through existing permissions.
- **Car use:** Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages



(identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.

- **Conservation area concerns:** Shirenewton is a designated conservation area. Council policy states that developments must preserve or enhance the villages historic and rural character. A development of this scale will fundamentally alter the character of the village and is not in-keeping with its surroundings.
- **Local infrastructure:** The village does not have the infrastructure to support a significant population increase. Broadband isn't in place and we are subject to frequent power cuts (at least once a month) and more recently lost water for over 24 hours.

Specific details of the policy HA18:

- There is an inconsistency between the policy on page 366 and the details in p150. P366 does not include detail regarding a new footway link to the north of the site connecting to the existing Public Right of Way 380/42/1. The section on public right of way connections is TBC. This would be a critical feature to enable safe passage to school. However, it should be noted that this path is not suitable for year-round use.
- P150 does not include reference some of the detail regarding green infrastructure on p366 – e.g. community orchard etc.
- The Policy should include more detail regarding impact on adjacent properties. Assumed point B refers to this but think this could be stronger / more explicit. This could also refer to green infrastructure
- It is not clear in the documents on the final size and location of the proposed development site as the original site presented was larger. Given level of flexibility in the plot size there may be an opportunity to reduce impact on neighbouring properties and reduce housing density by increasing plot size slightly and building in a buffer/green infrastructure.

Concerns regarding Site Selection process and ability of other sites to better meet the policy requirements:

I have concerns regarding the selection process of this site. Notwithstanding general concerns regarding overdevelopment other discounted sites would better meet the policies set out in the RLDP or were discounted based on the same level of evidence.

- Other sites were discounted solely on Heritage Impact when the evidence suggests that this site would have an equal impact.
- Other sites have better access to the school without the need to provide additional routes across neighbouring sites to link to the existing network.
- Other sites (CS0240) have been discounted solely on highways impact. Highways assessments have been provided. Discounted sites have an equal level of concern as the selected site (CS0232) – therefore this site should also be discounted due to



highways impact. Similarly the highways assessment for CS0240 stated that the scheme could be implemented from a highways perspective suggesting it has not been fully taken into account. The selected site has a greater impact on both highways and the existing settlement given traffic will be required to pass through the village, rather than exit directly onto a road leading out of the village. The selected site would also exit onto a busier road than CS0240 and leads to a narrow single lane road flanked with houses with limited passing places and is also a key pedestrian route. Increasing traffic in the village will negatively impact people's ability to walk locally and also children accessing the school and recreation facilities (hall and playground).

- Other sites (e.g. CS0208) have been discounted solely on heritage grounds. Published evidence of heritage impact was equal to that of the selected site. Therefore, the preferred site should be discounted on similar grounds.
- Other sites have been dismissed without full consideration (CS0244) or dismissed on grounds where the impact is equal/greater than the selected sites. These could meet the requirements of the plan, better meet the policy requirements and do not have some of the challenges associated with the selected site resulting in a more viable scheme. This includes:
 - o highways impact: CS0244 can exit directly onto B4235 leading to the main settlements (e.g. Chepstow and Usk) and the Severn Bridge. This would significantly minimise impact on the village as other sites would push traffic through village centre impacting pedestrians and other road users. The proposed site has a significant impact on the village road infrastructure.
 - o Visual and landscape impact: CS0244 is set lower in the landscape than the proposed site. This would preserve the views in and out of the conservation area. It would also preserve local distinctiveness and landscape character in terms of natural views and panoramas.
 - o Exposure: CS0244 is much more sheltered than the proposed site reducing negative impacts of high-winds and other conditions. The storms in Q4 2024 have shown how exposed the selected site would be to high-winds and could cause significant damage to any new dwellings.
 - o Education: CS0244 is within reasonable walking distance to a school, whereas the proposed site is not.
 - o Settlement alignment: CS0244 did not progress based on the rationale that 'there is better and more suitable land within the Main Rural Settlement'. The selected site (CS0232) is also outside the main settlement. Therefore, this rationale is not clear or evidenced, particularly given the points outlined above regarding issues with the selected site and impact on landscape etc. This suggests that full consideration has not been given and that CS0232 should also be discounted on the same grounds.



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



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

Is your representation in support or
objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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





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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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



Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

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





Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	
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)? ☒	
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):		
Fails test 2		
I believe that the RLDP fails this test on a number of grounds:		
Is it supported by robust, proportionate and credible evidence? No. while there is a lot of evidence throughout site selections have not been selected based to achieve the policies set out in the plan. In the case of HA18 evidence has not been provided in relation to highways impact and other sites (in Shirenewton and elsewhere) have greater ability to meet the objectives of the plan.		



- Can the rationale behind the plan's policies be demonstrated? No. The need to 50% affordable housing on a number of schemes has not been supported in terms of demand.
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development? No. Site selection in rural settlements
- Have the 'real' alternatives been properly considered? No. The Plan has not considered alternatives in a number of ways.
 - (1) Many sites in Shirenewton were discounted based on insufficient information demonstrating deliverability of the scheme (e.g. CS0225); this suggests that alternatives have not been explored fully, particularly given the limitations associated with the selected site in (HA18). To fully consider alternatives this evidence should have been explored.
 - (2) The scheme in general focuses on selecting a single site within settlements rather than exploring several smaller sites to meet the needs of the plan. Developing smaller sites is likely to have a lesser impact on existing settlements and would be in-keeping with the current structure of the village.
 - (3) It is not clear how existing planning permissions have been taken into account to help the policy meet its objectives. Particularly when these could provide a fair contribution to the overall scheme.

Fails test 3

I believe that the RLDP fails this test on a number of grounds:

- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales? Unclear. For example, Shirenewton would require significant upgrades in terms of internet, drainage, highways and power. The village has frequent power cuts and problems with flooding as a result of poor drainage were identified at candidate site consultation stage.
- Can the sites allocated be delivered? No. (please refer to comments in section 10). Sites such as in HA18 are unlikely to be viable given limitations of the site and its inability to meet policies set out in the RLDP. More suitable sites are available but have been discounted. Furthermore, the infrastructure of the village, especially in terms of roads, cannot take additional development of the size and scale outlined in the Plan (HA18).

Policy HA18 / Site CS0232 – Alignment to RLDP Policies:



Having reviewed the policies set out in the RLDP I am opposed to the proposed site set out in Policy HA18. Any development is unlikely to achieve the stated aims and criteria of the policies. As such it should not be allocated within the RLDP.

Policy OC1 - New Built Development in the Open Countryside:

- The proposed location, size and scale does not meet the criteria set out in this policy.
- Any development will have an unacceptable adverse impact on the landscape, heritage, biodiversity, dark skies, and local amenity value. For example, the Candidate site consultation stated Glamorgan Gwent Archaeological Trust assessed the site as RED.
- It will impact key views entering and exiting the village/conservation area impacting the character of the open countryside.

Policy PM1- Well-designed places:

- The proposed density would not contribute towards a sense of place and identify. The scale, amount, mix of use and density of development is not compatible with the local context.
- The location of the site will have a negative impact on local distinctiveness and landscape character given natural views and panorama are present. This would also affect panoramas from Itton Common direction.
- There is potential for considerable impact on privacy and amenity of occupiers of existing properties adjacent to the site.
- The number of dwellings proposed would suggest overdevelopment and would be insensitive to the existing settlement, particularly given the elevated position of the site.

Policy PM2- Environmental Amenity: The proposed size of development would disproportionately impact light and noise pollution given density and size compared to existing settlement. Both would also impact on natural habitats for animals such as bats which are present in the area.

Policy LC1- Landscape Character: The proposed development would have a significant impact on landscape character. It would cause significant visual intrusion, significant adverse change in the character of the landscape, is insensitively sited (due to prominence on entry and exit of the village and combined with elevated position), and the density would not respect dark skies. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low-level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements. A previously proposed candidate site which also lies to the west of the village but on the



opposite side of the road is not progressing as significant concerns were raised in relation to heritage impact. Those should equally apply to this candidate site.

Policy LC5: Dark skies and lighting: The size of the development and elevation of the site is likely to create additional lighting that will adversely impact the visual and landscape character of the local environment, negatively affect dark skies and will have an adverse impact on biodiversity / ecological environment. There are a significant number of bats present in and around the site who could suffer from loss of habitat.

Policy NR3: Waste Water: There is a known issues with drainage at the site, and throughout Shirenewton. This site would pose an unacceptable risk to future flooding in relation to drainage and sewerage. This was highlighted in the previous consultation.

General concerns regarding the site:

In addition to lack of alignment to RLDP policies there are other reasons why the site is not suitable:

- **Exposure:** The site is significantly exposed and will be subject to high-winds and poor weather given there is no protection between the site and the Severn. There are alternative sites with better protection. This is more significant given the rise in storms and bad weather.
- **Traffic and highways:** The access onto Earlswood road is unsuitable. Traffic will be funnelled through a single lane road between houses leading into the village. This is already congested at peak times, and is frequently used by heavy goods and farm vehicles. More traffic would pose a significant risk to children walking to school and residents walking around the village. The junction at the Tredegar Arms cannot take additional traffic. The site has an highways impact greater than other discounted sites so should not be progressed.
- **Village boundary:** It lies outside the current defined village envelope. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. This site is part of that green belt and should remain for farming/agricultural use, and be excluded from the proposal to extend the current village development boundaries.
- **Site housing allocation excessive:** The proposed housing allocation (26 houses) is c.10% of the existing housing stock in the village. This is excessive when compared to other rural settlements. The village could meet a fair share contribution through existing permissions.
- **Car use:** Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists



(and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.

- **Conservation area concerns:** Shirenewton is a designated conservation area. Council policy states that developments must preserve or enhance the villages historic and rural character. A development of this scale will fundamentally alter the character of the village and is not in-keeping with its surroundings.
- **Local infrastructure:** The village does not have the infrastructure to support a significant population increase. Broadband isn't in place and we are subject to frequent power cuts (at least once a month) and more recently lost water for over 24 hours.

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.

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:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

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?

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?



Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024**) will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness

Preparation Requirements:

- Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?)
- Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)



Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?



New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: <https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/>
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: <http://www.monmouthshire.gov.uk/your-privacy/your-council>

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

3644

Mr David Cantle



**Office
Use Only**
Represent
tor
Number

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.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website:

www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024.**

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to:

planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadryr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024.**

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

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.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		
Job Title:(where relevant)		
Organisation: (where relevant)		
Address:		
Telephone No:		



Email:



Part 2: Your Representation

**Office
Use Only**
Representor
Number

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:





Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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





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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



**7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?
(Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



**8. Do you have any comments on the infrastructure policies?
(Policies S6, & IN1)**

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

**9. 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)**



Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	YES
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Policy S8, Area HA4 - Leasbrook		



Sustainable Communities

I don't agree that this settlement is particularly well connected. Unfortunately, the Dixon Road roundabout is a significant traffic pinch point for vehicles leaving this part of Monmouth. This combined, with the narrow and in places, single lane vehicular access in the centre of Monmouth means there is no straightforward way to access main road networks or the main car parks in Monmouth centre at peak times, without significant delays to travel journeys and the other adverse conditions such as air pollution which are a side effect of this problem. In order to make this settlement better connected without causing challenges for both existing residents or new residents, I would suggest implementing the following improvements to the plan –

- Direct vehicular access on to Hereford road, offering residents more options for attaining access to the wider traffic networks
- An alteration to the Dixon road roundabout, to increase the priority for vehicles leaving New Dixon Road on to the A40. This could be in the form of:
 - automatic traffic lights which prevent traffic entering the roundabout, North and South on the A40 to allow traffic to move out from the New Dixon Road
 - creating an extra slip road such that vehicles from the Dixon road can access the North Bound side of the A40 without the need to queue at the roundabout.

However, even with the above changes, this site will still have greater access challenges than the other previously proposed site at Wonastow (CS0274) which I believe already has a suitable access road and better access to both the key amenities within Monmouth and on to the A40 which is the main commuter route. The foreseeable build up of traffic, from the construction of this new site at the Leasbrook location will result in a number of other issues which I will touch on later, but it is also important to note that the New Dixon Road is already subject to significant periods of standing traffic. The most recent major incident occurred only this week on Tuesday 10th of December, where people stuck in stationary vehicles actually resorted to reading newspapers.

Further to this, due to the location of this development, it is hard to envisage the housing stock being truly affordable. Currently the house prices within this part of Monmouth are much higher than the other proposed site of Wonastow. It is key that 50% are affordable and I think, not just by the government definition, but actually realistically affordable for the average young person or couple if we are to ensure that that we want to counteract the aging demographic. Wonastow road is a much more sensible place for this considering the expected greater affordability.

Green Infrastructure, Landscape and Nature Recovery

In terms of this topic, my main concern is around the habitat and sustenance zone of the horseshoe bat. I am not convinced that the proposed corridor will adequately compensate



for the general loss of farmland and this development is likely to result in the decline of the species. A further concern around this is the enforceability of the plan. i.e. ensuring that the developers meet requirements as outlined. I have seen too many examples of developers not providing promised infrastructure and councils failing to hold them to account so I would like to see legal contract to ensure that developers suffer severe penalties should they fail to adequately provision for the horseshoe bats in particular. If this cannot be done, I don't see how this site can be considered acceptable.

Further to the direct habitat issue above, the run-off to the river must also be considered. I will discuss below in the sustainable drainage section why I think that the SUDs proposed, are inadequate, but here would like to cover the environmental issue that this contention poses. This site will result in increased phosphate pollution in an already 'dead' river. Again this should surely be a case of either fixing the river before building a large additional settlement with direct run-off into the river, or building a suitable settlement with a drainage solution which suitable captures polluting nitrates, preventing further degradation of what should be a primary local ecosystem and tourist attraction. The state of the river currently is frankly, disgraceful and as such I believe any threat of additional harm should have to overcome a very high bar in terms of proof of not adding to the problem before being granted. I can't see how this is even close to being achieved by the developer in this instance.

Sustainable Travel and Highways

A key part of this section in the HA4 section of the report, is the acknowledgment that there needs to be emergency vehicular access from the Hereford road in the event of an extreme flooding event. The concern here, is that from a planning perspective much of the Dixon road and near the proposed development and the proposed development itself are in development zone C1 with the aforementioned key roundabout being in zone C2, this seems like a crazy place to build a settlement as large as that proposed without significant consideration to the lack of current infrastructure in place. There are a number of houses that exist along Dixon road, including our own which could be adversely affected by the construction of the proposed settlement. My house is currently Flood zone 3 on the planning map. Earlier this year, during the high rain fall, the road drains were completely full and we had surface water coming down our driveway and pooling around our house. Ultimately if we can't trust the council to maintain these drains adequately to prevent this type of incident, how can we trust that the impact of this huge settlement will not adversely affect the existing houses already at risk. I have seen no plan to adequately address the challenge of the capacity of the sewer system within the area. Our house is on a septic tank due to issues with the drainage and as such I do not see how it is reasonable to build 270 new houses without providing adequate infrastructure for those already existing. The other proposed location at Wonastow road has a far lower risk around flooding and as such, without sorting out the issues as listed around the Dixon road area, this should be an obvious choice of site over the proposed site.

Residential amenity



The main area, I'd like to highlight here is around air quality as previously mentioned. It is hard to envisage a situation with the proposed development where the air quality won't significantly deteriorate. The surprise at the considered site, considering the traffic on the A40 roundabout off the New Dixton road has been widely publicised and with the vast majority of the anticipated 405 vehicles, leaving the area via this route and the subsequent delays caused, will result in significant stationary traffic within the area. As, stationary traffic on the New Dixton Road is already an issue which results in significant localised pollution, again this seems like a poor proposal which considers no mitigations to this ongoing and increasing problem.

Further to the points directly listed in the policy, there is also a key point to be made here around drinking water quality. Monmouth's drinking water source already has two warnings from the drinking water inspectorate including risk of cryptosporidium. As the necessary treatment upgrade won't be completed until 2030 (and of course this is not guaranteed) it feels reckless to add 270 houses to this area which will put further strain on the local drinking water supply.

Flood Risk and Sustainable Drainage Systems

Continuing from the previous section on Sustainable Travel and Highways around flooding, I also have a concern around the proposed SUDS which do not offer adequate mitigation to the potential of flooding from surface water run-off considering the partially permeable land that will be replaced with less permeable land and houses, resulting in greater run-off towards houses closer to the river such as my own. It has been highlighted and can be confirmed by some simple research, that SUDS are not a suitable drainage solution where clay soils are present. As such, the current plan does very little to protect the existing residents from increased surface water flooding, leaving residents with the double threat of significant and increasing risk from the river and increased risk from surface water which is in direct contravention of RLDP objective 4.

Alternate site

As previously mentioned, an alternative site has been offered at Wonastow road (CS0274) which offers much more in terms of employment and is much better located for easy road access to town as and is better from an environmental perspective, being downstream from Monmouth's drinking water source and being generally less environmentally sensitive and outside of the key bat area. This area also has better soil for potential drainage. The main negative I can think of is greater distance from schools, but the best feature of schools from a planning perspective, is that typically most school children start and finish their day at the same time and as such, could be served effectively by a bus from this alternate site which could further benefit the local community by offering additional public transport across Monmouth town for local people.



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).



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

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

Is your representation in support or
objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP
your representation relates to and include any comments in this box (please use additional sheets
as necessary).

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





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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

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



Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

16. Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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



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

Is your representation in support or objection?

Support:

Objection:

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

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





Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	No
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)? ☐	
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 specifically fails in the area of policy S8-HA4. I have made a number of comments in the site location section of this form related to S8-HA4 (Question 10). The simplest improvement would be to change the site to the alternative proposed location at Wonastow road, CS0274 from the proposed site at Leasbrook (CS0270). However, I have also suggested some improvements for the current site, although it is my belief that these improvements alone would still not make this proposed location able to pass test 2.		



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.

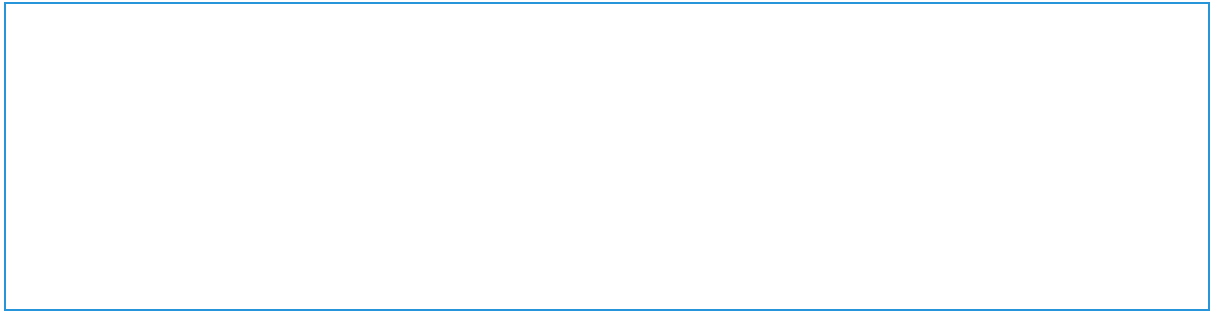
Please indicate below if you would like to speak at the public examination.

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:	YES
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	YES

Part 5: Welsh Language

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?

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?





Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024**) will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness

Preparation Requirements:

- Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?)
- Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)



Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?



New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: <https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/>
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: <http://www.monmouthshire.gov.uk/your-privacy/your-council>

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

3645

David Hing

[REDACTED]

From:

Sent:

[REDACTED]
13 December 2024 13:01

To:

MCC - PlanningPolicy

Subject:

RLDP Consultation Response Site HA4

I would like to register my absolute objection to your plans to build 270 houses off Dixon Road, Monmouth. Your plans to tear up a green farming pasture instead of utilising an already developed brownfield site is scandalous and you should be ashamed of yourselves for even contemplating the destruction forever of our habitat and clean open space to meet a dubious government target.

[REDACTED]

3646

David Milliken

Archived: 15 February 2025 11:51:34

From: [REDACTED]

Mail received time: Thu, 12 Dec 2024 23:17:34

Sent: Thu, 12 Dec 2024 23:17:18

To: [MCC - PlanningPolicy](#)

Subject: Large housing development portskewett

Importance: Normal

Sensitivity: None

I strongly object to this massive development. I object on a number of grounds :

Flooding risk :there is no evidence that this further development on flood plain will not increase the flooding risk to the Caldicot Castle area. Where is the hydrology study. It is accepted that we live in much wetter times and the castle area is prone to flooding. It was bizarre that one councillor remarked the property was planned on higher ground so no risk of floods. What a ridiculous comment. The rain falling on the higher ground will now land on concrete and tarmac. This will cause run off, with natural ground that absorbed water now gone. The run off downhill will inevitably gravitate to the castle increasing the flood risk to Castle Lea and castle Lodge. Is the council going to indemnify residents for increased flood risk and undertake to install and maintain flood prevention measures.

Secondly this is major development on the levels, with its rich diversity. Has there been any environmental impact study been done?

Thirdly the area concerned has extremely poor access to public transport which will mean that cars will be a significant feature. What studies have been done to assess the likely carbon footprint? What steps will be taken to substantially improve public transport?

[REDACTED] and this will significantly aggravate the chronic traffic problems around the high beech roundabout

Finally and I'm sure of no concern to the planners will be the effects on local services of this development. I can see a school is being built but that does not include additional resource for post 11 years education. Gp services are already struggling and this development could add thousands to lists and the development would at worst pose a risk to public health, which is the council's responsibility

Yours [REDACTED]

3647

Deborah & Nick Edwards

From: [REDACTED]
Mail received time: Sat, 14 Dec 2024 12:20:04
Sent: Sat, 14 Dec 2024 12:19:43
To: [MCC - PlanningPolicy](#)
Subject: RLDP Consultation Response Site HA4
Importance: Normal
Sensitivity: None
Archived: 15 February 2025 11:58:33

We are writing to voice our concerns relating to the proposed development [REDACTED]

It would appear that very little thought has been given to preserving the privacy of affected residents on Hereford Road - we were told that shrubs would be planted along our boundary which will hardly address the issue. There is also the concern of light, air and noise pollution.

The area has been identified in the Monmouthshire LLCA as being of high sensitivity - the site would be visible from Dixon Mound and also has a high historical landscape sensitivity. The site also lies close to the Wye Valley National Landscape (an AONB), which is a protected landscape, conflicting with planning policy.

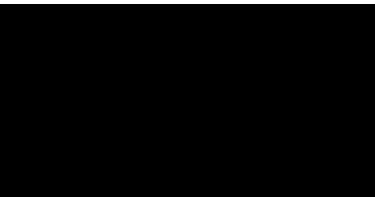
The Greater Horseshoe Bat is frequently seen in our garden and the site would have a negative impact on the environment with loss of habitat. The site is within the sustenance zone for these endangered bats which rely on grassland and hedgerows. This is prime agricultural land.

The site is prone to flooding. Rain runoff pollution would contaminate the River Wye about 400m upstream from Monmouth's drinking water intake and would increase phosphate levels in the river. The site has clay soil and the proposed drainage system, SuDS, is unsuitable for phosphate removal. The River Wye already has two warnings from the Drinking Water Inspectorate, including Cryptosporidium risk. The sewers are already at capacity with regular sewage discharges into the Wye. We have suffered stomach problems and now buy our drinking water.

The site would increase traffic congestion. A minimum of 270 extra vehicles would increase travel times. Accessing Dixon roundabout from Dixon Road is already challenging and vehicles queuing will substantially increase air pollution; nitrogen dioxide levels in the area already exceed WHO guidelines.

We question why this site has been selected when there is a far more suitable alternative site at Wonastow Road (CS0274) which is downstream from where Monmouth takes its drinking water. The soil on this site is free-draining and suitable for SuDS. It is also outside the bat zone. It is within walking distance of major employers in Monmouth and is less environmentally sensitive.

We trust that these concerns are addressed and responded to and that the alternative site at Wonastow Road is seriously considered.



Sent from my iPad

3648

Deborah Phillips

From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 22:30:50

Sent: Mon, 16 Dec 2024 22:30:32

To: [MCC - PlanningPolicy](#)

Subject: Planning policy - East of Caldicot/North of Portskewett

Importance: Normal

Sensitivity: None

Archived: 15 February 2025 12:02:24

[REDACTED]

I am writing to object to the proposed building of 770 houses in the area of Caldicot as per your plans in RLDP.

The infrastructure cannot cope with the traffic that we have already and congestion is terrible as it is. With an extra 770 houses this will just become worse. Air pollution will just get worse which will have an impact on our health.

You cannot build more houses until you have the correct infrastructure in place. We do not have enough Doctor's, dentists and decent roads as it is.

Building on the green fields will also make flooding worse as the water will not have anywhere to go. It is bad in Caldicot which will be made worse by losing Green fields. I also worry about the impact on nature and the habitat. You are also intending to build on an area of natural beauty.

[REDACTED]

3649

Miss Denise Germain

Archived: 15 February 2025 12:04:39

From: [REDACTED]

Sent: Fri, 13 Dec 2024 14:21:26

To: [MCC - PlanningPolicy](#)

Subject: Policy HA18 Land West of Redd Landes Shirenewton CS0232- Objection.

Importance: Normal

Sensitivity: None

Dear Sir/Madam,

I hope I find you well. Would you please read, and seriously consider, the reasons for my letter of objection to the above-mentioned proposal?

I cannot believe this is even being considered in such an unbecoming site. I am writing to STRONGLY object to the Replacement Local Development Plan proposal CS0232, Policy HA18, for the construction of a housing development of 26 houses adjacent to Redd Landes, Shirenewton.

Shirenewton is a small historic village with VERY NARROW lanes, NO FOOTPATHS (and no room for them), which lead to near misses and actual vehicle collisions. More cars and more small children will only exacerbate the situation. Accidents waiting to happen springs to mind. It's houses and quaint cottages are stone built. It has a beautiful medieval church, and it is set in and surrounded by rolling rural countryside. Shirenewton is one of the few unique, unspoilt villages we have left in today's world. This would be a very large estate, compared to the size of the village, and would have a severe impact on the local infrastructure and environment for current residents. It would change the whole character and spoil the village FOREVER.

The road which fronts the site is still in need of repair due to collapse and has had cones and warning signs in place for some considerable time. Such a time that they have since fallen off the road and into the hedge where they remain?! The track opposite the proposed site is used regularly by heavy farming equipment, HGV's, very large tractors and combine harvesters already. Again, add more cars and children to this and you will be increasing the risk to safety significantly and therefore the potential for MORE ACCIDENTS AND INJURIES. Also, the road from Earlswood passing the development is national speed limit, therefore has vehicles travelling at high speeds before they hit the village boundary, this would be a SERIOUS DANGER TO PEDESTRIANS AND CYCLISTS on this BENDY stretch of the ROAD, again, with no footpath. The small village school is, already, oversubscribed and the bus service is very limited, with buses only running every three hours or so. There is no shop or medical facilities so residents will need a private car to get to any of these necessities. More cars, especially these much, MUCH, heavier electric vehicles, will do even MORE DAMAGE to the little roads in the village requiring even MORE REPAIRS which the Council can't afford to do as it is.

The village is home to a wide range of wildlife, which include PROTECTED SPECIES requiring natural habitats. Buzzards can regularly be seen on the ground at this site. Loss of the green spaces and increased population and vehicles would disrupt this and take away the so very PRECIOUS BIODIVERSITY for future generations.

The proposed site is very often saturated, with insufficient run off drainage and does flood.

I therefore strongly urge the council that this proposal is REJECTED and relocated to a SAFER AREA with more amenities and BETTER LOCAL INFRASTRUCTURE for this type and quantity of housing.

Thank you for your time.



3650

Geoff Andrews

Archived: 15 February 2025 12:08:28

From: [REDACTED]

Sent: Mon, 16 Dec 2024 18:01:47

To: [MCC - PlanningPolicy](#)

Subject: Policy HA18 Land west of Reddlandes Shirenewton CS0232

Importance: Normal

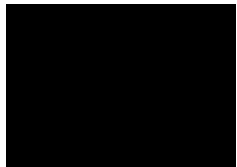
Sensitivity: None

Good evening

I am writing to express and strongly object to the replacement local development plan proposal CS0232 for the construction of 26no. houses in the adjoining field above Reddlandes in Shirenewton.

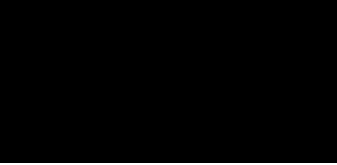
- The land lies opposite a heavily used track for farm vehicles and Lorries at the head of the village heading towards Earlswood and outside of the village envelope.
- The number of houses is extreme and will overwhelm the size of our village and produce more vehicle traffic on the B road, which is heavily used and in demand to cyclists, horse riders and all other road users.
- Limited bus services so these houses will need to have a car, and most houses have at least two cars, so there is 52 more cars at least.
- Primary school is at its pupil limit. No shops within the village.
- Infrastructure of utilities are at their limit as recently tested and found during Storm Darragh as no power and water for 36 hours.
- Village is set within a designated conservation area and is a lovely village to live in and this proposal will seriously spoil the feel and look of the village.
- The site will access onto the road where the speed limit changes from 20mph to national speed limit and is an accident (serious) waiting to happen!
- No pavement/street lighting.
- The land of late has been heavily saturated and has caused serious run off of rainwater which has flowed into the surrounding/adjoining properties and caused damage.
- By creating the number of properties and the access road and hard surfacing this will create even more of storm water run off issues which Dwr Cymru have stated the drainage is insufficient to meet any additional needs.

I therefore strongly urge the council to reject the proposal and look at a better suited area with amenities for this type and quantity of housing.



3651

Dorota Cartwright



Subject: Objection to Proposed Development – RLDP 2018-2033 – CALIDCOT/PORTSKEWETT

Dear Monmouthshire Council – Planning Department

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 impact to local residents; not only from an infrastructure point of view, but mainly from a quality of life point of view. Speaking to many locals, the appeal of the area is the quiet villages, farmlands and green scenery. The proposed development will make the area extremely unattractive to many local residents and risks losing them.

I am also concerned about the 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. 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. It is evident through the latest development in Portskewett, Elderwood, developers and construction companies give very little respect to protect environments around their sites and are not able to protect it well during the development process.

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 also very 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. Pollution around the area will significantly increase, posing a health risk to residents. There is no consideration in any plans to create the right infrastructure to alleviate the congestion associated with further housing developments. This always seems like an afterthought, just like the improvement of roads around the new Elderwood Estate, for example.

The new proposal aims to remove the David Broome Event Centre. This will be a huge loss to the community, as the centre plays an important role in the local economy, attracting visitors and competitors

from across the UK, and sometimes internationally. Events hosted at the centre often bring tourism and business to Portskewett and nearby towns like Caldicot, as visitors often stay in local accommodations, dine at nearby restaurants, and shop locally. In addition, the centre contributes to the community by promoting sport and providing a space for equestrian enthusiasts of all ages and levels to come together. The wonderful restaurant at the location would also lose its home, destroying another well loved, local business.

I find another proposal for a housing development in the area extremely surprising given how little interest has been shown in the purchase of houses at the Elderwood site. From feedback of few current residents on the site (with many plots still unsold), the houses have been poorly built, roads around too narrow and quality of living very low due to the cramped conditions.

I am also surprised at the “need” for new housing, given that the Deputy PM, Angela Rayner, herself said, in a recent interview with Sky News, that there is “plenty of housing” in the UK. This seems to be contradictory to the message from the local councils. This does make me question whether local council funds could be better used in other areas, like secondary education, given the poor reputation of secondary schools in the area? Please see link to the interview on Sky News here:

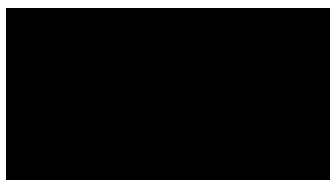
<https://x.com/SkyNews/status/1865683354089111602>

I could continue writing my essay to you outlining the impact of this proposed development, talking about the flood risk, negative impact of a traveller site on the local community, lack of facilities like GP practices, local transport, good quality schools, etc. There are many reasons that have been already discussed at local meetings and discussion groups about this proposal. I am not going to continue though as I would like you to take one main thing out of this objection



Leave our beautiful Gwent Levels to continue being beautiful.

Thank you for considering my concerns. I look forward to your response.



3652

Dr Leanne Fetta

Archived: 15 February 2025 12:13:02

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 20:12:02

Sent: Sun, 15 Dec 2024 20:11:47

To: [MCC - PlanningPolicy](#)

Subject: RLDP Policy HA18 Land West of Redd Landes CS0232

Importance: Normal

Sensitivity: None

Dear Monmouthshire County Council,

I am writing to object to the Replacement Local Development Plan proposal, **policy HA18, related to land West of Redd Landes, Shirenewton, CS0232** for the construction of a housing development of 26 houses. **This email is in response to question 10 and is to be included in the consultation.**

Shirenewton is a small, historic village, with many residents having lived here much of their lives. As such there is a strong sense of community, and the villagers maintain a quiet and peaceful lifestyle. Shirenewton is set in a designated conservation area, with stone buildings, a thriving medieval church, and rural, unspoiled countryside landscape.

Roads through the village are narrow and winding. Even the currently small volume of road traffic at times of school drop off and pick up can cause congestion, and it is impossible to pass refuse collection vehicles when they are working through the village. As the village is surrounded by farmland, tractors or other farming vehicles often need to pass through, requiring the patience and consideration of other road users. The area is popular with villagers for walks, although many of the lanes do not have pavements.

The size of the proposed residential development would be disproportionate to the current village population. Therefore, there is a risk of significant road congestion with increased residents, as well as safety and increased pollution risks for road users and pedestrians.

The infrastructure supporting the village is already not fit for purpose, with frequent electricity and water outages, and poor mobile network signal and internet supply issues. Additionally, the village and surrounding areas suffer when weather is wet with many areas becoming saturated and sections of roadways flooding, pooling or running with water.

There is limited public transport connecting the village to the main towns of Chepstow and Usk, and as the development proposed includes family homes, my assumption is new residents would require their own vehicle to ensure they are able to travel for schools, work, and all amenities (there are no shops, post office, or health care facilities nearby).

I therefore strongly urge the Council to reject this plan and consider alternative options.

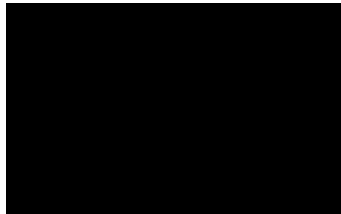
[REDACTED]

3653

Brian & Dunja Roberts

From: [REDACTED]
Mail received time: Fri, 13 Dec 2024 22:33:35
Sent: Fri, 13 Dec 2024 22:33:20
To: [MCC - PlanningPolicy](#)
Subject: RDLP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton
Importance: Normal
Sensitivity: None
Archived: 15 February 2025 12:16:16

We object to the above development because building 26 houses on an unsuitable green field site in a village with no amenities is a no no proposition surely?



3654

Elizabeth Guy

Archived: 15 February 2025 12:19:52

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 23:03:58

Sent: Sun, 15 Dec 2024 23:03:40

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: Concerns regarding the proposed housing development on Dixon Road/Site HA4

Importance: Normal

Sensitivity: None

Good Evening

I am writing to you to share my significant concerns with regards to the proposed housing development on Dixon Road/site HA4. I don't usually like to complain, but I cannot sit by and watch our beautiful town get ruined by such an unwelcome and damaging plan.

[REDACTED] and I want the best for our town and to ensure that my children can grow up in an environment similar to that which I have enjoyed.

It brings me to tears to think that the iconic view we enjoy when entering the town could be ruined by, yet another, new housing estate. The breath-taking feeling you get when passing through the gateway to Wales will be irretrievably lost.

Personally, I feel that until you can protect the town, people and houses we have, particularly from flood risk, we shouldn't be building any new houses. Until there is significant job creation, and additional amenities, I don't feel this town can cope with more houses, without eroding our children's quality of life.

But, if new houses must be built, the location on Wonsatow Road will be so much less damaging to the iconic scenes of Monmouth.

I have laid out a number of concerns with regards to the welfare of the town and its people below:

Water quality

The town is already under two notices from the Drinking Water Inspectorate, in addition to the proposed area failing phosphate targets and sewers already at capacity, together with the local treatment works regularly discharging sewage into the River Wye.

This along with increased surface run off into the river and sustainable drainage systems (SuDS) not being effective on clay soil is of significant concern. How can you possibly be considering more houses before these issues are addressed?

Traffic congestion & pollution

The proposed development of 270 homes would likely bring over 400 additional cars to the area, leading to (further) traffic issues for the town as well as us increasing out NO₂ levels even further in excess of WHO guidelines. This is of serious concern with regards to the Dixon roundabout which is already terribly congested at many times throughout the day.

Environmental concerns

The proposed site would result in the loss of high-grade farmland, a proportion of which is prone to flooding and lies very close to the Wye Valley Area of Outstanding National Beauty, a protected landscape which I understand conflicts with standard planning policy.

In addition, the site threatens the loss of habitat for endangered Greater Horseshoe Bats, being within 3km of the core sustenance zone.

Consideration of alternative sites

As I mentioned above, the alternative site on Wonastow Road (CS0274) would be a much better site for new houses and poses less significant risks to our town. This site has a number of other benefits such as:

- There are approximately 2 hectares of nearby employment land
- The National Cycle Route 423 already passes the site, with further active travel routes planned (the nearest cycle lane to HA4 is approximately 2km away)
- The site is downstream of our drinking water supply (HA4 being upstream)
- Is not in an area with phosphate targets (HA4 is such an area)
- Site is primarily lower grade 3a agricultural land (HA4 is virtually all grade 2)
- The site is not a core sustenance zone for rare bats (HA4 is in a core sustenance zone)
- Not within close proximity of Area of Outstanding National Beauty (HA4 is within 500 metres, therefore a huge negative change to the national landscape and the gateway to Wales)
- Is only approximately 5% within zone 2 & 3 flowing parameters (HA4 is three times that at approximately 15%)
- Moderate effect on traffic congestion/trunk roads (HA4 would have a high impact, due to being within 100 metres of Dixon)

roundabout, which is already a high pinch point in the towns traffic system)

Given the above, I cannot understand how CS0274 would not be a more suitable site for Monmouth and should therefore be formally considered as an alternative site if a full consultation process is being conducted to assess the most appropriate site as part of the RLDP.

I would also like to add, with a decision of such importance, I am bitterly disappointed to learn that despite requests to discuss these widely considered views at a public meeting or in person (which I understand was a commitment made by Cllr Griffiths during the Council meeting in October), we have not been given the opportunity to do so. [REDACTED]

Regards

[REDACTED]

3655

Elizabeth Larner

Archived: 15 February 2025 12:35:31

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 14:21:17

Sent: Sun, 15 Dec 2024 14:21:00

To: [MCC - PlanningPolicy](#)

Subject: RLDP Consultation Response Site HA4

Importance: Normal

Sensitivity: None

Dear Sirs

I am writing to put forward my objections to the Dixon Road, Monmouth site.

I believe that this site is inappropriate for Monmouth. The site is environmentally sensitive, traffic sensitive and historically sensitive.

The fact that the agricultural land will disappear under 270 houses should never be allowed when we are trying to feed this country without importing food from abroad. This seems to have been forgotten by the people who are in charge of changing our beautiful landscapes when the land is high grade agricultural land.

The Dixon Road development risks compromising Monmouth's drinking water from the River Wye, a Special Area of Conservation, under advisories for contaminants like Cryptosporidium. Infrastructure upgrades to handle pollutants are delayed until 2030, and surface runoff from the site during rainfall could add harmful phosphates into the river, worsening water quality. The developer's proposed Sustainable Drainage Solutions (SuDS) are insufficient for phosphate reduction due to the site's clay-heavy, poorly draining soil. Surely Natural Resources of Wales should be objecting to this. There are already two notices from the Drinking Water Inspectorate.

Traffic congestion will be even worse than it is now with delays at certain times of the day, early morning, between 2 and 3 with the schools and then rush hour.

Also a mention of schools, where are the children, who will be occupy these houses, going to go school. I have heard that the comprehensive has reduced its catchment area as they are now at capacity.

The site is within the Landscaping setting of the Wye Valley AONB and I understand that Planning Authorities have a statutory to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas.

Major developments should not take place except in exceptional circumstances. The development of housing on the Dixon Road is not an exceptional circumstance, as an alternative site is available on the Wonastow Road.

As I have said above, an alternative more suitable site at Wonastow Road, Monmouth (CS0274) is available yet overlooked by the Council. We support affordable housing in Monmouth, but we believe it should be in the right housing, in the right place, with the right infrastructure.

I would appreciate it if you could respond to the consultations and encourage any relevant bodies to review this decision.

Monmouth is the jewel in the crown of its surrounding countryside. We need to preserve Monmouth's unique character for future

[REDACTED]

3656

David Nicholson

Archived: 08 March 2025 09:43:27
From: [REDACTED]
Mail received time: Sun, 15 Dec 2024 22:38:43
Sent: Sun, 15 Dec 2024 22:38:25
To: [MCC - PlanningPolicy](#)
Subject: [REDACTED] OBJECTION TO MOUNTON PLANS
Importance: Normal
Sensitivity: None

For the attention of [REDACTED]
planningpolicy@monmouthshire.gov.uk

Name	[REDACTED]
Address	
Job title	
Telephone number	
Email	

[REDACTED] are emailing to object the MRLDP regarding the LAND at
MOUNTON ROAD, Chepstow

Please make it known that to make an objection online to the below questions is not Deaf Friendly i.e. not in plain English and certainly not user friendly for the general public.

We have had to seek support in how to write this objection with no direct support from MCC. The engagement sessions are one way.

The decision to email is to hope that one member can express the objections on behalf of with the rest of the residents (due to struggling to fill in the questionnaire online)

We will do our best to make it concise and clear.

Our wellbeing is not considered only that of the for future generation.

The current infrastructure cannot cope with more people, health (GP are full and oversubscribed. The Grange Hospital cannot cope with current numbers of people, the A&E is unsafe with long waiting hours and treatments – this makes us fearful and in constant worry that the eldest resident’s life is at risk should he need assistance from the NHS, and ambulance service. We have had personal experiences of the waiting times. More residents in the specific Mouton area and as well as other areas in Monmouthshire will impact our overall health and unnecessary illness and premature deaths. The health service is the Welsh Government’s responsibility however councils are funded by the Welsh Government and have to adhere to all the acts in Wales particularly to current people who reside in the areas.

The traffic in the area has increased over the last twenty years that we have lived in this address. There are information below describing key issues that state our reasons for objects. (noise pollution, air pollution, light pollution, safety of pedestrians in the area cycling and walking. The list goes on but we hope that this summary will support our objection clearly)

May we please note that we are aware the majority of councillors who supported these outlines for plans, do not live in this area and will not directly suffer.

The Green space belongs to the community and residents of Wales.

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This statement from [REDACTED] back in 2013 still stands as nothing has changed.

'It was agreed by the council that Chepstow's infrastructure could not take many more residential dwellings.

Housing developer Taylor Wimpey, has applied for outline planning permission to build up to 200 dwellings, highway access, open space and landscaping on land at Mounon Road.

Councillor [REDACTED] said: "Chepstow hasn't got the facilities to cope with this amount of residential dwellings. If we support planning permission then we will be letting Chepstow and its residents down.'

"We need to think about the new families coming to live in the houses, where would all the children go to school?

"I want to develop and improve what we already have in Chepstow, that is why I am totally opposed to this project."

"I am opposed to it for all the eloquent reasons put forward by the public. The area is an asset to the houses that sit behind it and what we could end up losing is the level of community. I believe it's over development and I'm absolutely opposed to it."

"Cllr Havard said: "I would like to oppose this; again there's been a submission for houses that are not needed. Traffic will add to the chaos already experienced on the A466. It's not needed and although it may seem a smaller development, the site could be put to better use for the community."

Cllr Farley added: "This development, if approved, would supply homes for people who don't work in Chepstow but commute to Newport, Cardiff or Bristol. We are not supplying our own economic space, I will oppose."

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2. *Development Impact: Proposed residential developments will add significant vehicle traffic, potentially worsening air quality without adequate data or mitigation plans.*

Monitoring methodologies fail to address cumulative or individual effects of these developments.

3. *Policy and Methodology Shortcomings: The RLDP's approach to air quality is seen as superficial, relying on minimal data and failing to apply the Precautionary Principle to ensure robust environmental protection.*

Local Air Quality Management (LAQM) guidance is used minimally, leading to limited and non-comprehensive assessments.

4. *Health and Human Rights: long-term, low-dose exposure to air pollutants, including PM2.5, is*

inadequately addressed, raising potential human health risks.

The RLDP does not explicitly incorporate human rights considerations related to health and environmental protection.

5. Precautionary Measures and Recommendations: A broader data-set, including portable emissions monitoring systems (PEMS), is recommended to improve air quality monitoring.

A call to integrate the Precautionary Principle into decision-making and planning processes to prevent potential harm.

6. Call for Policy Revisions: The submission advocates revising the RLDP to include better air quality monitoring, comprehensive data collection, and a balanced approach that prioritizes both development needs and environmental health.

The current infrastructure is insufficient to sustain further development as laid out in the current plans. Any additional traffic will undoubtedly cause a rise in pollution.

<https://law.gov.wales/environment-air-quality-and-soundscapes-wales-act-2024>

Q17

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 1: HEALTH AND ENVIRONMENTAL IMPACTS OF INCREASED AIR POLLUTION

The primary concern raised by local residents about the Mounton Road development is the anticipated increase in air pollution, particularly nitrogen dioxide (NO₂) levels, which could worsen the already poor air quality in Chepstow. The area around Highbeech roundabout, including the A48 and B4293 roads, has been identified as an Air Quality Management Area (AQMA) due to elevated concentrations of nitrogen oxides, including NO₂, a pollutant linked to respiratory issues and overall negative health impacts. Existing reports from 2007 and the most recent 2023 Air Quality Progress Report highlight that pollution levels in this area have not significantly improved over time, and local authorities have made minimal investment in addressing the issue.

There is considerable concern that the proposed development, which includes 150 newhomes, a hotel, and a care home, will exacerbate air pollution by increasing traffic congestion at the already overburdened Highbeech roundabout. The development is expected to generate additional car journeys, contributing to higher emissions. Despite the council's suggestion that people may walk or use bike lanes, residents argue that these measures will not significantly reduce the traffic or the associated pollution. The Welsh Government's Wellbeing of Future Generations Act (2015) sets out a goal to reduce air pollution and improve health outcomes, but this development is seen as conflicting with that objective.

Concerns are also raised about the lack of infrastructure plans to mitigate the increased traffic. The congestion caused by increased traffic will not only degrade air quality but will also hinder access for essential services, such as healthcare and social care workers, further straining the local community's health infrastructure. In addition, with the high concentration of pollutants in Chepstow, the development could negatively impact the health of local families, particularly children, and undermine the goal of creating a healthier, more sustainable living environment as outlined in various governmental acts, including the Public Health (Wales) Act 2017 and the Wellbeing of Future Generations Act.

Q27

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SECTION 2: IMPACT ON LOCAL INFRASTRUCTURE, ECONOMY, AND COMMUNITY WELL-BEING

The proposed development is also viewed as incompatible with the need for sustainable growth in Chepstow, which has limited infrastructure capacity to accommodate additional residents. Chepstow's schools are already oversubscribed. Adding more homes to the area without corresponding investment in educational facilities will only exacerbate this issue. Additionally, the development is likely to increase demand for local healthcare services, but there is no clear plan to address this potential strain on services, particularly in light of the area's existing air pollution and traffic congestion.

The economic impact of the development is also questioned. The development's proponents argue that it will contribute to local job creation, but residents are concerned that the new homes will mainly attract out-commuters, particularly to cities like Bristol, Cardiff, and Newport. This would not contribute to Chepstow's local economy and would instead increase the number of people dependent on cars for commuting. With the area already suffering from significant traffic congestion, including lengthy delays at the Highbeech roundabout, additional traffic would not only worsen local air quality but also further impede economic activity. Local councillors have previously expressed concerns about the sustainability of such development, questioning whether Chepstow's economy can support the influx of new residents and whether this growth will lead to an over-reliance on commuting, rather than fostering a more self-sustaining local economy.

Moreover, the design of the development, including the potential for taller buildings for the care home and hotel, raises concerns about the impact on the town's character and the surrounding landscape. The proposed development lies adjacent to the Wye Valley Area of Outstanding Natural Beauty (AONB), which is a significant asset to both the local community and tourism. There are fears that the new development will negatively alter the town's visual appeal, creating an "urban sprawl" and diminishing the area's natural beauty. This concern aligns with the objectives of the Historic Environment Wales Act (2023), which seeks to protect and manage Wales' historic and natural environments. The loss of green space and the introduction of higher-density development in a location already suffering from infrastructure and environmental challenges would, in the view of local residents, undermine the town's attractiveness as a place to live and work.

Q30. Fails Test – tick boxes

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 3: LEGAL AND POLICY CONFLICTS

The Mounton Road development proposal appears to conflict with several key legal and policy frameworks that guide sustainable development in Wales. The Planning (Wales) Act 2015, along with the Wellbeing of Future Generations (Wales) Act 2015, emphasizes the need for sustainable development that balances economic, social, and environmental considerations. Local residents argue that the Mounton Road development fails to meet these criteria, particularly in relation to environmental sustainability and health. The development will increase air pollution, traffic congestion, and put further strain on already stretched public services, all of which run counter to the goals of these acts.

Furthermore, the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local

Development Plan (RLDP) identifies objectives that the proposed development would fail to meet, particularly those related to green infrastructure, biodiversity, and the resilience of Monmouthshire's natural environment. The development's location on high-grade agricultural land, which is part of the 'Green Wedge' between Chepstow and Mathern, also raises concerns about the loss of valuable natural resources and the negative impact on the local landscape.

The Welsh Government's Environmental Air Quality and Soundscapes Act 2024 and the Public Health Act 2017 also appear to be in conflict with the proposed development, as it could worsen air quality and harm public health, particularly in a town already facing significant pollution challenges. The development's lack of a clear plan to address these concerns raises questions about whether it fully complies with the legal requirements set out in these acts.

Residents have pointed to previous objections to similar developments in the area, with local councillors expressing concern over the lack of infrastructure to support such growth. In 2013, a proposal for 200 new homes on Mounon Road was rejected for many of the same reasons, including the inability of the town's infrastructure to cope with the added pressure. With the current proposal still lacking concrete plans to mitigate these impacts, it is argued that the development should not be included in the final RLDP.

CONCLUSION AND CALL FOR ACTION

In conclusion, the proposed Mounon Road development is seen by many local residents as incompatible with the well-being and sustainability objectives set out by Welsh Government and local planning authorities. The development threatens to exacerbate air pollution, worsen traffic congestion, strain local services, and degrade the natural and historical character of Chepstow. It is in conflict with several key acts and policies, including the Wellbeing of Future Generations Act, the Public Health Act, and the Environmental Air Quality Act.

Given these concerns, residents are urging local authorities to reconsider the inclusion of this development in the final Replacement Local Development Plan, as it is perceived to offer more harm than benefit to the community's long-term health, sustainability, and well-being. Formal complaints are being considered if the development proceeds without adequate consideration of these critical issues.

No more houses in Chepstow or Bulwark until the infrastructure is ok for those who already live here.

Support Information 2

- Traffic generation versus the known capacity issues at High Beech roundabout. 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? This junction would likely have to be signalised, which would mean two signalled junctions very close to each other on St Lawrence Road.

' if Monmouthshire County Council and the Welsh Government add the Mounon Road Development Site to the RLDP they are doing so knowing that the nitrogen dioxide (NO₂) levels in the air at Highbeech roundabout and surrounding roads will increase; further breaking the EU Limit Value of 40µg/m³. They also know that this will have a negative impact on local residents' health and wellbeing.'

- Additional traffic generation at any location in Chepstow that interacts with High Beech can only worsen the already illegal pollution levels on Hardwick Hill. There is no evidence or plan to enable modal shift (i.e. more

people onto public transport or active travel).

- The housing growth figures are still predicated on creating huge numbers of new jobs in the county, but there is no evidence that this is possible, and then not to compete with the higher paid jobs available in neighbouring areas. There must therefore be a risk that new homes so close to the M48 (i.e. Chepstow in general) would attract out-commuters (e.g. to Bristol, Newport, Cardiff) and actually work against the plan's ambition to create thriving local communities which are less reliant on private car usage.
- Impact on landscape/historical amenity. The reports detail the proximity to the Coach Houses/St Lawrence House and the green wedge between Chepstow and Mathern/Pwllmeyric, but also that the effects are mitigatable with vegetation screening. Perhaps development on this site would spoil the natural character of the area and with the introduction of a hotel (no size is given) 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?
- Provision of social infrastructure such as healthcare and education. All needs significant investment and new development must contribute so this can be delivered alongside.

Thank you for your time.

.....

ONLINE QUESTIONS – not user friendly.

This is copied from the website.

Part 2: Your Representation

- Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?
- Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)
- Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)
- Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)
- Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)
- 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)
- Do you have any comments on the infrastructure policies? (Policies S6, & IN1)
- 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)
- Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)
- Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)
- Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)
- Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)
- Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)
- Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)
- Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)
- Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

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>
- 42. Do you consider that the Plan is sound?
No
- 43.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)?
- 44.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):

3657

Fiona Nicholson

Archived: 08 March 2025 09:49:15

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 22:38:43

Sent: Sun, 15 Dec 2024 22:38:25

To: [MCC - PlanningPolicy](#)

Subject: [REDACTED] OBJECTION TO MOUNTON PLANS

Importance: Normal

Sensitivity: None

[REDACTED]
planningpolicy@monmouthshire.gov.uk

[REDACTED]

[REDACTED] are emailing to object the MRLDP regarding the LAND at
MOUNTON ROAD, Chepstow

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Thank you for your time.

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ONLINE QUESTIONS – not user friendly.

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set out in the guidance notes at the end of the form):

3658

Eleanor Nicholson

Archived: 08 March 2025 10:00:51

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 22:38:43

Sent: Sun, 15 Dec 2024 22:38:25

To: [MCC - PlanningPolicy](#)

Subject: [REDACTED] OBJECTION TO MOUNTON PLANS

Importance: Normal

Sensitivity: None

[REDACTED]
planningpolicy@monmouthshire.gov.uk

[REDACTED] are emailing to object the MRLDP regarding the LAND at
MOUNTON ROAD, Chepstow

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We will do our best to make it concise and clear.

Our wellbeing is not considered only that of the for future generation.

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The traffic in the area has increased over the last twenty years that we have lived in this address. There are information below describing key issues that state our reasons for objects. (noise pollution, air pollution, light pollution, safety of pedestrians in the area cycling and walking. The list goes on but we hope that this summary will support our objection clearly)

May we please note that we are aware the majority of councillors who supported these outlines for plans, do not live in this area and will not directly suffer.

The Green space belongs to the community and residents of Wales.

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Housing developer Taylor Wimpey, has applied for outline planning permission to build up to 200 dwellings, highway access, open space and landscaping on land at Mounon Road.

Councillor Yvonne Havard said: "Chepstow hasn't got the facilities to cope with this amount of residential dwellings. If we support planning permission then we will be letting Chepstow and its residents down.'

"We need to think about the new families coming to live in the houses, where would all the children go to school?

"I want to develop and improve what we already have in Chepstow, that is why I am totally opposed to this project."

"I am opposed to it for all the eloquent reasons put forward by the public. The area is an asset to the houses that sit behind it and what we could end up losing is the level of community. I believe it's over development and I'm absolutely opposed to it."

"Cllr Havard said: "I would like to oppose this; again there's been a submission for houses that are not needed. Traffic will add to the chaos already experienced on the A466. It's not needed and although it may seem a smaller development, the site could be put to better use for the community."

Cllr Farley added: "This development, if approved, would supply homes for people who don't work in Chepstow but commute to Newport, Cardiff or Bristol. We are not supplying our own economic space, I will oppose."

Taken from:

<https://www.chepstowbeacon.co.uk/news/town-council-opposes-plans-for-new-houses-286420>

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There is an over-reliance on monitoring nitrogen dioxide (NO2) alone, neglecting other pollutants.

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Monitoring methodologies fail to address cumulative or individual effects of these developments.

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Local Air Quality Management (LAQM) guidance is used minimally, leading to limited and non-comprehensive assessments.

4. *Health and Human Rights: long-term, low-dose exposure to air pollutants, including PM2.5, is*

inadequately addressed, raising potential human health risks.

The RLDP does not explicitly incorporate human rights considerations related to health and environmental protection.

5. Precautionary Measures and Recommendations: A broader data-set, including portable emissions monitoring systems (PEMS), is recommended to improve air quality monitoring.

A call to integrate the Precautionary Principle into decision-making and planning processes to prevent potential harm.

6. Call for Policy Revisions: The submission advocates revising the RLDP to include better air quality monitoring, comprehensive data collection, and a balanced approach that prioritizes both development needs and environmental health.

The current infrastructure is insufficient to sustain further development as laid out in the current plans. Any additional traffic will undoubtedly cause a rise in pollution.

<https://law.gov.wales/environment-air-quality-and-soundscapes-wales-act-2024>

Q17

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 1: HEALTH AND ENVIRONMENTAL IMPACTS OF INCREASED AIR POLLUTION

The primary concern raised by local residents about the Mounton Road development is the anticipated increase in air pollution, particularly nitrogen dioxide (NO₂) levels, which could worsen the already poor air quality in Chepstow. The area around Highbeech roundabout, including the A48 and B4293 roads, has been identified as an Air Quality Management Area (AQMA) due to elevated concentrations of nitrogen oxides, including NO₂, a pollutant linked to respiratory issues and overall negative health impacts. Existing reports from 2007 and the most recent 2023 Air Quality Progress Report highlight that pollution levels in this area have not significantly improved over time, and local authorities have made minimal investment in addressing the issue.

There is considerable concern that the proposed development, which includes 150 newhomes, a hotel, and a care home, will exacerbate air pollution by increasing traffic congestion at the already overburdened Highbeech roundabout. The development is expected to generate additional car journeys, contributing to higher emissions. Despite the council's suggestion that people may walk or use bike lanes, residents argue that these measures will not significantly reduce the traffic or the associated pollution. The Welsh Government's Wellbeing of Future Generations Act (2015) sets out a goal to reduce air pollution and improve health outcomes, but this development is seen as conflicting with that objective.

Concerns are also raised about the lack of infrastructure plans to mitigate the increased traffic. The congestion caused by increased traffic will not only degrade air quality but will also hinder access for essential services, such as healthcare and social care workers, further straining the local community's health infrastructure. In addition, with the high concentration of pollutants in Chepstow, the development could negatively impact the health of local families, particularly children, and undermine the goal of creating a healthier, more sustainable living environment as outlined in various governmental acts, including the Public Health (Wales) Act 2017 and the Wellbeing of Future Generations Act.

Q27

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 2: IMPACT ON LOCAL INFRASTRUCTURE, ECONOMY, AND COMMUNITY WELL-BEING

The proposed development is also viewed as incompatible with the need for sustainable growth in Chepstow, which has limited infrastructure capacity to accommodate additional residents. Chepstow's schools are already oversubscribed. Adding more homes to the area without corresponding investment in educational facilities will only exacerbate this issue. Additionally, the development is likely to increase demand for local healthcare services, but there is no clear plan to address this potential strain on services, particularly in light of the area's existing air pollution and traffic congestion.

The economic impact of the development is also questioned. The development's proponents argue that it will contribute to local job creation, but residents are concerned that the new homes will mainly attract out-commuters, particularly to cities like Bristol, Cardiff, and Newport. This would not contribute to Chepstow's local economy and would instead increase the number of people dependent on cars for commuting. With the area already suffering from significant traffic congestion, including lengthy delays at the Highbeech roundabout, additional traffic would not only worsen local air quality but also further impede economic activity. Local councillors have previously expressed concerns about the sustainability of such development, questioning whether Chepstow's economy can support the influx of new residents and whether this growth will lead to an over-reliance on commuting, rather than fostering a more self-sustaining local economy.

Moreover, the design of the development, including the potential for taller buildings for the care home and hotel, raises concerns about the impact on the town's character and the surrounding landscape. The proposed development lies adjacent to the Wye Valley Area of Outstanding Natural Beauty (AONB), which is a significant asset to both the local community and tourism. There are fears that the new development will negatively alter the town's visual appeal, creating an "urban sprawl" and diminishing the area's natural beauty. This concern aligns with the objectives of the Historic Environment Wales Act (2023), which seeks to protect and manage Wales' historic and natural environments. The loss of green space and the introduction of higher-density development in a location already suffering from infrastructure and environmental challenges would, in the view of local residents, undermine the town's attractiveness as a place to live and work.

Q30. Fails Test – tick boxes

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 3: LEGAL AND POLICY CONFLICTS

The Mounton Road development proposal appears to conflict with several key legal and policy frameworks that guide sustainable development in Wales. The Planning (Wales) Act 2015, along with the Wellbeing of Future Generations (Wales) Act 2015, emphasizes the need for sustainable development that balances economic, social, and environmental considerations. Local residents argue that the Mounton Road development fails to meet these criteria, particularly in relation to environmental sustainability and health. The development will increase air pollution, traffic congestion, and put further strain on already stretched public services, all of which run counter to the goals of these acts.

Furthermore, the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local

Development Plan (RLDP) identifies objectives that the proposed development would fail to meet, particularly those related to green infrastructure, biodiversity, and the resilience of Monmouthshire's natural environment. The development's location on high-grade agricultural land, which is part of the 'Green Wedge' between Chepstow and Mathern, also raises concerns about the loss of valuable natural resources and the negative impact on the local landscape.

The Welsh Government's Environmental Air Quality and Soundscapes Act 2024 and the Public Health Act 2017 also appear to be in conflict with the proposed development, as it could worsen air quality and harm public health, particularly in a town already facing significant pollution challenges. The development's lack of a clear plan to address these concerns raises questions about whether it fully complies with the legal requirements set out in these acts.

Residents have pointed to previous objections to similar developments in the area, with local councillors expressing concern over the lack of infrastructure to support such growth. In 2013, a proposal for 200 new homes on Mounon Road was rejected for many of the same reasons, including the inability of the town's infrastructure to cope with the added pressure. With the current proposal still lacking concrete plans to mitigate these impacts, it is argued that the development should not be included in the final RLDP.

CONCLUSION AND CALL FOR ACTION

In conclusion, the proposed Mounon Road development is seen by many local residents as incompatible with the well-being and sustainability objectives set out by Welsh Government and local planning authorities. The development threatens to exacerbate air pollution, worsen traffic congestion, strain local services, and degrade the natural and historical character of Chepstow. It is in conflict with several key acts and policies, including the Wellbeing of Future Generations Act, the Public Health Act, and the Environmental Air Quality Act.

Given these concerns, residents are urging local authorities to reconsider the inclusion of this development in the final Replacement Local Development Plan, as it is perceived to offer more harm than benefit to the community's long-term health, sustainability, and well-being. Formal complaints are being considered if the development proceeds without adequate consideration of these critical issues.

No more houses in Chepstow or Bulwark until the infrastructure is ok for those who already live here.

Support Information 2 .

- Traffic generation versus the known capacity issues at High Beech roundabout. 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? This junction would likely have to be signalised, which would mean two signalled junctions very close to each other on St Lawrence Road.

' if Monmouthshire County Council and the Welsh Government add the Mounon Road Development Site to the RLDP they are doing so knowing that the nitrogen dioxide (NO₂) levels in the air at Highbeech roundabout and surrounding roads will increase; further breaking the EU Limit Value of 40µg/m³. They also know that this will have a negative impact on local residents' health and wellbeing.'

- Additional traffic generation at any location in Chepstow that interacts with High Beech can only worsen the already illegal pollution levels on Hardwick Hill. There is no evidence or plan to enable modal shift (i.e. more

people onto public transport or active travel).

- The housing growth figures are still predicated on creating huge numbers of new jobs in the county, but there is no evidence that this is possible, and then not to compete with the higher paid jobs available in neighbouring areas. There must therefore be a risk that new homes so close to the M48 (i.e. Chepstow in general) would attract out-commuters (e.g. to Bristol, Newport, Cardiff) and actually work against the plan's ambition to create thriving local communities which are less reliant on private car usage.
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3659

Mahairi Nicholson

Archived: 08 March 2025 15:19:07

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 22:38:43

Sent: Sun, 15 Dec 2024 22:38:25

To: [MCC - PlanningPolicy](#)

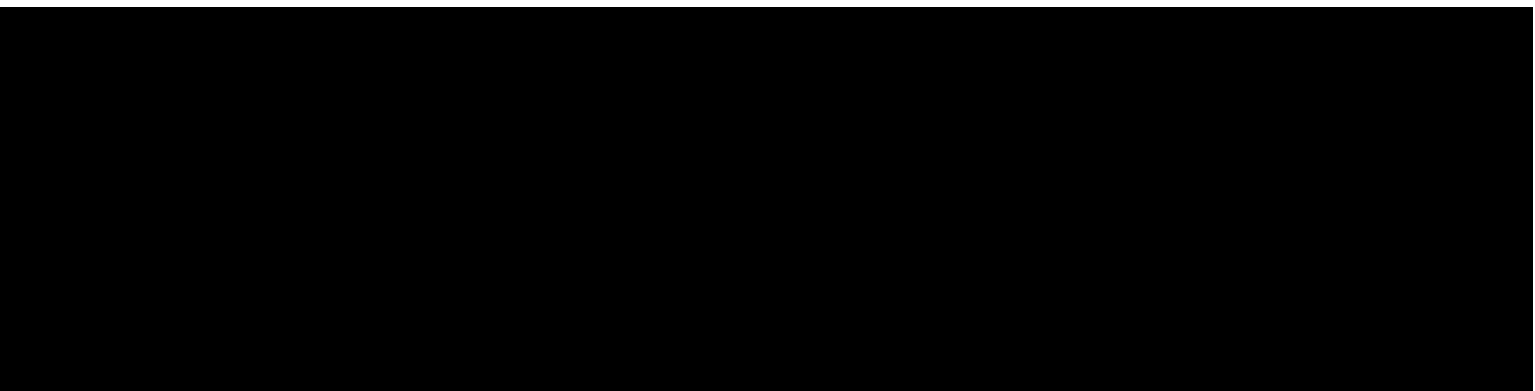
Subject: [REDACTED] OBJECTION TO MOUNTON PLANS

Importance: Normal

Sensitivity: None

For the attention of [REDACTED]

planningpolicy@monmouthshire.gov.uk



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Q27

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 2: IMPACT ON LOCAL INFRASTRUCTURE, ECONOMY, AND COMMUNITY WELL-BEING

The proposed development is also viewed as incompatible with the need for sustainable growth in Chepstow, which has limited infrastructure capacity to accommodate additional residents. Chepstow's schools are already oversubscribed. Adding more homes to the area without corresponding investment in educational facilities will only exacerbate this issue. Additionally, the development is likely to increase demand for local healthcare services, but there is no clear plan to address this potential strain on services, particularly in light of the area's existing air pollution and traffic congestion.

The economic impact of the development is also questioned. The development's proponents argue that it will contribute to local job creation, but residents are concerned that the new homes will mainly attract out-commuters, particularly to cities like Bristol, Cardiff, and Newport. This would not contribute to Chepstow's local economy and would instead increase the number of people dependent on cars for commuting. With the area already suffering from significant traffic congestion, including lengthy delays at the Highbeech roundabout, additional traffic would not only worsen local air quality but also further impede economic activity. Local councillors have previously expressed concerns about the sustainability of such development, questioning whether Chepstow's economy can support the influx of new residents and whether this growth will lead to an over-reliance on commuting, rather than fostering a more self-sustaining local economy.

Moreover, the design of the development, including the potential for taller buildings for the care home and hotel, raises concerns about the impact on the town's character and the surrounding landscape. The proposed development lies adjacent to the Wye Valley Area of Outstanding Natural Beauty (AONB), which is a significant asset to both the local community and tourism. There are fears that the new development will negatively alter the town's visual appeal, creating an "urban sprawl" and diminishing the area's natural beauty. This concern aligns with the objectives of the Historic Environment Wales Act (2023), which seeks to protect and manage Wales' historic and natural environments. The loss of green space and the introduction of higher-density development in a location already suffering from infrastructure and environmental challenges would, in the view of local residents, undermine the town's attractiveness as a place to live and work.

Q30. Fails Test – tick boxes

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 3: LEGAL AND POLICY CONFLICTS

The Mounton Road development proposal appears to conflict with several key legal and policy frameworks that guide sustainable development in Wales. The Planning (Wales) Act 2015, along with the Wellbeing of Future Generations (Wales) Act 2015, emphasizes the need for sustainable development that balances economic, social, and environmental considerations. Local residents argue that the Mounton Road development fails to meet these criteria, particularly in relation to environmental sustainability and health. The development will increase air pollution, traffic congestion, and put further strain on already stretched public services, all of which run counter to the goals of these acts.

Furthermore, the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local

Development Plan (RLDP) identifies objectives that the proposed development would fail to meet, particularly those related to green infrastructure, biodiversity, and the resilience of Monmouthshire's natural environment. The development's location on high-grade agricultural land, which is part of the 'Green Wedge' between Chepstow and Mathern, also raises concerns about the loss of valuable natural resources and the negative impact on the local landscape.

The Welsh Government's Environmental Air Quality and Soundscapes Act 2024 and the Public Health Act 2017 also appear to be in conflict with the proposed development, as it could worsen air quality and harm public health, particularly in a town already facing significant pollution challenges. The development's lack of a clear plan to address these concerns raises questions about whether it fully complies with the legal requirements set out in these acts.

Residents have pointed to previous objections to similar developments in the area, with local councillors expressing concern over the lack of infrastructure to support such growth. In 2013, a proposal for 200 new homes on Mounon Road was rejected for many of the same reasons, including the inability of the town's infrastructure to cope with the added pressure. With the current proposal still lacking concrete plans to mitigate these impacts, it is argued that the development should not be included in the final RLDP.

CONCLUSION AND CALL FOR ACTION

In conclusion, the proposed Mounon Road development is seen by many local residents as incompatible with the well-being and sustainability objectives set out by Welsh Government and local planning authorities. The development threatens to exacerbate air pollution, worsen traffic congestion, strain local services, and degrade the natural and historical character of Chepstow. It is in conflict with several key acts and policies, including the Wellbeing of Future Generations Act, the Public Health Act, and the Environmental Air Quality Act.

Given these concerns, residents are urging local authorities to reconsider the inclusion of this development in the final Replacement Local Development Plan, as it is perceived to offer more harm than benefit to the community's long-term health, sustainability, and well-being. Formal complaints are being considered if the development proceeds without adequate consideration of these critical issues.

No more houses in Chepstow or Bulwark until the infrastructure is ok for those who already live here.

Support Information 2

- Traffic generation versus the known capacity issues at High Beech roundabout. 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? This junction would likely have to be signalised, which would mean two signalled junctions very close to each other on St Lawrence Road.

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- Additional traffic generation at any location in Chepstow that interacts with High Beech can only worsen the already illegal pollution levels on Hardwick Hill. There is no evidence or plan to enable modal shift (i.e. more

people onto public transport or active travel).

- The housing growth figures are still predicated on creating huge numbers of new jobs in the county, but there is no evidence that this is possible, and then not to compete with the higher paid jobs available in neighbouring areas. There must therefore be a risk that new homes so close to the M48 (i.e. Chepstow in general) would attract out-commuters (e.g. to Bristol, Newport, Cardiff) and actually work against the plan's ambition to create thriving local communities which are less reliant on private car usage.
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- Provision of social infrastructure such as healthcare and education. All needs significant investment and new development must contribute so this can be delivered alongside.

Thank you for your time.

.....

ONLINE QUESTIONS – not user friendly.

This is copied from the website.

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- 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)
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- Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)
- Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)
- Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)
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Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
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- 44.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):

3660

Fraser Nicholson

Archived: 08 March 2025 10:07:26

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 22:38:43

Sent: Sun, 15 Dec 2024 22:38:25

To: [MCC - PlanningPolicy](#)

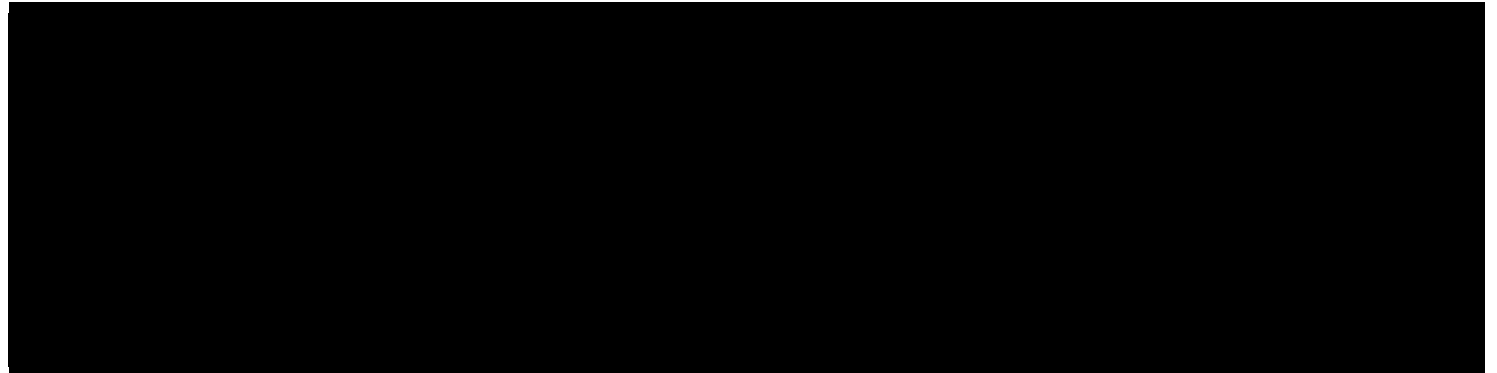
Subject: [REDACTED] OBJECTION TO MOUNTON PLANS

Importance: Normal

Sensitivity: None

For the attention of [REDACTED]

planningpolicy@monmouthshire.gov.uk



[REDACTED] are emailing to object the MRLDP regarding the LAND at
MOUNTON ROAD, Chepstow

Please make it known that to make an objection online to the below questions is not Deaf Friendly i.e. not in plain English and certainly not user friendly for the general public.

We have had to seek support in how to write this objection with no direct support from MCC. The engagement sessions are one way.

The decision to email is to hope that one member can express the objections on behalf of with the rest of the residents (due to struggling to fill in the questionnaire online)

We will do our best to make it concise and clear.

Our wellbeing is not considered only that of the for future generation.

The current infrastructure cannot cope with more people, health (GP are full and oversubscribed. The Grange Hospital cannot cope with current numbers of people, the A&E is unsafe with long waiting hours and treatments – this makes us fearful and in constant worry that the eldest resident's life is at risk should he need assistance from the NHS, and ambulance service. We have had personal experiences of the waiting times. More residents in the specific Moun-ton area and as well as other areas in Monmouthshire will impact our overall health and unnecessary illness and premature deaths. The health service is the Welsh Government's responsibility however councils are funded by the Welsh Government and have to adhere to all the acts in Wales particularly to current people who reside in the areas.

The traffic in the area has increased over the last twenty years that we have lived in this address. There are information below describing key issues that state our reasons for objects. (noise pollution, air pollution, light pollution, safety of pedestrians in the area cycling and walking. The list goes on but we hope that this summary will support our objection clearly)

May we please note that we are aware the majority of councillors who supported these outlines for plans, do not live in this area and will not directly suffer.

The Green space belongs to the community and residents 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.

(if the development goes ahead – this statement will have to be rewritten.)

<http://visitchepstow.wales/#:~:text=Chepstow%20is%20the%20gateway%20to,area%20of%20outstanding%20natural%20beauty>.

This statement from [REDACTED] back in 2013 still stands as nothing has changed.

'It was agreed by the council that Chepstow's infrastructure could not take many more residential dwellings.

Housing developer Taylor Wimpey, has applied for outline planning permission to build up to 200 dwellings, highway access, open space and landscaping on land at Mounton Road.

Councillor Yvonne Havard said: "Chepstow hasn't got the facilities to cope with this amount of residential dwellings. If we support planning permission then we will be letting Chepstow and its residents down.'

"We need to think about the new families coming to live in the houses, where would all the children go to school?

"I want to develop and improve what we already have in Chepstow, that is why I am totally opposed to this project."

"I am opposed to it for all the eloquent reasons put forward by the public. The area is an asset to the houses that sit behind it and what we could end up losing is the level of community. I believe it's over development and I'm absolutely opposed to it."

"Cllr Havard said: "I would like to oppose this; again there's been a submission for houses that are not needed. Traffic will add to the chaos already experienced on the A466. It's not needed and although it may seem a smaller development, the site could be put to better use for the community."

Cllr Farley added: "This development, if approved, would supply homes for people who don't work in Chepstow but commute to Newport, Cardiff or Bristol. We are not supplying our own economic space, I will oppose."

Taken from:

<https://www.chepstowbeacon.co.uk/news/town-council-opposes-plans-for-new-houses-286420>

Please listen to the people who live here, not the figures that forces the council to build unnecessarily.

Supporting information 1:

Concerns related to the Revised Local Development Plan (RLDP) in Monmouthshire and the way that Air Pollution levels are being monitored by MCC.

1. *Air Quality Concerns: the RLDP lacks comprehensive chemical compound data, particularly on PM2.5 and PM10 levels, which are crucial for assessing air quality impacts from traffic emissions.*

There is an over-reliance on monitoring nitrogen dioxide (NO2) alone, neglecting other pollutants.

2. *Development Impact: Proposed residential developments will add significant vehicle traffic, potentially worsening air quality without adequate data or mitigation plans.*

Monitoring methodologies fail to address cumulative or individual effects of these developments.

3. *Policy and Methodology Shortcomings: The RLDP's approach to air quality is seen as superficial, relying on minimal data and failing to apply the Precautionary Principle to ensure robust environmental protection.*

Local Air Quality Management (LAQM) guidance is used minimally, leading to limited and non-comprehensive assessments.

4. *Health and Human Rights: long-term, low-dose exposure to air pollutants, including PM2.5, is*

inadequately addressed, raising potential human health risks.

The RLDP does not explicitly incorporate human rights considerations related to health and environmental protection.

5. Precautionary Measures and Recommendations: A broader data-set, including portable emissions monitoring systems (PEMS), is recommended to improve air quality monitoring.

A call to integrate the Precautionary Principle into decision-making and planning processes to prevent potential harm.

6. Call for Policy Revisions: The submission advocates revising the RLDP to include better air quality monitoring, comprehensive data collection, and a balanced approach that prioritizes both development needs and environmental health.

The current infrastructure is insufficient to sustain further development as laid out in the current plans. Any additional traffic will undoubtedly cause a rise in pollution.

<https://law.gov.wales/environment-air-quality-and-soundscapes-wales-act-2024>

Q17

I oppose the inclusion of the Mounton Road development in the RLDP

SECTION 1: HEALTH AND ENVIRONMENTAL IMPACTS OF INCREASED AIR POLLUTION

The primary concern raised by local residents about the Mounton Road development is the anticipated increase in air pollution, particularly nitrogen dioxide (NO₂) levels, which could worsen the already poor air quality in Chepstow. The area around Highbeech roundabout, including the A48 and B4293 roads, has been identified as an Air Quality Management Area (AQMA) due to elevated concentrations of nitrogen oxides, including NO₂, a pollutant linked to respiratory issues and overall negative health impacts. Existing reports from 2007 and the most recent 2023 Air Quality Progress Report highlight that pollution levels in this area have not significantly improved over time, and local authorities have made minimal investment in addressing the issue.

There is considerable concern that the proposed development, which includes 150 newhomes, a hotel, and a care home, will exacerbate air pollution by increasing traffic congestion at the already overburdened Highbeech roundabout. The development is expected to generate additional car journeys, contributing to higher emissions. Despite the council's suggestion that people may walk or use bike lanes, residents argue that these measures will not significantly reduce the traffic or the associated pollution. The Welsh Government's Wellbeing of Future Generations Act (2015) sets out a goal to reduce air pollution and improve health outcomes, but this development is seen as conflicting with that objective.

Concerns are also raised about the lack of infrastructure plans to mitigate the increased traffic. The congestion caused by increased traffic will not only degrade air quality but will also hinder access for essential services, such as healthcare and social care workers, further straining the local community's health infrastructure. In addition, with the high concentration of pollutants in Chepstow, the development could negatively impact the health of local families, particularly children, and undermine the goal of creating a healthier, more sustainable living environment as outlined in various governmental acts, including the Public Health (Wales) Act 2017 and the Wellbeing of Future Generations Act.

Q27

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SECTION 2: IMPACT ON LOCAL INFRASTRUCTURE, ECONOMY, AND COMMUNITY WELL-BEING

The proposed development is also viewed as incompatible with the need for sustainable growth in Chepstow, which has limited infrastructure capacity to accommodate additional residents. Chepstow's schools are already oversubscribed. Adding more homes to the area without corresponding investment in educational facilities will only exacerbate this issue. Additionally, the development is likely to increase demand for local healthcare services, but there is no clear plan to address this potential strain on services, particularly in light of the area's existing air pollution and traffic congestion.

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Moreover, the design of the development, including the potential for taller buildings for the care home and hotel, raises concerns about the impact on the town's character and the surrounding landscape. The proposed development lies adjacent to the Wye Valley Area of Outstanding Natural Beauty (AONB), which is a significant asset to both the local community and tourism. There are fears that the new development will negatively alter the town's visual appeal, creating an "urban sprawl" and diminishing the area's natural beauty. This concern aligns with the objectives of the Historic Environment Wales Act (2023), which seeks to protect and manage Wales' historic and natural environments. The loss of green space and the introduction of higher-density development in a location already suffering from infrastructure and environmental challenges would, in the view of local residents, undermine the town's attractiveness as a place to live and work.

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set out in the guidance notes at the end of the form):

3661

Joanne Gantley

Archived: 10 March 2025 08:00:05

From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 13:54:19

Sent: Mon, 16 Dec 2024 13:53:46

To: [MCC - PlanningPolicy](#)

Subject: RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

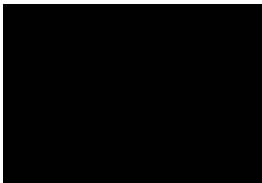
Attachments:

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 



I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file
<MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx>



This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

Welsh Government Planning Policy

Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.

Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.

Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

Public Transport

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

TAN 6 - Planning for Sustainable Rural Communities (July 2010)

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

Local Develop Plan Manual (March 2020)

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

MCC LDP Preferred Strategy (December 2022)

Page 26, paragraph 4.6, 3rd bullet point:

*• Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

Objectors comment

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

4.8 The scoring system is based upon the three principles.

4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
 - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
- *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

Table 1: Scoring System for Sustainable Transport and Accessibility

Active Travel	
Presence of Active Travel Routes within the Settlement	
Several Routes	10 points
One Route	5 points
No Routes	0 points
Walking distance to a higher order settlement via active travel route	
1.5 miles	1 point
Cycling distance to a higher order settlement via active travel route	
3.0 miles	1 point
Bus Services	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning

Figure 9: The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.

Objector's comments:

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynyddbach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

Green - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

Amber - Tiers 3 and 4 have a lower level of sustainability

Red - Tiers 5 and 6 are the least sustainable

Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

Settlement Cluster Analysis

Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
 - The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
 - The cluster should contain Settlements from Tiers 1 to 4.*
 - Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement's social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.

Objector's comments

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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Tier 1 – left out – not relevant

Tier 2 - left out – not relevant

Tier 3

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
St Arvans	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
Pwllmeyric	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
Mathern	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

Tier 4 – left out – not relevant

SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

Principle 3 – Employment opportunities

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

Transport Hierarchy and Conclusions

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

Other comments on the suitability of the housing allocation HA18 in Shirenewton

Heritage

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

3662

Elizabeth Moore

**Letter of Objection to Candidate Site CS0232 Land West of Redd Landes
Shirenewton**

I am a resident [REDACTED] and I am writing to object to the proposed development of 26 houses adjacent to Redd Landes, Shirenewton for the following reasons:-

1. Shirenewton is an historic village within a designated conservation area – the visual impact of a development of this size will significantly and detrimentally alter the rural character of the village and the surrounding landscape.
2. Since the proposed development will be on a greenfield site there is a potential loss of biodiversity and impact on wildlife habitats in our rural area.
3. The size of the proposed development will result in a significant increase in the volume of traffic through the village and along the Earlswood road where there is already a pinch point traffic-wise. The relatively narrow road together with increased traffic volumes could cause traffic congestion and also a risk to safety as the road provides access to the village recreation ground frequented by children.
4. I am also concerned that the Candidate Site outline map borders Ditch Hill Lane as it descends steeply to the B4235 – any roadway to the proposed housing development from this steep road would be dangerous.

[REDACTED]

Archived: 15 February 2025 15:54:57

From: [REDACTED]

Mail received time: Fri, 13 Dec 2024 17:05:42

Sent: Fri, 13 Dec 2024 17:05:33

To: [MCC - PlanningPolicy](#)

Subject: RLDP Deposit Plan Consultation CSO232 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Attachments:

[Letter of Objection to Candidate Site CS0232 Land West of Redd Landes Shirenewton.docx](#) 

To whom it may concern,

Please find attached a Letter of objection to the RLDP proposal CSO232

Yours faithfully,

[REDACTED]

3663

Emma Skyrme

Archived: 15 February 2025 12:47:00

From: [REDACTED]

Sent: Wed, 11 Dec 2024 11:01:22

To: [MCC - PlanningPolicy](#)

Subject: Resident Objection - Q10 RLDP Candidate Site CSO232 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Dear Planning team,

My name is [REDACTED]

I wish to strongly object to the Local Development proposal CS0232 construction of 26 houses adjacent to Redd Landes Shirenweton. Rational for object includes:

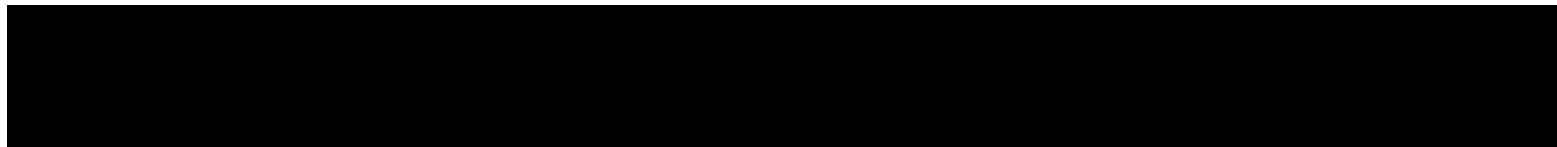
- Shirenewton is historical small village and is in designated conversation area – the majority of the houses are individual and stone built with a new 26 house site very much out of keeping with the rest of the village and will change the perception and character of the village.
- The proposed new estate size is too large comparatively for the size of the village and the existing infrastructure with narrow roads and current communal facilities – oversubscribed local school and limited bus services.
- The village spends considerably effort to maintain green spaces for the local people and maintain local wildlife populations with proposed significant building works resulting in loss green space and disrupting natural wildlife.
- The proposed site has poor drainage and often floods.
- There is much more suitable development plots closer to Chepstow that would have access to significantly better access to local amenities where such a sizeable project would have a much lower relative impact on the local community and more in keeping with several new developments already located there.

Thank you for your consideration and time to read my objection. We do hope if not rejected, that the development with be significantly reduced in scale with the aim to be in keeping with the rest of the village.

[REDACTED]

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[REDACTED]



3665

Gail Jones

Archived: 15 February 2025 12:49:46

From: [REDACTED]

Mail received time: Fri, 13 Dec 2024 23:37:15

Sent: Fri, 13 Dec 2024 23:36:56

To: [MCC - PlanningPolicy](#)

Subject: Objection - housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings

Importance: Normal

Sensitivity: None

Attachments:

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON 2.docx](#) 

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever. The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file, where it's explained in detail.

Yours faithfully

[REDACTED]

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Lande, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council's evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

Welsh Government Planning Policy

Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *'The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- *are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

Paragraph 4.1.12 of PPW states: *'It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

Paragraph 4.1.13 states: *The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

Paragraph 4.1.14 states: *The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

Public Transport

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

TAN 6 - Planning for Sustainable Rural Communities (July 2010)

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

Local Develop Plan Manual (March 2020)

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

MCC LDP Preferred Strategy (December 2022)

Page 26, paragraph 4.6, 3rd bullet point:

• *Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

Objectors comment

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

4.8 The scoring system is based upon the three principles.

4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
 - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
 - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

Table 1: Scoring System for Sustainable Transport and Accessibility

Active Travel	
Presence of Active Travel Routes within the Settlement	
Several Routes	10 points
One Route	5 points
No Routes	0 points
Walking distance to a higher order settlement via active travel route	
1.5 miles	1 point
Cycling distance to a higher order settlement via active travel route	
3.0 miles	1 point
Bus Services	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.

Objector's comments:

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

Green - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

Amber - Tiers 3 and 4 have a lower level of sustainability

Red - Tiers 5 and 6 are the least sustainable

Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

Settlement Cluster Analysis

Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
 - The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
 - The cluster should contain Settlements from Tiers 1 to 4.*
 - Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement's social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.

Objector's comments

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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Tier 1 – left out – not relevant

Tier 2 - left out – not relevant

Tier 3

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
St Arvans	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
Pwllmeyric	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
Mathern	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

Tier 4 – left out – not relevant

SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that *'Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

Principle 3 – Employment opportunities

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

Transport Hierarchy and Conclusions

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

Other comments on the suitability of the housing allocation HA18 in Shirenewton

Heritage

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

3666

George Martin

Archived: 15 February 2025 12:28:53

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 22:37:05

Sent: Sun, 15 Dec 2024 22:37:00

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: Objection to the RDLF (270 Houses on Fields off Dixon Road, Monmouth)

Importance: Normal

Sensitivity: None



Dear Sir/Madam,

As a resident in the [REDACTED] I wish to object to the RDLF for 270 Houses on Fields off Dixon Road in Monmouth, and I would like to suggest Wonastow Road (CS0274) as the preferred area for this development. My objections are as follows:

My chief concern is for the bat population. This proposed development equates to 20 football fields, and would affect the bats, but this would not be the case if the development is at Wonastow, as this is outside the bats' area.

The Dixon site is just too close to an AONB, and historical sites, and would also mean the loss of prime agricultural land. There are also flooding issues illustrated in drainage problems, with the closure of the Old Dixon Road and Osbaston due to serious flooding problems. Also, Monmouth Leisure Centre and the Driving Test Centre have had to shut down because of flooding. This has also led to emergency services including the Fire Service and Natural Resources Wales having to pump water away from the area.

And there would be higher levels of river pollution. The River Wye is Monmouth's water source and has already had two warnings from the Drinking Water Inspectorate, and surface run-off would further pollute Monmouth's drinking water.

There would be increased traffic congestion. There would be about 405 extra vehicles, increasing travel time by about ten minutes in peak hours, and adding about 476 tonnes of CO2 emissions each year. Also, the area's NO2 levels already exceed WHO guidelines, and extra PM2.5 which are currently not monitored. New residents would most likely be restricted to car travel as opportunities for cycling and pedestrians are limited.

There are poor job opportunities in Dixon and no playground provision.

An alternative site is at Wonastow Road, Monmouth which offers both Housing and Employment opportunities, and is within easy walking distance of some major employers such as Silbustons, Triwall, Singleton Court and Mandarin Stone. The soil is suitable for SuDS (free draining) and is downstream of where Monmouth takes its drinking water, is beyond the Bat Zone is not so environmentally sensitive.

Thank you for your time in reading my objections, and urge you to give them every consideration.



3667

Gareth Thomas

Archived: 15 February 2025 13:02:55

From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 01:41:33

Sent: Mon, 16 Dec 2024 01:41:14

To: [MCC - PlanningPolicy](#) [REDACTED]

Subject: Objection to Proposed Secondary Site CS0037 in the RLDP Strategy

Importance: Normal

Sensitivity: None

Dear Planning Department,

I am writing to formally object to the proposed secondary site CS0037, included as part of your RLDP strategy. My concerns are outlined below in detail. I request that I am provided with a reference number for future correspondence.

1. Transparency and Engagement Concerns

I strongly object to the inadequate transparency and engagement with residents throughout this process. Local Councillors and MCC have failed to engage meaningfully with the community. The chaotic publication of plans on October 14th via the Goytre Local Community Council (LCC) Facebook page—presented as a means of “transparent” communication—was both rushed and insufficient. Many residents were caught off guard, and subsequent removal of meeting minutes from these pages, which prematurely revealed Stage 3B plans, further eroded trust.

2. Site Viability and Decision-Making

There has been a lack of clarity in how RLDP planners assessed site viability for Penperlleni, particularly in transitioning from stages 3A to 3B. On December 2nd, council representatives orally conveyed that two alternative candidate sites were removed due to concerns about the suitability of a nearby bridge for vehicular and pedestrian access. This raises questions about the evidence and methodology used, especially since this bridge currently supports businesses and residential traffic, [REDACTED]

Additionally, it is unclear why access via Chainbridge or Monkswood was not adequately considered for these sites. Two of the secondary proposals with greater viability than CS0037 were discounted without sufficient explanation, raising serious concerns about the weighting and transparency of the decision-making process.

3. Traffic and Safety Concerns

The proposed development at CS0037 would exacerbate traffic issues on the A4042 trunk road, particularly where it narrows into a blind bend near the School Lane junction. There are no sufficient traffic-calming measures in place to mitigate these risks.

Furthermore, previous experiments with traffic restrictions along School Lane, aimed at reducing congestion during school hours, pushed vehicles into surrounding residential streets, creating new hazards. [REDACTED] on whether these issues have been considered in the current RLDP strategy, nor have they proposed viable solutions to the increased traffic that CS0037 would generate.

4. Access and Land Ownership Issues

Access to CS0037 has shifted from the trunk road to a proposed route through Trem Yr Ysgol, which includes private land owned and maintained by Greenbelt PLC. This land is protected under legal title deeds, with no easements for development

access. Residents of The Acres, who pay annual maintenance fees for this land, were not informed of such proposals. Greenbelt PLC has expressed strong opposition to any plans to alter this land’s use, and legal challenges are likely if MCC pursues this access route.

5. Environmental and Flooding Concerns

The green space around Trem Yr Ysgol has undergone significant efforts to restore wildlife habitats, which are now thriving with species such as red kites, bats, and foxes. Proposals for CS0037 would destroy these efforts, directly contradicting the environmental requirements set during the approval of The Acres development.

Additionally, the site includes a watercourse prone to flooding, exacerbated by recent heavy rainfall. Welsh Water also confirmed that a large water culvert runs beneath the northern boundary of CS0037, making it unsuitable for development. Emergency repairs to the culvert in November 2024 failed to resolve ongoing flooding issues, raising further questions about site viability.

Flooding risks to the nearby railway line, a strategic transport route, are also a major concern. Runoff from The Acres has already contributed to flooding along this line, and further development would likely worsen the situation.

6. Inadequate Amenities and Services

Penperlleni lacks the infrastructure to support additional housing. Public transport services are infrequent and unreliable, and the village lacks essential amenities such as a pharmacy or adequately staffed GP services. Footpaths along the A4042 remain poorly maintained, further limiting pedestrian safety. Development at CS0037 would only exacerbate these issues.

7. Lack of Community Engagement

It is deeply concerning that residents of Clos Telyn and Trem Yr Ysgol, who would be most affected by the CS0037 proposals, have not been engaged by the local Monmouthshire Councillor or the planning team. The lack of communication demonstrates a significant oversight in the consultation process.

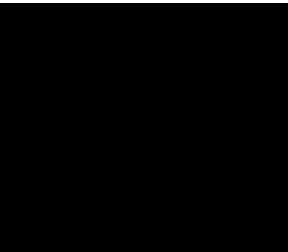
8. Failure to Address Welsh Government Rejections

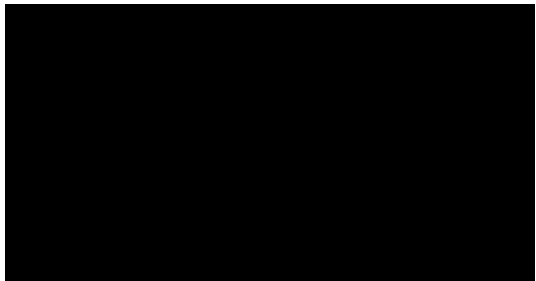
There are claims that previous applications to create access to CS0037 from the A4042 were rejected by the Welsh Government Highways Department. MCC’s apparent lack of awareness of these rejections is alarming. This suggests a failure to investigate critical information that could influence site viability and planning decisions.

9. Contradictions with MCC’s Environmental Assessments

The 2019 environmental impact report commissioned by MCC identified Penperlleni as unsuitable for further development due to significant environmental impacts. These assessments, which highlighted visual and wellbeing concerns for the community, appear to have been ignored in the RLDP process.

In summary, the proposed development at site CS0037 raises significant concerns around transparency, safety, environmental impact, and infrastructure capacity. The lack of adequate community engagement and the disregard for prior assessments undermine public confidence in this process. I request that my objections are formally noted.





3668

George Smith

Archived: 15 February 2025 13:14:12

From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 21:52:35

Sent: Mon, 16 Dec 2024 21:52:19

To: [MCC - PlanningPolicy](#)

Subject: Land at Mounon Road Chepstow, Monmouthshire DM/2024/01242

Importance: Normal

Sensitivity: None

I wish to submit an objection to this proposed development on the following reasons.

The area has been designated as green belt since 1981 and is also within an area of ONB. Chepstow does not have the infrastructure to accommodate such a development. From a highways point of view Chepstow is desperate for a bypass and the traffic congestion leading to the Severn bridge is at maximum capacity. Both the doctors surgery's and schools are also stretched. There are more suitable development opportunities in Monmouthshire than this proposed site. It would also have a detrimental effect on the historic market town of Chepstow. If this development was to go ahead it would be more akin to Milton Keynes. Chepstow no longer with the closure of major employers such as Fairfield Mabel and Dendix has an abundance of employment in the local area. The development of both the hotel and care home will bring at best minimum wage employment opportunities. [REDACTED] and feel if this development goes ahead will change Chepstow into one massive housing estate.

3670

Giles Phelps

Archived: 15 February 2025 15:26:01

From: [REDACTED]

Sent: Mon, 16 Dec 2024 22:59:10

To: [MCC - PlanningPolicy](#)

Subject: Objection to the Replacement Local Development Plan (RLDP) 2018 – 2033

Importance: Normal

Sensitivity: None

Attachments:

[Flood Water at Crick.jpg](#) [Flood Water at Crick 2.jpg](#)

Dear Sirs

I write to object to the proposed **Replacement Local Development Plan (RLDP) 2018 – 2033**. In particular, I believe details are not being taken into consideration for what you are referring to as Caldicot East but is the land between the village of Portskewett and the hamlet of Crick. Most notably land identified as CS0251 and CS0087.

1. On a point which we will continue to contest and prove that the council have misled people, CS0251 land is being referred to as Bradbury Farm Land. It is NOT owned by Bradbury Farm (or Bradbury's Farm) which was bought in 2013 and therefore is not in the Council's ownership. By deliberately continuing to refer to this land under this name, people in this community have been deliberately misled to its exact location. This was raised by people in the community, including Councillor Lisa Dymock that has spoken to this in many Council meetings including a recent one about the proposed Traveller's Site.
2. Under the Well-being of Future Generations Act 2015 I do not believe that the council has properly taken into consideration the environmental impact where there is already known to be flooding in the area and the impact 770 premises will have on the village of Crick. Monmouthshire County Council have a duty under the Act to demonstrate how it will 'prevent' problems occurring. Whilst developers have to stick to building regulations as a minimum, it will not take account of the impact of flood water issues and surface flooding that are already occurring in the village. Houses flooded in Feb/March 2020 and there is surface flood water on the Crick Road on an annual basis. In the County council meeting on 12th December 2024, Councillors admitted to the issue with flooding in the region that is beyond that of just maintenance problems. Please see proof of current water levels in Crick and also shows the highest level of river flooding over the proposed development.
3. The same Act also sets out that transport needs have to be considered. Monmouthshire's own 2024-2029 Local Transport Strategy acknowledges the lack of transport infrastructure problem in the area. There is no walkable railway station from locations CS0251 and CS0087. Buses to major locations of Chepstow and Newport are only once per hour (and this is not currently on the route so would also be after a greater than 15 minute walk into Caldicot), therefore doesn't meet current urban planning.
4. The Crick Road is already a busy road and is often used as a cut through by cars and lorries, including aggregate trucks under the height of 13ft9. The first 30 metres of the Crick Road in Crick, where it joins the A48, is not suitable for two vehicles above the size of a standard car to pass at this point. Therefore it is a single track road at this point. It cannot be widened due to the properties on either side. There is no mention of this at all in the 2024-2029 Local Transport Strategy and how traffic will be dealt with. Whilst councils may desire people to take public transport, as that is lacking too, road infrastructure again is shown to be too poor to cope with the demands that 770 premises would have on the area. There is also no pedestrian access so people cannot safely reach public transport on the A48.
5. Having looked a Data Map Wales, the land is agricultural land looks to be of Grade 3 or above – it was difficult to tell from the website but I have not seen this confirmed within MCC's documentation either. The land is currently successfully used by farmers for agricultural purposes. Under the National Planning Policy Framework, I do not believe this land qualifies as poor. It also has not been fully assessed for biodiversity in the Habitats Regulations Assessment and should have been covered before being selected sites.

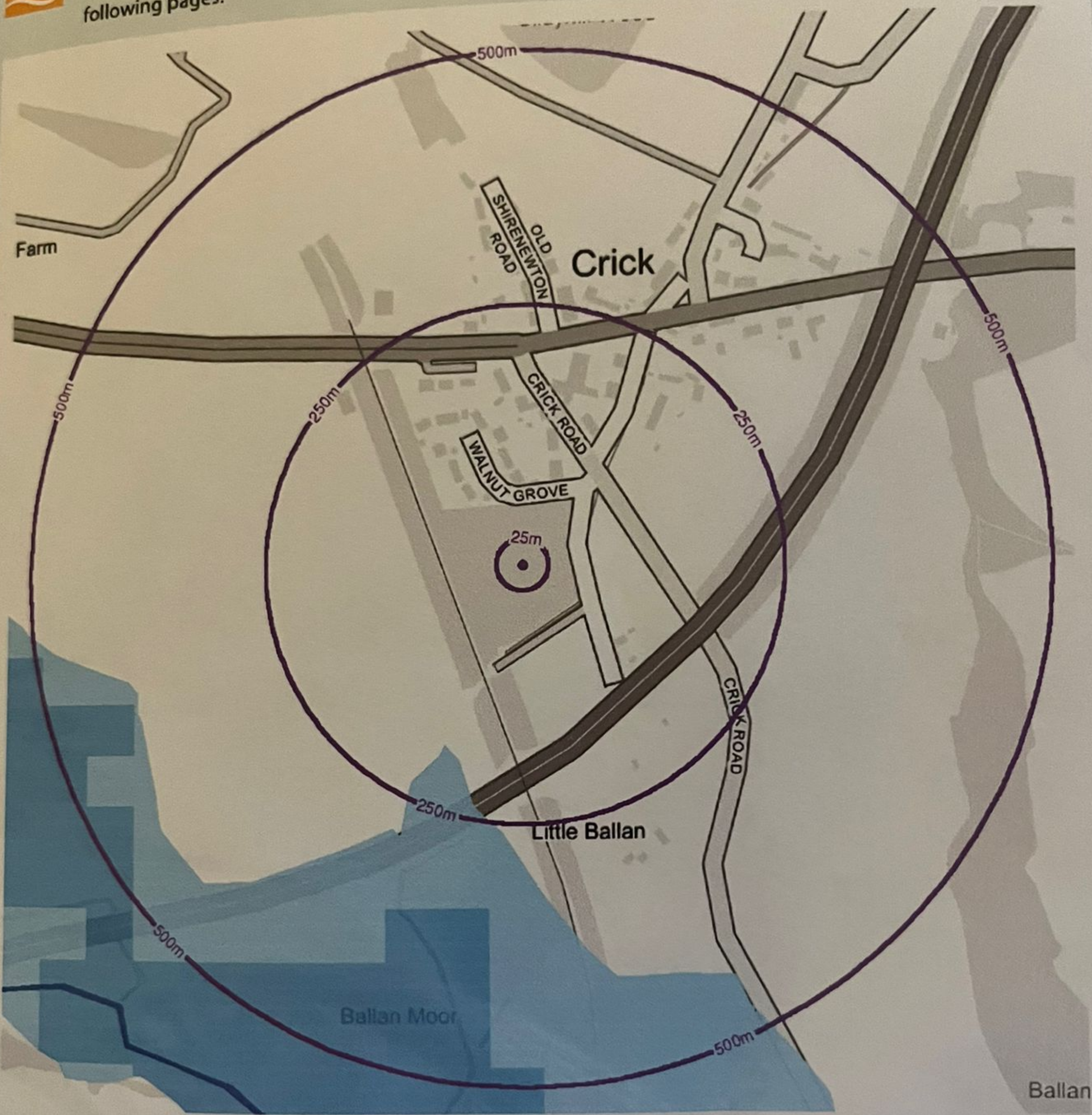
Yours faithfully





Section 2d and 2e: RoFRS and Historic Flood Events

The map below shows the location of RoFRS and Historic Flood Events. Further details are shown on the following pages.



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Risk of Flooding from Rivers and Sea (RoFRS)



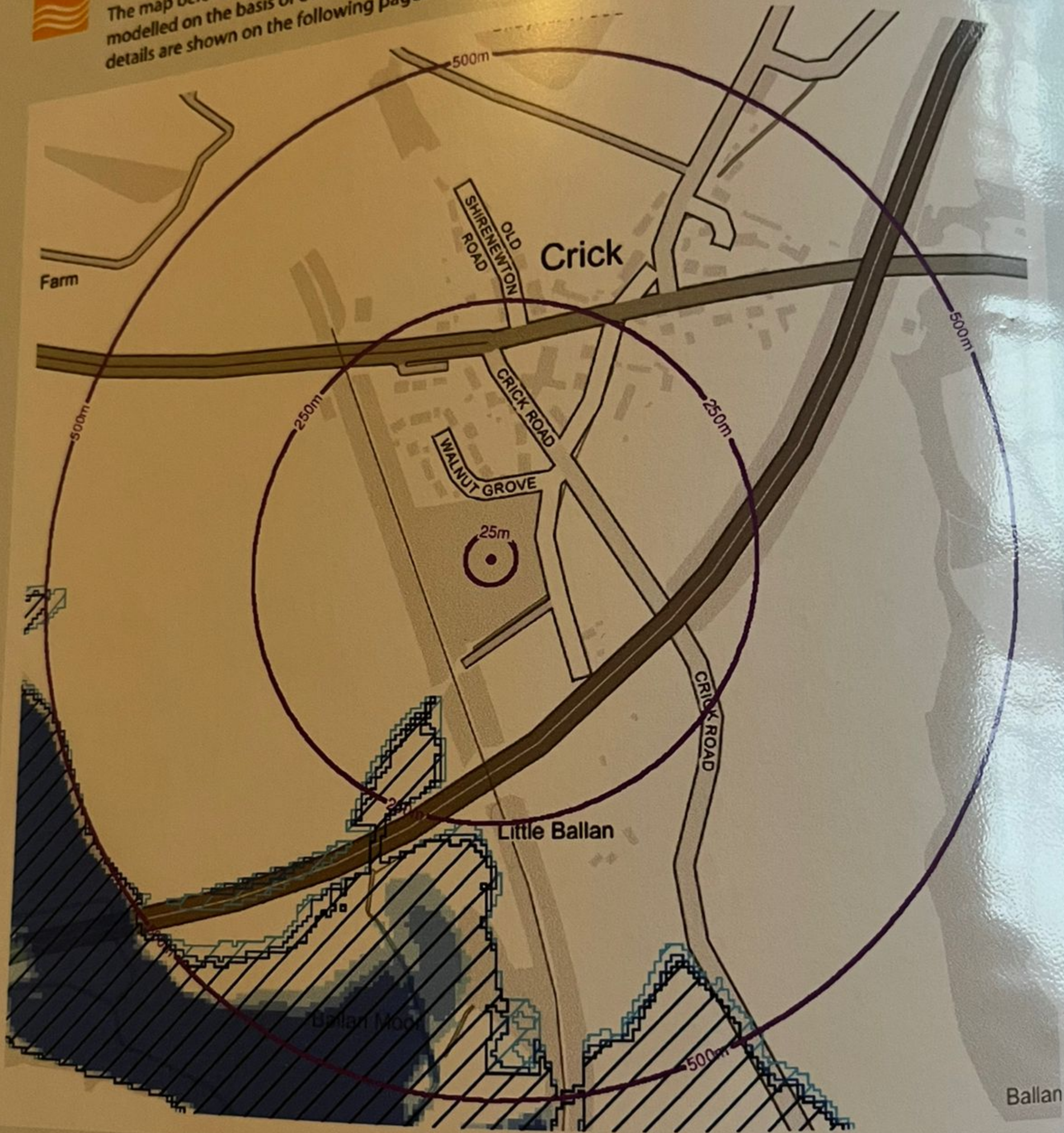
Historic Flood Events



Section 2a and 2b: River and Coastal Flooding

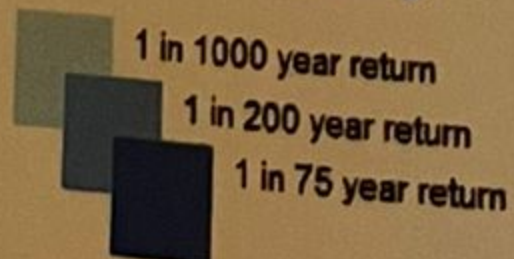


The map below shows the location of potential river and coastal flood risk. The potential risk has been modelled on the basis of events with a 1 in 75, 200 or 1000 chance of occurring in any given year. Further details are shown on the following pages.

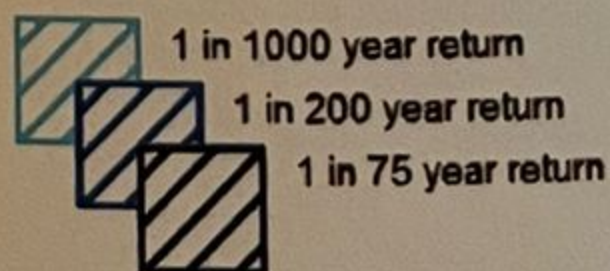


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River Flooding



Coastal Flooding



3671

Guy Evered-Hall

Archived: 15 February 2025 15:39:46
From: [REDACTED]
Sent: Mon, 16 Dec 2024 12:54:59
To: [MCC - Planning Policy](#)
Subject: RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton.
Importance: Normal
Sensitivity: None

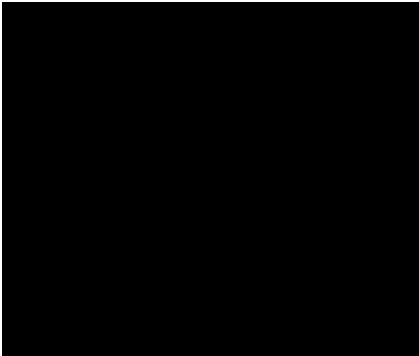
To whom it may concern,

I am writing to strongly object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development, adjacent to Redd Landes Shirenewton.

Shirenewton is set in a rural, conservation area and is renowned for being a small historic village. With small villages we face many challenges such as narrow lanes and at present the village has reached its capacity to cope with all the traffic it receives from its local residents. Adding a housing development of 26 houses will add a further 78 vehicles, taking into account one person per bedroom (proposed 3 bedroom houses.) The village infrastructure simply cannot sustain this added prosed development. The local school is already oversubscribed, bus services are severely limited and the narrow roads cannot cope with this additional proposal. Furthermore there is no local shop or medical facilities which would mean residents would require private transport to acquire these services, again the village infrastructure does not facilitate this added proposal of 26 new houses.

I strongly urge this proposal to be rejected.

Kind regards
Concerned resident



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_____ \line \lineThis email has been scanned by the Trend Micro Email Security system\lineon behalf of Arjo.\line \line_____

3672

Hazel Thorpe

View results

Respondent

595

Anonymous

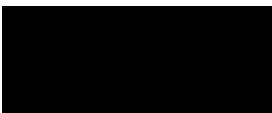
16:53

Time to complete

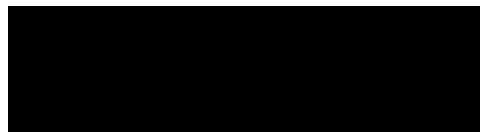
Part 1: Contact Details

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 *



2. Name *



3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

6. Telephone number *

7. Email *

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

CS2032 Redd Landes Shirenewton

I support the development , especially the affordable housing and believe it will bring fresh life to the village and support village businesses. However the following risks will need mitigation:

Speed limit dangerous any access road will join the Earlswood Rd in the 60 mph zone, the 20 zone will need extending. Access to the playground at the rec, combined with increased traffic from the development potentially puts children crossing at greater risk and a proper, safer crossing should be provided.

Fire appliances can't access because roads designed too narrow - roads on New estates often built too narrow.

Insufficient fresh water supply - the water supply is prone to being unavailable (out for 2 days recently) and upgrade is required.

Flooding - the ground is boggy due to rain runoff and will require proper water attenuation measures

Sewerage - given the water runoff, a combined sewer is probably unsuitable. This is a small village and the present sewers may be of Insufficient capacity.

I also recommend that the village name sign is moved to recognise the new village boundary.

Character - due consideration should be given style of houses to ensure they don't clash with the Character of the village.

Public transport - is rubbish, occupants will require car(s). Parking spaces will need to be provided at a rate of at least 1 per family, preferably 2.

School over subscribed - School place availability across the surrounding area should be considered as a whole to ensure there are sufficient spaces for all local children.

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 place-making 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 policies? (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 policies? (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

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?

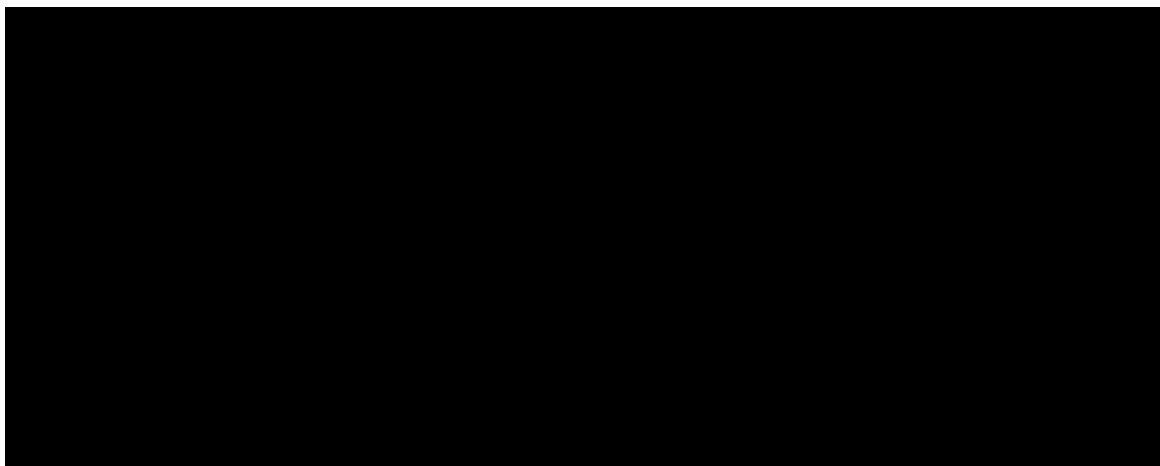
☐ Yes

☒ 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?



Archived: 15 February 2025 15:41:57

From: 

Mail received time: Mon, 16 Dec 2024 16:58:12

Sent: Mon, 16 Dec 2024 16:57:55

To: [MCC - PlanningPolicy](#)

Cc: [Love Of My Life](#)

Subject: RDLP deposit plan CSO2032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Sirs,

Re CS2032 Redd Landes Shirenewton

I support the development, especially the affordable housing and believe it will bring fresh life to the village and support village businesses. However the following risks will need mitigation:

Speed limit dangerous any access road will join the Earlswood Rd in the 60 mph zone, the 20 zone will need extending. Access to the playground at the rec, combined with increased traffic from the development potentially puts children crossing at greater risk and a proper, safer crossing should be provided.

Fire appliances can't access because roads designed too narrow - roads on New estates often built too narrow.

Insufficient fresh water supply - the water supply is prone to being unavailable (out for 2 days recently) and upgrade is required.

Flooding - the ground is boggy due to rain runoff and will require proper water attenuation measures

Sewerage - given the water runoff, a combined sewer is probably unsuitable. This is a small village and the present sewers may be of insufficient capacity.

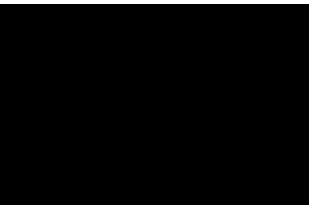
I also recommend that the village name sign is moved to recognise the new village boundary.

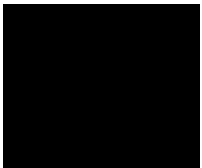
Character - due consideration should be given style of houses to ensure they don't clash with the Character of the village.

Public transport - is rubbish, occupants will require car(s). Parking spaces will need to be provided at a rate of at least 1 per family, preferably 2.

School over subscribed - School place availability across the surrounding area should be considered as a whole to ensure there are sufficient spaces for all local children.

Kind regards





3673

Holly Bisson

[REDACTED]

From: [REDACTED]
Sent: 16 December 2024 19:42
To: MCC - Planning
Subject: Land South of Monmouth road in Raglan

Hi there,

I am writing to object to the planning development plan for the land south of Monmouth road in Raglan. I think adding these homes will be unsustainable as it will be an added strain to the local population and services such as the local primary school won't be able to keep up. Secondly, the field offers valuable views of Raglan Castle, and building the homes would mean a disregard for Raglan's history. Lastly, the added population would cause further traffic problems in already congested areas like the high street. Thanks, [REDACTED]

3674

Huw Williams

Archived: 10 February 2025 13:00:05

From: [REDACTED]

Mail received time: Fri, 13 Dec 2024 20:22:44

Sent: Fri, 13 Dec 2024 20:22:27

To: [MCC - PlanningPolicy](#)

Subject: Response to the inclusion of Site HA4 in the Monmouthshire County Council Deposit Plan (RLDP 2018-2033)

Importance: Normal

Sensitivity: None

Response to the inclusion of Site HA4 in the Monmouthshire County Council Deposit Plan (RLDP 2018-2033).

In support or objection? **Objection**

I am extremely concerned by the proposal to develop 270+ houses on the fields off Dixon Road, Monmouth. I am a local resident to the site, and not only do I have multiple concerns about the site being developed from a personal point of view, but also its negative impact on the community of Monmouth a whole. These include:

- **Liability concerning the proposed access point on Dixon Close:**

As the owner of the large ancient Oak which currently overhangs the location of the proposed pedestrian access point (from the development to Dixon Close), I am extremely worried about not only any damage that will be caused to the tree during excavations to create the proposed access point, but my liability concerning anyone using the pedestrian path. As an ancient Oak it naturally sheds its dead wood on a routine basis, currently falling into either my property, the neighbouring fields or the grass verges and hedgerow at the end of Dixon close, thus not impacting or endangering anyone. However, should a footpath (or cycle path) be put directly beneath this I am concerned that I would be liable should any falling limbs interfere with the public users. I have not been consulted on this, and too my knowledge a survey has not looked at this access point in detail and thus identified these potential issues.

- **Dixon Close Access Point:**

Other than an arrow on a map no details have been provided to date on how the access point would be integrated into the current street layout? Currently there is a turning circle at the end of Dixon Close where the proposed access would be, and no pavement. Would the footpath lead directly out onto the road? Or would the turning circle be removed, which will negatively impact the local residents and inevitably will result in drivers being forced to mount pavements or use residents' driveways in order to turnaround? Without blocking people's driveways (or removing the turning circle) it is not clear how any safe pedestrian access point could be put in place. Furthermore, there is a major issue with parking in the upper part of Dixon Close, and The Gardens during the daytime, whereby people using the town and local schools routinely park their cars all the way along the road. Due to the narrow width of Dixon close these cars typically mount and park on the pavement to protect their vehicles. It is often impossible to walk the length of Dixon Close during the day without having to walk on the road, due to the pavement being used and blocked with parked cars. Wheelchair users, and mothers with prams are routinely forced to use the busy road (see below) as the pavements are impassible. However, the proposed development (and Dixon Close access point) would significantly increase the pedestrian users of this route, which is an accident waiting to happen.

- **Dixon Close, The Gardens and Dixon Road Traffic:**

There is already a major issue during commuting times with users using Dixon close and onto The Gardens as a cut through from the main Dixon Road and onto Hereford Road. These are commonly young drivers who are

trying to access the local high schools and are often travelling at speed while using the cut through. Due to the issues with parking outlined above Dixon Close and The Gardens are reduced to a single central lane at several points, particularly on the tight corners of The Gardens. Myself and several other local residents have reported multiple near misses during commuting times where we have been forced to take evasive action to avoid collisions at these pinch points caused by speeding drivers using the cut through during peak times. The proposal to develop the large number of houses at the Dixon Road site would significantly increase the number of road users in these neighbouring roads and again is a major accident waiting to happen. To date, a clear explanation of how these potential traffic issues will be addressed has not been provided, which in truth is likely to be the fact that the small Monmouth roads simply won't be able to cope with yet further traffic congestion.

- **Detrimental impact on the Environment and the AONB:**

The fields at Dixon Road upon which the development is proposed are a hive of wildlife activity. The fields are home to a plethora of countryside wildlife and are routinely visited by Red Kite and families of young Deer. We are also fortunate enough to witness the flying of the endangered Greater Horseshoe Bats over the fields on an almost nightly occurrence while they forage for their sustenance. It pains me that this ecosystem will be simply wiped out by the size of the development being proposed. Furthermore, it will change the appearance of Monmouth (and the AONB) for evermore, as the currently welcoming vibrant countryside which is the first landscape that welcomes visitors to Monmouth entering from the Dixon roundabout will be replaced by a housing development. I was of the understanding that this is conflicting with policy which is in place to protect the landscape and aesthetics of the Wye Valley AONB?

- **Drinking water contamination:**

We are unfortunate that the River Wye, the source of the drinking water in Monmouth is routinely polluted which has resulted in two recent warnings from the drinking water inspectorate. Our drinking water is frequently cloudy in colour, and has a high chemical smell, which had resulted in us not letting our young family drink the water on several occasions. The runoff and associated pollution from the proposed development would be entering the Wye some 400m upstream of where Monmouth's drinking water is taken. The SuDs drainage systems which are proposed to be implemented in the new development have routinely been proven to be ineffective (especially when not maintained correctly). The already present drinking water issues that Monmouth has are therefore only going to be further exacerbated by the development of the site, and the removal of the natural farmland pasture (and natural filter) which currently resides.

I have multiple other concerns for the location of the proposed development; lack of local employment, increased demand on local services, increased flood risk, increased levels of air pollution, lack of public transport increasing the number of cars and congestion in central Monmouth, and therefore seriously question why this site has been chosen?

I understand there are other optional sites for development which would not encounter the same issues as those at the Dixon Road site, and wouldn't have such a detrimental impact on Monmouth, especially in relation to environmental impact, and drinking water contamination.

The optional site on Wonastow Road is far closer to several of the larger employers in the area, and critically is already better served by the Active Travel route. Furthermore, it doesn't have the same concerns regarding flooding or Monmouth's water supply, and is also not within the AONB landscape setting. As the site is clearly more favourable than the site at Dixon Road I question why this site wasn't selected in the first place? Evidently a development on this site would have less of an impact on the community as a whole, and I therefore strongly urge you to reconsider the development of the site at Dixon Road, before this area of natural beauty and wildlife is irreversibly damaged.

I would be grateful if you could please confirm receipt of my email, and acknowledge that my comments will be submitted for the consultation phase.

Regards,



3675

Ian Jones

Archived: 10 February 2025 12:54:46

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 17:03:30

Sent: Sun, 15 Dec 2024 17:03:13

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: RLDP Consultation Response Site HA4

Importance: Normal

Sensitivity: None

Re: Planning Application - Proposed Development of 270 Houses on Dixon Road

This email expresses serious concerns regarding the proposed development of 270 houses on Dixon Road. I believe this development poses significant risks to the environment, public health, and the local community.

1. Water Quality Concerns: * **Runoff Pollution:** The clay soil in this area is prone to high levels of surface water runoff. The proposed development, with its increased impervious surfaces (roads, driveways, roofs), will exacerbate this problem. This will lead to increased pollution in local waterways due to the runoff carrying pollutants such as oil, fertilizers, and other harmful chemicals. * **SUDS Ineffectiveness:** Sustainable Drainage Systems (SUDS) are unlikely to be effective on clay soils. The high clay content can impede water infiltration, leading to SUDS becoming overwhelmed and failing to adequately manage stormwater runoff. * **Sewer Capacity:** The existing sewer infrastructure may be insufficient to handle the increased wastewater load from 270 additional homes. This could lead to sewage overflows, posing a serious risk to public health and the environment.

2. Air Quality and Traffic Congestion: * **Increased Traffic:** The development will inevitably lead to increased traffic on Dixon Road, exacerbating existing congestion and air quality issues. * **Air Pollution:** Increased traffic will result in higher levels of vehicle emissions, including harmful pollutants such as nitrogen dioxide and particulate matter, negatively impacting the health of local residents.

Real-life experience:: Last week the A40 was shut Eastbound due to a fallen tree past the Dixon roundabout. Result complete and utter vehicle gridlock all along Dixon road. It was wall to wall cars and lorries. This development will only make this worse.

3. Environmental Impacts: * **Loss of Farmland:** The development will result in the loss of valuable agricultural land, impacting local food production and the rural character of the area. * **Habitat Loss:** The proposed development poses a significant threat to local wildlife, including potentially impacting the habitat of rare bats. * **Flooding Risk:** 15% of the site being prone to flooding raises serious concerns about the safety and long-term viability of the development.

Real-life experience:: During the latest storm Darraugh, the Dixon Road was flooded right by the proposed access road as this is the lowest point of the entire road. This development will only make this worse.

4. Community Impact: * **Overburdened Infrastructure:** The road congestion at Dixon roundabout is really bad already. This proposal will make it worse.

5. There is no active travel routes in place from this site into town.

Real-life experience:: Although it's a 20mph road very few car drivers stick to this limit, as its a long straight road with no speed bumps or speed cameras. Why would you do 20mph when there is no deterrent! There is only a narrow pavement into town with overgrown hedges making it impossible to walk 2 abreast. Being passed by some bellend speeding is not a nice experience for me, my daughter who has to walk this road every day to school or [REDACTED] There's not even a pedestrian

crossing on Dixon Road and it has a school, doctors surgery and a nursery on it!

There is no cycle lane either. No families are going to cycle or walk into town. They will take their car leading to even more traffic congestion.

The other Monmouth site at Wonostow road (CS0274) is better suited to being developed as it has active travel routes already in place making it easy walking distance to town, and not liable to flood.

I urge the council to carefully consider these concerns and reject this planning application in favour of Wonostow road (CS0274).



3676

Jacqueline Broughton

Archived: 10 February 2025 12:47:28

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 21:45:11

Sent: Sun, 15 Dec 2024 21:44:53

To: [MCC - PlanningPolicy](#)

Subject: Fwd: FW: RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Attachments:

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

Please find attached the document that sets out my major concerns about the Replacement Local Development Plan Proposal CS0232 .

I am particularly concerned about the size and location of the proposed development. I believe that any new housing development should be sympathetic to the needs of the local community with regard to volume of traffic, road safety, adequacy of local services and general village community cohesion. Community cohesion is particularly relevant in rural communities like Shirenewton, which in the absence of many local services such as shops, doctor's surgeries , public transport , and local taxis , residents have to rely on local / neighbourly support.

I believe that the size and location of the proposed development is not adequately sympathetic to the needs of the local community in Shirenewton.

Kind regards

[REDACTED]

[REDACTED]

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

Welsh Government Planning Policy

Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.

Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.

Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

Public Transport

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

TAN 6 - Planning for Sustainable Rural Communities (July 2010)

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

Local Develop Plan Manual (March 2020)

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

MCC LDP Preferred Strategy (December 2022)

Page 26, paragraph 4.6, 3rd bullet point:

• *Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

Objectors comment

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

4.8 The scoring system is based upon the three principles.

4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
 - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
 - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

Table 1: Scoring System for Sustainable Transport and Accessibility

Active Travel	
Presence of Active Travel Routes within the Settlement	
Several Routes	10 points
One Route	5 points
No Routes	0 points
Walking distance to a higher order settlement via active travel route	
1.5 miles	1 point
Cycling distance to a higher order settlement via active travel route	
3.0 miles	1 point
Bus Services	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
---	----------

4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning

Figure 9: The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.

Objector's comments:

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

Green - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

Amber - Tiers 3 and 4 have a lower level of sustainability

Red - Tiers 5 and 6 are the least sustainable

Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

Settlement Cluster Analysis

Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
 - The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
 - The cluster should contain Settlements from Tiers 1 to 4.*
 - Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
 - Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement's social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.

Objector's comments

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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Tier 1 – left out – not relevant

Tier 2 - left out – not relevant

Tier 3

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
St Arvans	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
Pwllmeyric	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
Mathern	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

Tier 4 – left out – not relevant

SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that *'Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

Principle 3 – Employment opportunities

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

Transport Hierarchy and Conclusions

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

Other comments on the suitability of the housing allocation HA18 in Shirenewton

Heritage

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

3677

Jade Fyfe

From: [REDACTED]
Mail received time: Thu, 12 Dec 2024 10:25:50
Sent: Thu, 12 Dec 2024 10:25:29
To: [MCC - PlanningPolicy](#)
Subject: RLDP DEPOSIT PLAN CONSULTATION CSO2032 REDD LANDES SHIRENEWTON
Importance: Normal
Sensitivity: None
Archived: 10 February 2025 12:40:08

Hello,

I am writing to formally object to the proposed development of 26 houses, including 13 social/affordable homes, at site CSO2032 as outlined in the Monmouthshire RLDP Deposit Plan. While I understand the need for affordable housing, I have significant concerns regarding the impact this development will have on the village of Shirenewton and its residents.

1. Traffic Impact

The addition of 26 houses will potentially result in up to 75 extra vehicles traveling through Shirenewton daily. The village roads, which are narrow and already congested at peak times, are not equipped to handle this increase in traffic. This raises safety concerns for pedestrians, particularly children walking to the local primary school, and cyclists using these routes.

2. Infrastructure Strain

Shirenewton's existing infrastructure is not adequate to support this level of development. The local school is already nearing capacity, and additional families moving to the area may result in overstretched resources, impacting the quality of education. Similarly, medical services in the area are limited, with long waiting times already being reported.

3. Impact on Village Character

Shirenewton is a rural village with a strong community identity. A development of this scale risks altering its character significantly, creating a more unbiased environment inconsistent with the village's heritage and aesthetic.

4. Environmental Concerns

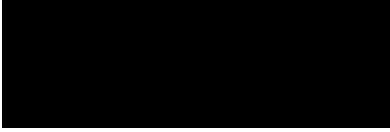
The proposed site is situated in a sensitive rural area. Development of this size will inevitably result in loss of green space, habitat destruction, and potential harm to local wildlife. Additionally, the increased traffic will contribute to noise and air pollution in what is currently a quiet and clean environment.

5. Lack of Comprehensive Consultation

Many local residents feel that there has not been sufficient consultation on this matter. Transparent engagement with the community is crucial to ensure that any development reflects the needs and concerns of those it will directly affect.

In conclusion, I strongly urge the council to reconsider the proposed development at site CSO2032. I believe that a more suitable location, with appropriate infrastructure and capacity to handle the demands of such a development, should be identified. I also request that a full and transparent impact assessment be carried out, addressing the concerns outlined above.

Thank you for considering my objection. I look forward to receiving confirmation that this matter will be given due consideration.



3678

James Guy

Archived: 10 February 2025 12:36:02

From: [REDACTED]

Sent: Sun, 15 Dec 2024 23:05:36

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: Concerns regarding the proposed housing development on Dixon Road/Site HA4

Importance: Normal

Sensitivity: None

Hello,

I am writing to you to share my significant concerns with regards to the proposed housing development on Dixon Road/site HA4. As a local resident, who wants the best for our town and to ensure that my children can grow up in an environment similar to that which I have enjoyed during the time that I have lived here, I have a number of concerns with regards to the welfare of the town and its people:

Water quality

The town is already under two notices from the Drinking Water Inspectorate, in addition to the proposed area failing phosphate targets and sewers already at capacity, together with the local treatment works regularly discharging sewage into the River Wye. This along with increased surface run off into the river and sustainable drainage systems (SuDS) not being effective on clay soil is of significant concern.

Traffic congestion & pollution

The proposed development of 270 homes would likely bring over 400 additional cars to the area, leading to (further) traffic issues for the town as well as increasing NO₂ levels even further in excess of WHO guidelines. This is also of serious concern with regards to the Dixon roundabout which is already a significant pinch point in the towns traffic system.

Environmental concerns

The proposed site would result in the loss of high-grade farmland, a proportion of which is prone to flooding and lies very close to the Wye Valley Area of Outstanding National Beauty, a protected landscape which conflicts with standard planning policy.

In addition, the site threatens the loss of habitat for endangered greater horseshoe bats, being within 3km of the core sustenance zone.

Consideration of alternative sites

I am aware of the alternative site on Wonastow Road (CS0274) which given a number of the concerns raised above, would be less significant if this site were to be selected instead, which also has a number of other benefits:

- There are approximately 2 hectares of nearby employment land
- The National Cycle Route 423 already passes the site, with further active travel routes planned (the nearest cycle lane to HA4 is approximately 2km away)
- The site is downstream of our drinking water supply (HA4 being upstream)
- Is not in an area with phosphate targets (HA4 is such an area)
- Site is primarily lower grade 3a agricultural land (HA4 is virtually all grade 2)

- The site is not a core sustenance zone for rare bats (HA4 is in a core sustenance zone)
- Not within close proximity of Area of Outstanding National Beauty (HA4 is within 500 metres, therefore a huge negative change to the national landscape and the gateway to Wales)
- Is only approximately 5% within zone 2 & 3 flowing parameters (HA4 is three times that at approximately 15%)
- Moderate effect on traffic congestion/trunk roads (HA4 would have a high impact, due to being within 100 metres of Dixon roundabout, which is already a high pinch point in the towns traffic system)

On balance, it is very hard to see from the above considerations how CS0274 would not be a more suitable site for Monmouth and should therefore be formally considered as an alternative site as part of a thorough consultation process to assess the most appropriate site as part of the RLDP. An unbiased opinion would surely see from the facts that this should be considered as a more suitable alternative site.

I would also like to add, with a decision of such importance, I am bitterly disappointed to learn that despite requests to discuss these widely considered views at a public meeting or in person (which I understand was a commitment made by Cllr Griffiths during the Council meeting in October), we have not been given the opportunity to do so.

Regards,



3679

James Heming

From: [REDACTED]

Sent: Mon, 16 Dec 2024 20:47:03

To: [MCC - PlanningPolicy](#)

Subject: Opposition to the inclusion of the Mounton Road site in the Monmouthshire RLDP consultation 2024

Importance: Normal

Sensitivity: None

Archived: 10 February 2025 12:24:06

[REDACTED]

I object to the development at Mounton Road being added to the RLDP

Additional traffic from any development in the Chepstow area has an immediate effect on the amount of traffic using the High Beech roundabout, and this will worsen the already illegal levels of pollution on Hardwick Hill which is one of the UK's most polluted locations regarding air quality. The council is well aware that levels in nitrogen dioxide will increase, thus breaking the limits set by the EU. This, in turn, will have a negative impact on local residents' health and well-being and will impact on already overstretched health services in the area.

People, including myself, have moved to the Chepstow area to get away from larger towns and cities in order to enjoy more green space and improved air quality. This development will have a negative impact on the very things which make Chepstow a great place to live and work and conflicts with the RLDP's and the Welsh Government Well Being Objectives.

The congestion caused by the increase in traffic will not only have a negative effect on air quality but will also hinder access for essential services such as healthcare and social care workers, thus putting further strain on the local community's already overstretched health infrastructure. An increase in pollution levels will also have a negative impact on the health of local residents, particularly children, which undermines the goal of creating a healthier and more sustainable living environment as outlined in various government acts, including the Public Health (Wales) Act 2017 and the Wellbeing of Future Generations Act.

The introduction of bike lanes and signs to switch off engines will not have any significant impact on the levels of air pollution and, despite knowing all the facts, the High beech roundabout is not going to be prioritised for improvement nor is a bypass, which would take much of the traffic off the A48.

The idea that people will walk from their homes into Chepstow or Bulwark is simply untrue, it doesn't happen now and will not happen in the future. Most of the new houses will be bought by people commuting to Bristol, Newport or Cardiff and who, will have, on average, 2 cars per household. This means that, along with proposed developments in Sedbury, Crick/Portskewett and, in the future Beachley, there will be at least 4000 more cars using the local roads, plus those accessing and servicing the care home and hotel. This development will also mean that Chepstow will continue to become a dormitory town for people working elsewhere and will do nothing to support job creation, transport and local service improvements in the immediate vicinity.

The development will increase waiting times at the High Beech roundabout which are already 30-40 minutes and can be longer if there is an incident of any kind on Hardwick Hill. Recently an issue with a water main brought the whole of Chepstow and the surrounding area to a standstill with queues backing up in both directions on the A48 and the Wye Valley Link Road. This in turn caused tailbacks on the M48 bridge and the motorway network and meant that people were trapped in the Tesco car park for nearly 4 hours. On an almost daily basis it can take over 40 minutes to travel from Tutshill to Pwllmeyric.

The Brunel Quarter development behind Tesco is another example of how over developing an area with poor road infrastructure has exacerbated an already overloaded road network as there is only one road in and out.

This development will also be in direct conflict with the council's aim to protect, enhance and manage Monmouthshire's natural environment, biodiversity and ecosystems. The increase in traffic and air pollutants is not good for the climate or for nature and as this site presents a green entrance into Wales and the Wye Valley and is

part of the “Green Wedge” it would be detrimental for this to be replaced with urban sprawl.

In 2013 it was agreed by the council that Chepstow’s infrastructure could not take many more residential dwellings. Since then there have been houses built on the A48 towards Lydney and 426 in the Brunel Quarter which have only added to the traffic misery. If the infrastructure was deemed unsuitable in 2013 it is now even more unsuitable. The council’s development policy is also in conflict with the Welsh Government who have advised that the number of new homes must be limited to a much smaller number, with an absolute maximum of 4,275. Monmouthshire is pushing for 5,940 across the county which exceeds the limit by 40%. The government has already expressed concern that Monmouthshire council’s approach is undermining the national plan which is centred on prioritising growth in the areas of Cardiff, Newport and the Valleys.

In addition to the above comments it must also be noted that this site is fertile agricultural land and , in building on it, the carbon footprint of the area is increased whilst at the same time destroying it’s carbon storage capabilities. Emissions arising from development flout climate objectives set by both the Welsh and UK governments.

The close proximity of a listed building also deems the site unsuitable as it conflicts and/or contravenes the Historic Environment Wales Act 2023. This act contains all the legislation needed to protect and manage historic monuments and buildings, conservation areas and other elements of Welsh historic environment. The view of St. Lawrence House from the A466 and it’s original parkland setting would be destroyed. Section 66 of the Planning(Listed Buildings and Conservation Areas) Act 1990 insists on preserving listed buildings and their environments.

There are so many negative aspects to this proposal which would have a catastrophic impact on Chepstow and the surrounding area that it is essential to remove this site from the RLDP

Sent from my iPad

3680

James

Archived: 10 February 2025 12:20:47

From: [REDACTED]

Sent: Mon, 16 Dec 2024 23:40:48

To: [MCC - PlanningPolicy](#)

Subject: RLDP redd landes Shirenewton

Importance: Normal

Sensitivity: None

Policy HA18 - Land west of Redd Landes, Shirenewton.

I would like to express my concerns regarding the proposed land for housing development consisting of 26 properties adjacent to Redd Landes and opposite the village hall.

Overdevelopment.

The scale of this development, with 26 properties, is disproportionate to the size of Shirenewton. It would significantly alter the character and feel of our village.

Impact on Conservation Area.

The land in question lies opposite the recreational field, which forms the boundary of the Shirenewton Conservation Area. The proposed development could negatively impact the visual integrity and the rural charm of the entrance to the village.

Light Pollution and Disruption to Wildlife.

The additional properties would likely result in increased light pollution, detracting from the natural beauty of the area and disturbing local wildlife habitats.

Traffic Increase.

A development of this scale would lead to a significant increase in traffic moving in and out of the village. This could have adverse effects on road safety, congestion, and the overall quality of life for current residents.

Strain on Local Infrastructure.

The current local infrastructure, including the primary school and facilities for preschool children, is already operating at full capacity. This development could put additional strain on these services, making it difficult for existing and new residents to access vital community resources.

I appreciate that there will be development requirements in all residential areas; however, careful consideration must be given to all aspects of any proposal. In the case of this site, I strongly feel that the number of houses proposed and their location are disproportionate and inappropriate for the area. The development seems to conflict with the existing format of the neighborhood and could have negative implications for local infrastructure and the overall environment, local amenities.

Regards

[REDACTED]

3681

Mr Jamie Lewis

Archived: 09 March 2025 10:42:04
From: [MCC - Planning](#)
Sent: Mon, 16 Dec 2024 09:53:41
To: [MCC - Planning](#) [MCC - PlanningPolicy](#)
Subject: FW: Objection to RLDP secondary proposed site CS0037
Importance: Normal
Sensitivity: None

FYI

From: [REDACTED]
Sent: 16 December 2024 01:25
To: MCC - Planning <Planning@monmouthshire.gov.uk>
Cc: [REDACTED]
Subject: Objection to RLDP secondary proposed site CS0037

Dear Monmouthshire Planning Department,

I am writing to you to object to the proposed secondary site CS0037 that forms part of your RLDP strategy.

In particular, the reasons for my objections are set out in detail below.

- To begin, I would like to object to the proposed plans due to fundamental transparency concerns around process and inadequate engagement with residents by Local Counsellors or MCC. There has been clear errors in the processes leading to poorly produced, last minute flyers being posted around to houses impacted by the plans, shortly after the chaotic online publication of plans (14th Oct) through Goytre Local Community Council (LCC) Facebook pages as a means of 'transparent' communication by the LCC. This publication contained minutes and details of the latest stages in plans I.e., Stage 3B, and were received and read by residents with great surprise and disappointment. Shortly afterwards, it transpired that the LCC meeting minutes (posted on FaceBook pages) were removed as it announced RLDP plans before official information was to be conveyed by official MCC planning team communications concerning stages 3B.
- My objections also relate to the decision points that have been arrived at by the RLDP planning team when agreeing site viability for our local Penperlleni secondary sites, particularly moving through stages 3A to 3B. There has been a clear lack of information being conveyed to the public, including your methodology of assessments when discounting shortlisted sites. Only on 2nd December it was conveyed orally by council representatives that two other candidate sites were removed due to the bridge adjoining Newton Rd / Star Lane / Plough Road as not being a suitable highway access for vehicles and pedestrians, although it works perfectly well now for the numerous business premises in the vicinity (Park Farm), or residents who live there, including the Local Councillor, Ms Jan Butler. What methodology and evidence was used to discount or to conclude that the highway is insufficient for two initially preferred candidate sites? Are there records held by the council of incidents happening that makes such access a danger to pedestrians? If that was the conclusion of course. Also there is access to these potential sites from Chainbridge direction and from Plough Rd, from Monkswood.
- There were two other sites in the secondary proposals for Penperlleni with greater viability than for CS0037 (as identified through the Council's own assessment methods), and discounted without sufficient information for the public to be aware or have opportunity to ask questions.

- The decision to discount the two other candidate sites raises questions around how planners determined what weighted their decisions etc. and why one site viability is greater than the other. For example, why access across a short distance bridge over the railway line is more of a concern, over above a one way busy road passing the primary school. And if the proposals for CS0037 moves forward, it would allow a significant increase in traffic that bottlenecks on to a 40 mph stretch of the A4042 trunk road, that has a blind bend in the one direction (south to north).
- The decision by planners also seemingly discounts that there is access to the other proposed sites from either direction, whether through Star Lane or Plough Rd, which also has an area of industrial business and access to the local sports playing fields, and much more opportunity for road calming measures.
- My objections also concern the lack of speed calming measures on the A4042 and the dangerous access that currently exists join the A4042 from School Lane. Residents currently have to deal with a 40mph blind bend, which creates a danger to road users and pedestrians who are crossing or trying to join the trunk road - [REDACTED] on the 40mph road due to the lack of pedestrian provisions in this area.
- Questions and concerns exist in relation to traffic calming measures which were put in place along School Lane in the last couple of years. There were road restrictions and access restrictions put in place during school times to prevent vehicle access along School Lane to a) prevent parents from parking their vehicles in School Lane during drop off and pick up times, as double parked vehicles were identified as creating dangerous obstructions in the road, particularly for children and parents having to cross the road. Also, measures/ restrictions were put in place to reduce the volume of traffic past the school. However, it is unclear what the outcome of this experiment was or whether the MCC planning team have ensured they have included in the proposed secondary site criteria as a negative impact. In our view, the temporary restrictions did not successfully achieve its objectives, as the traffic from parents parking vehicles was pushed into the side street including Clos Telyn and Trem Yr Ysgol, and restricting access for residents was too obstructive and burdensome to enforce.
- Any proposed plans under the RLDP that will create more vehicles onto School Lane will inevitably create an increased risk to school children and parents, and will not progress towards improved road safety or increase traffic calming measures. I would like to understand if and how the MCC planning team will preen the outcomes and evaluation of these road restrictions on School Lane along with their plans to the Welsh Government concerning CS0037? What did we learn from this exercise if it's being discounted for the sake of increasing traffic past and risks to the school?
- My further objection relates to the lack of transparency around the existing Welsh Government planning applications to access CS0037 proposed site off the A4042 trunk road. The Local Councillor for Goytre/ Penperlleni has indicated to a few residents that there had been at least 2 previous applications to create access off the A4042 trunk road, that had been rejected by the Welsh Government Highways department. Although these applications will have been made directly with the Welsh Government Highways Department, and not received and considered by MCC, MCC claim to not be aware of these applications. However, full information and candour should be presented to the Welsh Govt and awareness through the consultation process should be now be followed up by MCC to check whether the Local Counsellor's information is correct and I expect that MCC take ownership of this action and make the necessary enquiries with the Welsh Government.
- My concerns go deeper here, as this knowledge will have influenced the recent language shift in the proposed RLDP plans to suggest that now the access can be 'an extension of Trem Yr Ysgol'. It was never evidenced in earlier stage plans that this was the approach and it would seem consequential that information re. Trunk road access applications were known to planners and LCC to then have to

consider alternative means of access to proposed site CS0037, even without due diligence being undertaken to establish what the current access/ private land and ownership deeds are in place.

- There is a misplaced assumption by MCC planning and LCC that access to proposed site CS0037 can be straight through the 'green open space', attached to the Acres development in which Trem Yr Ysgol exists. The land to south west of Trem yr Ysgol is actually private land, owned and maintained by Greenbelt PLC and paid for by residents of the Acres through annual maintenance fees. This arrangement is detailed as a legal Charge in homeowners deeds, with a legal responsibility on homeowners to pay the annual surcharge set by Greenbelt PLC, as ownership of the land was transferred from Barratt (David Wilson Homes) upon completion of the Acres development. There is no easements for access to an adjoining field for developments, nor was the RLDP Strategy highlighted during land searches by appointed solicitors during the conveyancing process when the houses on the Acres were originally sold.
- Recently concerned residents of the Acres have been in contact with Greenbelt PLC about the proposed access route that MCC has now included in the latest plans. This was somewhat a surprise to Greenbelt, even to the extent that they were aghast to hear of any proposed plan that would require access across their land.
- Greenbelt PLC further confirmed that any such plan to cut across their land which is within residents Deeds would be met with opposition as such plans would contradict their *modus operandi* which was intent upon providing uninterrupted open space for the benefit of the community (who of course pay the maintenance fees). Such attempts to alter ownership or Charges on residents title deeds to accommodate access to CS0037 would be met with resistance and legal challenge to MCC.
- I am also concerned that there has been insufficient assessment of traffic flows and suitability of the existing highways. Clos Telyn or Trem Yr Ysgol were never developed as through roads or line marked to allow flow of traffic each side of the roads. The width of the highway and degrees of the turns are inadequate to accommodate such and increased volume of traffic.
- The contradiction of planning application requirements for former Barratt application and new proposed CS0037 site is an obvious oversight by MCC. The conditions on the developers of the Acres to ensure restorative efforts were met to re-introduce the nature and wildlife into and around the development was essential. The purpose of the green open space and surrounding areas was to ensure important wildfornia and habitats were replaced. We are at a very early stage in the restoration and for the wildflower meadow to take hold for residents and wider community to enjoy.
- There has been significant efforts over the past 5 years to reintroduce important habitats around Trem Yr Ysgol and Clos Telyn. We have seen the reintroduction of species of birds, including red kites, bats, foxes, stoats and a number of polecat sightings. The proposed plans by MCC want to overlook their own planning requirements for the former development at the Acres, and cut through the green space with an access road and harm the progress towards reintegration of significant environmental matters. I would be interested to know why the former planning application requirements are now being overlooked to just find a site that adds very little value or sense in the larger scheme of things.
- My objections also relate to the potential significant impact CS0037 would bring, given the boundary between Trem yr Ysgol and proposed site includes a water course way that is frequently prone to flooding, including large parts of the lower part of the field that is being proposed for CS0037. Change in weather and climate has led to increased heavy rainfall over significant period (including more recently in November 2024) and resulted in flooding of the land and boundary of the green open space. This has been documented by many residents. We have also seen increased erosion of the water course way that runs behind the houses towards the south of Trem Yr Ysgol, to the extent that, residents are being billed by Greenbelt for the repairs of the embankments that along

properties gardens, given the heavy flood waters are increasingly damaging.

- My objections also relate to the fact that Welsh Water has a significantly large water culvert that runs underground through the north border of proposed site CS0037. Questions need to be asked of the MCC as to whether they have made the necessary enquiries with Welsh Water whether it is possible to build over the water culvert that borders the northern part of the proposed site. It is questionable whether a road or building development can be placed on top of a significant water culvert - our own speculative enquiries with Welsh Water has confirmed that this would not be permitted by them. It is also worth being aware that during November 2024, Welsh Water attended the proposed site CS0037 to undertake emergency repairs to the pipework, which unfortunately has already failed to resolve the issues, and has created more flooding in the field adjacent to Trem Yr Ysgol.
- In the last four years there has also been an increased level of flooding into the railway line that is south of Trem yr Ysgol. Water run off as a result of the Acres development is likely to have been a contributing factors and given the railway line is a strategic line for Wales, joining the north to the south, further displacement of water run off or moving where flood water can rest due to a new housing development as being proposed by CS0037, is again likely to cause significant issue with flooding of the railway line. This should be carefully considered and I would like to understand what enquiries MCC has made with the Railways Authority or how these likely risks are being reflected into their planning process for the proposed site. I can provide documentation including photographic evidence to these particular concerns if necessary.
- I would also like to object to proposed site CS0037 due to the environmental impact report of 2019 that MCC commissioned itself, being overlooked and seems to have carried very little weight in the decisions around proposed sites within their RLDP plans. In particular, PE01 to PE05 indicated that any further development around Penperlleni posed a significant or high environmental impact on the environment due to bordering the National Park, including high visual and wellbeing impacts on the community. Why didn't these assessments carry more weight with the council's decision?
- My objections also relate to the substandard facilities and amenities in the village. There are significantly substandard and unreliable public transport facilities, including an infrequent and ineffective bus network, and lack of access to rail transport due to position of nearest train stations. There are also insufficient provisions, such as access to pharmacy care, or GP services with a very limited service currently being offered with a high probability that it will cease to be offered in the near future. The footpaths around the village are also considerably under maintained with footpaths along the main road A4042 so dangerous for pedestrians.

I would also like to place on record that there are serious transparency concerns around the process for the proposed secondary sites at Penperlleni, including lack of disclosure of information from the number of preferred sites altering from stages 3A to 3B, where decisions in my view have been taken through misinformation concerning legal right of way and land ownership, leading to ill-judged criteria being used. I am also concerned that there has been no resident engagement concerning proposed site CS0037 by our local Monmouthshire Councillor, Ms Jan Butler. Not one resident of [REDACTED], have been spoken to about the latest progress of the plans considering the serious degree of impact it would have on residents here.

Please could you provide me with a reference number for my concern and note that this email I am responding to the consultation is preferred for future correspondence.

Best wishes

[REDACTED]

3682

Janet Evans

Archived: 10 February 2025 12:17:34

From:

Mail received time: Thu, 12 Dec 2024 14:47:45

Sent: Thu, 12 Dec 2024 14:47:40

To: [MCC - PlanningPolicy](#)

Subject: RLDP Deposit Plan Consultation CS02032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

I am writing to object to the plan as overdevelopment of the village. The land in question preserves the setting and special characteristic of the small historic village which is situated on a high ridge with far-reaching views, and moreover is within a designated conservation area. The village has no amenities apart from the pub and the narrow lanes are unsuitable for the inevitable increase in traffic which would necessarily result from the addition of an extra housing estate. [REDACTED]

[REDACTED]

3683

Dr Jane Butterworth



**Office
Use Only**
Representor
Number

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.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website:

www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to:

planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadry, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

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.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		
Job Title:(where relevant)		
Organisation: (where relevant)		
Address:		
Telephone No:		
Email:		





Part 2: Your Representation

**Office
Use Only**
Representor
Number
.....
.....
.....
.....

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection



Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?	Support:	
	Objection:	Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment



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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Support:



Is your representation in support or objection?	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. No additional comment		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. No additional comment		

8. Do you have any comments on the infrastructure policies? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		



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

No additional comment

**9. 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)**

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

1. The number of proposed new houses is excessive.

There is planning consent for 15 houses in Shirenewton / Mynyddbach already in place which have not yet been built. This is a 5.36% increase on the present number



of houses and is 13.88% of the new housing allocation for Tier 3 and Tier 4 rural settlements. To add a further 26 houses is disproportionate to the size of the community.

2. Sewerage

The Infrastructure Delivery Plan states “there are no issues with water supply network of foul flows being accommodated for the site at Newport Nash WWTW”

The statement may be true but there are long standing issues with the sewerage system between Shirenewton and Newport Nash which so far have not been resolved even though a considerable sum of money has been spent by Welsh Water to rectify the problems.

The present sewerage system may have the capacity to support the present number of houses in dry weather but is incapable of supporting them in wet weather and leads to effluent bursting out of the system in Mounton, polluting the fields, Mounton Brook and ultimately the Severn estuary. The existing pumping system in Mathern is also affected in wet weather and overloads, with effluent also polluting the fields there.

3. Roads and transport

We have no pavements on the main roads through the village, pedestrians are often at risk of harm from passing traffic, a substantial number of which ignore the 20mph speed limit, the proposal does not say how this problem will be resolved, other than by the installation of a pavement by the development.

We have only 5 buses in each direction each day on the route from Cwmbran to Chepstow, 4 on Saturday and none on Sundays or Bank Holidays. The bus service ends in the early evening, there are no buses to Severn Tunnel Junction or Newport, this requires changing in Chepstow. In other words, for any resident, it is essential to have a car.

The proposed development at “The Land at Mounton Road Chepstow” will add 146 houses next to the Beech Hill roundabout which is already highly congested and well known for poor air quality, this development will further extend the traffic congestion with the potential of causing gridlock in the area which will have a knock of effect for residents of Shirenewton and Mynyddbach.

4. Schools

The local primary school is well regarded and draws in pupils from surrounding villages, there is therefore no assurance that children from the new development would be able to use the school and would potentially have to travel some distance to the nearest available school.

Likewise, the nearest secondary school is in Chepstow and cycling is not an option for school aged children, particularly along the B4235, which is prone to severe accidents.

5. Electrical supply

With the move away from combustion engine vehicles to electric vehicles there is a requirement for each new house to have a 415v 3 phase charging point. The present substations serving the village do not have the capacity to provide this.

The village also lies in an area of poor mobile reception and it is also a poor reception area for smart meter mesh connections, resulting in failure to send data to the energy providers for accurate billing, or even being able to use the EV tariff rates.





6. Facilities

We have no doctor surgeries, dentists, pharmacies, shops, garages or cash machines within Shirenewton or Mynyddbach or within a 20 minute walking time. An attempt to gain a weekly post office mobile service in Shirenewton did not come to fruition as it was deemed by the post office as being unviable.

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment



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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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



Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. No additional comment		

16. Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. No additional comment		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	Objection



Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

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

Is your representation in support or objection?

Support:

Objection:

Objection

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

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

No additional comment

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?

Yes:

No:

No

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)? ☒
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 comments in question 10	

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.

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:	No
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	



Part 5: Welsh Language

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?

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?





Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024**) will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness

Preparation Requirements:

- Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?)
- Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)



Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?



New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: <https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/>
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: <http://www.monmouthshire.gov.uk/your-privacy/your-council>

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

3684

Jane Eickhoff

Archived: 11 March 2025 09:04:09

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 21:05:22

Sent: Sun, 15 Dec 2024 21:04:52

To: [MCC - PlanningPolicy](#)

Subject: Fwd: RLDP Deposit Plan Consultation CS02032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Attachments:

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

Dear Sirs

Following my previous letter of objection (see below), I would like to add the following points contained in the attached word doc.

Many thanks

[REDACTED]

----- Forwarded message -----

From: [REDACTED]

Date: Fri, 13 Dec 2024 at 16:13

Subject: RLDP Deposit Plan Consultation CS02032 Redd Landes Shirenewton

To: <planningpolicy@monmouthshire.gov.uk>

Dear Sirs

I am writing to object to the above mentioned Replacement Local Development Plan for Shirenewton.

Whilst I understand many of the reasons for building new houses, and that those houses will be more sustainably built than existing housing, I note that initial consultation around previous development proposals for land in Shirenewton have been rejected by Monmouthshire, and 4 out of 5 of those proposals concerned land ADJACENT to the proposal for land adjacent to Redd Landes, namely:

CS0208 West Shirenewton, Recreation Hall Shirenewton

CS0218 Land at Ditch Hill Lane, Shirenewton (Option A)

CS0225 Land at Ditch Hill Lane, Shirenewton (Option B)

CS0226 Land at Ditch Hill Lane, Shirenewton (Option C)

CS0111 Adjacent to Thistledown Barn, Shirenewton

The reasons for rejection that you outlined in your document referenced below are STILL valid for CS02032, as nothing has happened to improve any of the challenges identified. Please see these reasons for rejection here:

<https://democracy.monmouthshire.gov.uk/documents/s39939/Appendix%206%20Initial%20Consultation%20Report.pdf>

I have a particular objection with regard to schooling. The proposed 26 houses would undoubtedly attract families to the village. Our catchment area also extends to Devauden, where there is another proposal for a further 20 houses (CS0214).

As Chair of Governors at Shirenewton School, I question the ambition to accommodate additional children. The school accommodates 210 pupils, split roughly 50% within catchment and 50% out-of-catchment. Presently the school is close to capacity. If the plan goes ahead, the LA is likely to need to bear the cost of transporting new in-catchment children to other

schools in the cluster, whilst the out-of-catchment children continue through the school. Additionally, there is a precedent for siblings for out of catchment children to attend the school with older brothers and sisters.

There would also be a longer term concern over schooling capacity more widely in Chepstow, if other proposals underway in Chepstow, Caldicot and Caerwent go ahead without consideration to the number of school places available.



This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council's evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

Welsh Government Planning Policy

Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *'The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

Paragraph 4.1.12 of PPW states: 'It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.

Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.

Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

Public Transport

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

TAN 6 - Planning for Sustainable Rural Communities (July 2010)

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

Local Develop Plan Manual (March 2020)

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

MCC LDP Preferred Strategy (December 2022)

Page 26, paragraph 4.6, 3rd bullet point:

*· Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

Objectors comment

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

4.8 The scoring system is based upon the three principles.

4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
 - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
 - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

Table 1: Scoring System for Sustainable Transport and Accessibility

Active Travel	
Presence of Active Travel Routes within the Settlement	
Several Routes	10 points
One Route	5 points
No Routes	0 points
Walking distance to a higher order settlement via active travel route	
1.5 miles	1 point
Cycling distance to a higher order settlement via active travel route	
3.0 miles	1 point
Bus Services	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning

Figure 9: The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.

Objector's comments:

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynyddbach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

Green - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

Amber - Tiers 3 and 4 have a lower level of sustainability

Red - Tiers 5 and 6 are the least sustainable

Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

Settlement Cluster Analysis

Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
 - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
 - *The cluster should contain Settlements from Tiers 1 to 4.*
 - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
 - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
 - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
 - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement's social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.

Objector's comments

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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Tier 1 – left out – not relevant

Tier 2 - left out – not relevant

Tier 3

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
St Arvans	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3

Pwllmeyric	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
Mathern	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
Shirenewton/Mynydd bach	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

Tier 4 – left out – not relevant

SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network

Maps as an Active Travel cycle route nor as future route but is mentioned on the website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the

distance between the settlements is less than 3 miles. The reasons for the difference in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any shops, post office, banks, or even a single café. Therefore, for convenience stores and other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

Principle 3 – Employment opportunities

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *‘To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.’*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

Transport Hierarchy and Conclusions

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

Other comments on the suitability of the housing allocation HA18 in Shirenewton

Heritage

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

Archived: 11 March 2025 09:04:30

From: [REDACTED]

Mail received time: Fri, 13 Dec 2024 16:13:18

Sent: Fri, 13 Dec 2024 16:13:04

To: [MCC - PlanningPolicy](#)

Subject: RLDP Deposit Plan Consultation CS02032 Redd Landes Shirenewton

Importance: Normal

Sensitivity: None

Dear Sirs

I am writing to object to the above mentioned Replacement Local Development Plan for Shirenewton.

Whilst I understand many of the reasons for building new houses, and that those houses will be more sustainably built than existing housing, I note that initial consultation around previous development proposals for land in Shirenewton have been rejected by Monmouthshire, and 4 out of 5 of those proposals concerned land ADJACENT to the proposal for land adjacent to Redd Landes, namely:

CS0208 West Shirenewton, Recreation Hall Shirenewton

CS0218 Land at Ditch Hill Lane, Shirenewton (Option A)

CS0225 Land at Ditch Hill Lane, Shirenewton (Option B)

CS0226 Land at Ditch Hill Lane, Shirenewton (Option C)

CS0111 Adjacent to Thistledown Barn, Shirenewton

The reasons for rejection that you outlined in your document referenced below are STILL valid for CS02032, as nothing has happened to improve any of the challenges identified. Please see these reasons for rejection here:

<https://democracy.monmouthshire.gov.uk/documents/s39939/Appendix%206%20Initial%20Consultation%20Report.pdf>

I have a particular objection with regard to schooling. The proposed 26 houses would undoubtedly attract families to the village. Our catchment area also extends to Devauden, where there is another proposal for a further 20 houses (CS0214).

As Chair of Governors at Shirenewton School, I question the ambition to accommodate additional children. The school accommodates 210 pupils, split roughly 50% within catchment and 50% out-of-catchment. Presently the school is close to capacity. If the plan goes ahead, the LA is likely to need to bear the cost of transporting new in-catchment children to other schools in the cluster, whilst the out-of-catchment children continue through the school. Additionally, there is a precedent for siblings for out of catchment children to attend the school with older brothers and sisters.

There would also be a longer term concern over schooling capacity more widely in Chepstow, if other proposals underway in Chepstow, Caldicot and Caerwent go ahead without consideration to the number of school places available.

[REDACTED]

3685

Jason Barrett

Archived: 10 February 2025 12:09:22
From: [MCC - Planning](#)
Sent: Mon, 16 Dec 2024 12:04:58
To: [MCC - Planning](#) [MCC - PlanningPolicy](#)
Subject: FW: 20241211:- New Housing
Importance: Normal
Sensitivity: None

FYI

From: [REDACTED]
Sent: 15 December 2024 20:27
To: MCC - Planning <Planning@monmouthshire.gov.uk>
Subject: 20241211:- New Housing

Dear Sir/Madam

I would like to register my objection to the new housing proposed alongside the A466 at Chepstow. The extra traffic at High Beech Roundabout will be unacceptable, this roundabout is a pinch point for traffic on the A48 Newport Road which already sees daily tail backs and traffic jams causing significant delays .Also, there is a clean air monitoring system on the A48 at Hardwick hill as the area already suffers from pollution what would the extra traffic do to those levels ? not to mention the lack of access to GP's and Dentist appointments hard to get now getting harder the mor people you try and squeeze into an already overcrowded town .

[REDACTED]

3686

Jay Benham

Archived: 10 February 2025 12:04:58

From: [REDACTED]

Mail received time: Wed, 11 Dec 2024 11:32:58

Sent: Wed, 11 Dec 2024 11:32:44

To: [MCC - PlanningPolicy](#)

Subject: David Broome Development

Importance: Normal

Sensitivity: None

I am writing to object to the addition of the initial 770 houses mark for the Brown field sites at the David Broome Site. I've lived in Caldicot for 39 years then moved to Portskewett for the last 11 years. Starting with Caldicot, this has seen a massive deterioration in conditions of the infrastructure, the 'village/town' is almost useless if you want anything else that your food shop, place a bet or go to the charity shops etc, all banks have gone, veg shops gone, no where apart from factory shop to get anything useful etc. Portskewett is a 1 pub 1 spar shop community. 1 small junior school which for the time my youngest boy needed school could not get into, year after year of trying was full, which will not withstand another potential 770 families worth of children Appling. I had to transport back and forth to Shirenewton school ! which was a good school but limited his social education in the community.

I am also aware of the increased traffic in the area, not just because of the development in elder wood park, Portskewett but overall. Pedestrian routes from this estate to Caldicot etc is via a pathway on the VERY busy B4245, for the proposed site this is the only route, not acceptable with the pollution risk. There will be no social infrastructure, an increase in water and sewerage run off to drains, massive nature/wildlife impact. One point which is obvious is the Nedern Brook, which is at the moment absolutely flooded covering acres of land from the castle to this proposed site stretching all the way to Caerwent. This happens year after year with little or no preventative maintenance or clearing of the brook of the small sluice gates or the auto larger gate at the Estuary. (which is completely under valued), I cannot believe a plan is in place to build on a known flood area. This proposed site in my opinion is not a viable extension to either Caldicot nor Portskewett.

[REDACTED]

3687

Jeremy Miles

From: [REDACTED]
Sent: Thu, 12 Dec 2024 22:37:20
To: [MCC - PlanningPolicy](#)
Subject: CSO270 site Dixon Road
Importance: Normal
Sensitivity: None
Archived: 10 February 2025 11:58:38

Haven't Monmouthshire County Council heard of climate change. The last thing we need is another 270 homes at Dixon polluting our water supply and increasing congestion on our roads. We need less homes not more to prevent climate change. I understand many of these homes will be social housing unfortunately [REDACTED]. There is very little employment in the area so where would these people work, the answer is that many of them won't work. [REDACTED]. Obviously we can't afford to lose productive farmland however ever a huge amount of money will be involved in this development and [REDACTED]. Destroying our beautiful town would be nothing short of a disgrace. Properties in the area would also be devalued. It would also make farming very difficult in the surrounding area because of more people and dogs, [REDACTED] but we all have to eat. An alternative site should not be required because we already have enough people in Monmouth for the existing infrastructure. [REDACTED]
Sent from my iPhone

3688

Jess

[REDACTED]

From: [REDACTED] >
Sent: 15 December 2024 09:28
To: MCC - PlanningPolicy
Subject: Re: Planning Application- Proposed Development of 270 Houses on Dixon Road

This email expresses serious concerns regarding the proposed development of 270 houses on Dixon Road. I believe this development poses significant risks to the environment, public health, and the local community.

1. Water Quality Concerns:

- **Runoff Pollution:** The clay soil in this area is prone to high levels of surface water runoff. The proposed development, with its increased impervious surfaces (roads, driveways, roofs), will exacerbate this problem. This will lead to increased pollution in local waterways due to the runoff carrying pollutants such as oil, fertilizers, and other harmful chemicals.
- **SUDS Ineffectiveness:** Sustainable Drainage Systems (SUDS) are unlikely to be effective on clay soils. The high clay content can impede water infiltration, leading to SUDS becoming overwhelmed and failing to adequately manage stormwater runoff.
- **Sewer Capacity:** The existing sewer infrastructure may be insufficient to handle the increased wastewater load from 270 additional homes. This could lead to sewage overflows, posing a serious risk to public health and the environment.

2. Air Quality and Traffic Congestion:

- **Increased Traffic:** The development will inevitably lead to increased traffic on Dixon Road, exacerbating existing congestion and air quality issues.
- **Air Pollution:** Increased traffic will result in higher levels of vehicle emissions, including harmful pollutants such as nitrogen dioxide and particulate matter, negatively impacting the health of local residents.

3. Environmental Impacts:

- **Loss of Farmland:** The development will result in the loss of valuable agricultural land, impacting local food production and the rural character of the area.
- **Habitat Loss:** The proposed development poses a significant threat to local wildlife, including potentially impacting the habitat of rare bats.
- **Flooding Risk:** 15% of the site being prone to flooding raises serious concerns about the safety and long-term viability of the development.

4. Community Impact:

- **Overburdened Infrastructure:** The development will place additional strain on local schools, healthcare facilities, and other essential services.
- **As a pedestrian, it's already impossible to walk down Dixon Road without seeing a speeding car. A speed camera would greatly raise council revenue. How would an access road be safe for people when the traffic already does 40mph regularly?**

I urge the council to carefully consider these concerns and reject this planning application. The potential negative impacts on the environment, public health, and the local community are simply too great to ignore.

I request that the council undertake a thorough and independent environmental impact assessment to fully assess the risks associated with this development.

[REDACTED]

From: [REDACTED]
Sent: 15 December 2024 09:37
To: MCC - PlanningPolicy
Subject: Planning objection dixon

This email expresses my **strong objection** to the proposed development of 270 houses on Dixon Road due to its severe and unacceptable environmental impacts.

- **Loss of Agricultural Land:** The development will result in the irreversible loss of valuable agricultural land, impacting local food production and contributing to the decline of rural landscapes.
- **Habitat Destruction:** The development will significantly impact local wildlife, including potentially damaging habitats for rare bat species.
- **Increased Pollution:** Increased traffic and construction activity will lead to increased air and water pollution, harming both human and environmental health.
- **Flooding Risks:** A portion of the site is prone to flooding, raising serious concerns about the long-term sustainability and safety of the development.

I believe the environmental costs of this development are far too high. I urge the council to **reject this planning application** and prioritise environmentally sustainable development options that minimise harm to the local ecosystem.

[REDACTED]

From: [REDACTED]
Sent: 15 December 2024 09:37
To: MCC - PlanningPolicy
Subject: Planning objection dixon

This email expresses my **strong objection** to the proposed development of 270 houses on Dixon Road. I believe this development is inappropriate for this location and will have significant negative impacts on the local community and environment.

- **Traffic Congestion:** The development will inevitably generate a substantial increase in traffic, leading to severe congestion, increased air pollution, and safety hazards.
- **Environmental Impacts:** The development will result in the loss of valuable agricultural land, potential harm to wildlife, and increased pressure on local infrastructure.
- **Impact on Quality of Life:** The increased traffic, noise, and disruption caused by the development will significantly diminish the quality of life for existing residents.

I urge the council to **reject this planning application** and consider alternative development proposals that are more suitable for this location and have a less detrimental impact on the local community and environment.

[REDACTED]

From: [REDACTED]
Sent: 15 December 2024 09:39
To: MCC - PlanningPolicy
Subject: dixon development objection

This email expresses serious concerns regarding the potential for the proposed development to significantly degrade air quality in the local area.

- **Increased Traffic:** The development will inevitably lead to a substantial increase in traffic on Dixon Road.
- **Increased Vehicle Emissions:** This increased traffic will result in higher levels of vehicle emissions, including harmful pollutants such as:
 - **Nitrogen oxides (NOx):** Can contribute to respiratory problems.
 - **Particulate matter (PM):** Can penetrate deep into the lungs and cause serious health issues.
 - **Carbon monoxide (CO):** A poisonous gas that can reduce oxygen delivery to the body's organs.
- **Impact on Human Health:** Increased levels of these pollutants can have significant negative impacts on human health, particularly for vulnerable groups such as children, the elderly, and those with existing respiratory conditions.

I urge the council to reject the proposal due to the impact for residents.

[REDACTED]

From: [REDACTED]
Sent: 15 December 2024 09:40
To: MCC - PlanningPolicy
Subject: Dixton Road Planning Objection

This email expresses specific concerns regarding the potential impacts of the proposed development on local water quality.

- **Increased Surface Water Runoff:** The development, with its increased impervious surfaces (roads, driveways, roofs), will significantly increase surface water runoff. This runoff will carry pollutants such as oil, fertilisers, and other harmful chemicals into local waterways, potentially degrading water quality.
- **Ineffectiveness of SUDS:** The clay soil in the area is known to have poor drainage. Sustainable Drainage Systems (SUDS) may not be effective in managing the increased volume of stormwater runoff on this type of soil, potentially leading to increased pollution and flooding risks.
- **Potential for Sewer Overflows:** The existing sewer infrastructure may be insufficient to handle the increased wastewater load from 270 additional homes. This could lead to sewage overflows, posing a serious risk to public health and the environment.

I urge the council to thoroughly investigate these water quality concerns and prevent the development from taking place.

3689

Jess Cooper

Archived: 11 March 2025 07:42:30

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 09:34:38

Sent: Sun, 15 Dec 2024 09:34:24

To: [MCC - PlanningPolicy](#)

Subject: Planning objection to dixton road development

Importance: Normal

Sensitivity: None

This email expresses my **strong objection** to the proposed development of 270 houses on Dixon Road. I believe this development is inappropriate for this location and will have significant negative impacts on the local community and environment.

- **Traffic Congestion:** The development will inevitably generate a substantial increase in traffic, leading to severe congestion, increased air pollution, and safety hazards.
- **Environmental Impacts:** The development will result in the loss of valuable agricultural land, potential harm to wildlife, and increased pressure on local infrastructure.
- **Impact on Quality of Life:** The increased traffic, noise, and disruption caused by the development will significantly diminish the quality of life for existing residents.

I urge the council to **reject this planning application** and consider alternative development proposals that are more suitable for this location and have a less detrimental impact on the local community and environment.

Sincerely,

Archived: 11 March 2025 07:42:46

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 09:36:08

Sent: Sun, 15 Dec 2024 09:35:52

To: [MCC - PlanningPolicy](#)

Subject: Planning objection for dixton road development

Importance: Normal

Sensitivity: None

This email expresses my **strong objection** to the proposed development of 270 houses on Dixon Road due to its severe and unacceptable environmental impacts.

- **Loss of Agricultural Land:** The development will result in the irreversible loss of valuable agricultural land, impacting local food production and contributing to the decline of rural landscapes.
- **Habitat Destruction:** The development will significantly impact local wildlife, including potentially damaging habitats for rare bat species.
- **Increased Pollution:** Increased traffic and construction activity will lead to increased air and water pollution, harming both human and environmental health.
- **Flooding Risks:** A portion of the site is prone to flooding, raising serious concerns about the long-term sustainability and safety of the development.

I believe the environmental costs of this development are far too high. I urge the council to **reject this planning application** and prioritise environmentally sustainable development options that minimise harm to the local ecosystem.

Archived: 11 March 2025 07:41:53

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 09:31:32

Sent: Sun, 15 Dec 2024 09:31:16

To: [MCC - PlanningPolicy](#)

Subject: Re: Planning Application - Proposed Development of 270 Houses on Dixon Road

Importance: Normal

Sensitivity: None

This email expresses specific concerns regarding the potential impacts of the proposed dixon road development on local water quality.

- **Increased Surface Water Runoff:** The development, with its increased impervious surfaces (roads, driveways, roofs), will significantly increase surface water runoff. This runoff will carry pollutants such as oil, fertilizers, and other harmful chemicals into local waterways, potentially degrading water quality.
- **Ineffectiveness of SUDS:** The clay soil in the area is known to have poor drainage. Sustainable Drainage Systems (SUDS) may not be effective in managing the increased volume of stormwater runoff on this type of soil, potentially leading to increased pollution and flooding risks.
- **Potential for Sewer Overflows:** The existing sewer infrastructure may be insufficient to handle the increased wastewater load from 270 additional homes. This could lead to sewage overflows, posing a serious risk to public health and the environment.

I urge the council to thoroughly investigate these water quality concerns and ensure the development does not take place due to environmental concern.

Archived: 11 March 2025 07:42:11

From: [REDACTED]

Mail received time: Sun, 15 Dec 2024 09:33:14

Sent: Sun, 15 Dec 2024 09:32:59

To: [MCC - PlanningPolicy](#)

Subject: Planning Application - Proposed Development of 270 Houses on Dixon Road

Importance: Normal

Sensitivity: None

This email expresses my **strong objection** to the proposed development of 270 houses on Dixon Road. I believe this development will significantly exacerbate existing traffic congestion on Dixon Road and surrounding areas.

- **Increased Traffic:** The development will inevitably generate a substantial increase in traffic, including commuter traffic, delivery vehicles, and visitor traffic.
- **Congestion Impacts:** This influx of vehicles will severely worsen existing traffic congestion, leading to:
 - **Increased journey times:** For both residents and those traveling through the area.
 - **Increased air pollution:** From idling vehicles.
 - **Safety hazards:** Due to increased traffic density and potential for accidents.
 - **Reduced quality of life:** For existing residents due to increased noise and disruption.

I believe the potential negative impacts of this increased traffic significantly outweigh any potential benefits of the development. I urge the council to **reject this planning application** and consider alternative development proposals that do not pose such a significant threat to the local road network and the quality of life for residents.

3690

J Jones

From: [REDACTED]
Sent: Mon, 16 Dec 2024 21:39:08
To: [MCC - PlanningPolicy](#)
Subject: Objection to planning near Chepstow Roundabout
Importance: Normal
Sensitivity: None
Archived: 11 March 2025 09:11:34

Good Evening,

I have seen that there may be potential proposals for more housing planning on the fields just off the Highbeech roundabout in Chepstow.

I would oppose this planning due to the traffic issues Chepstow already faces with commute times increasing as well access to Chepstow becoming extremely congested at all times of day.

There has also been a significant increase in housing in Chepstow over the past few years e.g. down by Tesco, Elderwood estate in Caldicot as well as new planning for what was previously the David Broome site.

Chepstow does not have the infrastructure to support more housing especially at the expense of the greenbelt that makes Chepstow so beautiful.

Best wishes

[REDACTED]

3691

John Callicott

Archived: 10 February 2025 11:40:49

From: [REDACTED]

Mail received time: Sat, 14 Dec 2024 22:26:11

Sent: Sat, 14 Dec 2024 22:26:04

To: [MCC - PlanningPolicy](#)

Subject: Objection to the Building of 270 houses on site CS0270/HA4 Dixton Road / Leasbrook

Importance: Normal

Sensitivity: None

I wish to register my strong objection to the planned development of 270 on the above referenced site on the following grounds

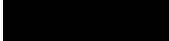
- 1) The development will be a blight on what is a beautiful natural landscape at the entrance to Wales.
- 2) It will cause significant ecological damage to an area which currently has a varied Bat and Bird population.
- 3) It will cause significant blockage to drainage from higher ground which is already poor.
- 4) The run off from more building on the banks of the Wye will add to the already unacceptable levels of river pollution.
- 5) There are not 500 vacancies in Monmouth so presumably most of the occupants of the proposed housing will be travelling 15 miles+ to find work, adding to pollution and traffic problems which will have a negative environmental impact.
- 6) There is a more appropriate site at CS2074 which is less damaging to the environment and ecology as well as having less impact on the natural beauty of the Wye valley. However it would make sense to bring the jobs ahead of the housing for the people who might take them.

[REDACTED]

3692

John Gilvear

PROPOSED INAPPROPRIATE PROPERTY DEVELOPMENT ADJACENT TO HIGHBEECH ROUNDBOUT

Att. 

I strongly object, this development is not in residents, Chepstow Town & may I say Wales best interest.

Immediate reasoning and common sense dictate it will be unwise to allow this large housing and commercial property development, immediately adjacent to this dangerous roundabout to take place. The Council must not ignore the greater good of the town and a travesty to allow its residents and existing infrastructure to be over whelmed and definitely bad management.

The other consideration to my mind is that, if allowed, once this development takes place, surely as night follows day the it will be the thin edge of a wedge for the developers to drive home for approval to expand and develop adjacent greenfield land.

The Council must recognise the M48 junction serves the larger part of East Wales and the Forest of Dean and beyond with Highbeech the traffic convergence point and the congestion adversely affects residents daily lives also air pollution cannot be ignored.

Further, to be positive, like any forward-looking country Wales needs tourist to help bounce the its economy and visitors from afar and abroad must be welcomed with open arms and their expectation must not blighted by such an in the face development.

In my opinion and without argument Chepstow is a gem that glistens with its Castle, Wye river bridge, facing cliffs and unique evidence and view of the twice a day Severn tide race, the 2nd . in the World, simply that entices visitors from England and other parts of UK and from abroad.

Essentially Chepstow an important gateway to the beautiful Wye Valley, Tintern and Monmouth, Brecon Beacons, Black Mountains and Wales at large.

Councillor's come and go but whilst in office have responsibility within remit to protect this corner of Wales against the ever commercial pressure of inappropriate development that include the sop of eg. few affordable houses, to ease development approval but this must not be allowed to outweigh residents best interest.

If the Council is bent on the development may I say from the housing aspect local people must come first before developers profit. Namely, in view of the heated debate I suggest that the application is held in abeyance and a compromise to be discussed with the developer whereby the 146 houses are to be inescapably truly "AFFORDABLE " with proven Chepstow people first in line to purchase and gladden many hearts.

However and finally it is in peoples best interest the Council rejects the proposal on the table out of hand.

thank you.

