



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit
Representations Register

Volume 19 - Site Promoter/Developer



monmouthshire
sir fynwy

1366	Carney Sweeney Ltd
1383	Taylor Wimpey (Boyer Planning)
1506	Morspan Pension Scheme
3480	Mr & Mrs Williams
3737	Mr Andrew Hazell
3824	Sentiem

1366

Carney Sweeney Ltd

View results

Respondent

432

Anonymous

33:20

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)

CarneySweeney Ltd

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

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

*

Key Issues and Challenge

Paragraph 3.1.5 - We agree that Water Quality in Riverine Special Areas of Conservation (SAC) is an appropriate 'Key Issues and Challenge' for the Replacement Local Development Plan (RLDP). We welcome the fact that DCWW have confirmed that a workable and achievable solution to phosphates has been identified for both the Monmouth Wastewater Treatment Works (WwTW) (benefitting the River Wye Catchment) and Llanfoist WwTW serving Abergavenny (benefitting the upper River Usk catchment). We welcome the firm commitment by DCWW to implement these improvements.

RLDP Vision

Page 24 - While we generally support the RLDP Vision, we do not believe that the well-connected, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all to be "exemplar affordable housing-led". We note that there is no definition contained within the RLDP (or national policy) which further explains what 'exemplar' means in this context. This could result in subjective decisions being made. To assist applicants and decision makers, we would therefore suggest that the term 'exemplar' is either further explicitly defined or the vision refers to 'a standard of good design' only. Furthermore, not all development needs to include affordable housing, still less to be led by it. To be affordable housing-led, schemes would need to be supported by public subsidy/grant, which cannot be guaranteed and is certainly not required to meet the RLDP's vision.

Objectives (pages 29-31)

Objectives 10 and 11 - We support the Council's objectives of achieving good design within housing schemes. We are, however, concerned over the use of the term 'exemplar'. We note that no other objectives require any 'exemplar' solutions, nor is there a definition contained within the RLDP (or national policy) which further explains what this term means. This could result in subjective decisions being made. To assist applicants and decision makers, we would therefore suggest that the term 'exemplar' is either further explicitly defined or the objectives refers to 'a standard of good design' only.

Objective 13

Building sustainable rural communities and strengthening the rural economy will require homes of all tenures, not just affordable homes. This objective should be reworded to read "To sustain existing rural communities as far as possible by providing homes (including affordable homes) and development opportunities..."

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

12. Is your representation in support or objection? *

☒ Support

☐ Objection

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

Policy S1 - Support is provided to the level of growth as set out in Policy S1 which outlines that the Plan will make provision for the delivery of 6,210 homes (including a flexibility allowance of 15%) to meet a housing requirement of 5,400 homes over the plan period.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy S2 - We welcome Grosmont's inclusion within Tier 4 of the settlement hierarchy where "minor infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDLP".

We note that Policy S2 states that "Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed for [certain] types of development". We agree that it is unnecessary for Tier 4 settlements to have defined settlement boundaries, however the current wording creates some ambiguity over whether a site is already 'within' a Tier 4 settlement or not. We believe that the following insertion could readily address this point:

"To be considered as being 'within' a Tier 4 settlement, a site must be capable of rounding off the settlement footprint or infilling of a small gap between existing buildings forming part of the settlement without having an unacceptable adverse impact on village form and character and surrounding landscape."

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

17. Would you like to comment on this question *

☒ Yes

☐ No

18. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy OC1 - We raise concern regarding the application of Policy OC1, specifically in respect to Tier 4 settlements and the point raised in respect of S2: we agree that it is unnecessary for Tier 4 settlements to have defined settlement boundaries, however the current approach in the RLDP creates some ambiguity over whether a site is already 'within' a Tier 4 settlement or not. We believe that the proposed insertion suggested under Question 3 above should be introduced to policy S2 to address this point and this would also assist with the application of OC1:
"To be considered as being 'within' a Tier 4 settlement, a site must be capable of rounding off the settlement footprint or infilling of a small gap between existing buildings forming part of the settlement without having an unacceptable adverse impact on village form and character and surrounding landscape."

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

20. 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)

21. Would you like to comment on this question *

☒ Yes

☐ No

22. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

Policy S4 - Support is provided to the Council's intention to deliver carbon neutral developments by 2030. We recognise that the policy follows the requirements that are forthcoming from the UK Government's target of achieving net-zero carbon by 2050. However, the planning system is not the appropriate or best mechanism to facilitate any improvements in energy efficiency standards within homes and buildings. In order to ensure consistency across Local Authorities across Wales, Building Regulations, rather than the plan making system, are the best vehicle to deliver these goals and keep them both relevant and up to date over time. As such, criterion (ii) should be amended to read:

"Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through orientation design principles;"

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)

24. Would you like to comment on this question *

- ☒ Yes
- ☐ No

25. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

We wish to highlight a misinterpretation of PPW that has been made within the RLDP in respect of Green Infrastructure Assessments (GIA) which is a duty placed on LPAs (not developers) to undertake.

PPW introduces GIAs at 6.2.5. Here it clearly states that "Planning authorities must, as part of adopting a strategic and proactive approach to green infrastructure, biodiversity and ecosystems resilience, produce up-to-date inventories and maps of existing green infrastructure and ecological assets and networks. Local authorities may already be undertaking such assessments and/or preparing such information to underpin local authority-wide green infrastructure strategies and where this is the case planning authorities should both contribute to this process and use the inventories and mapping to underpin a spatial approach in their development plans. Green Infrastructure Assessments provide key evidence to support the preparation of development plans and where authorities are not already actively undertaking assessments, they should be undertaken as part of development plan preparation".

PPW paragraphs 6.2.6 to 6.2.10 continue to explain how Planning Authorities should prepare and utilise their GIAs. Nowhere in this section does it suggest that developments/developers need to provide GIAs.

At PPW paragraph 6.2.14, under the section which introduces Green Infrastructure Statements (GIS) (which definitely are the developer's responsibility), PPW does state that "Development proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance". Here, again, it is clear that the GIA is something to be produced by the planning authority.

Para 10.1.6 - MCC introduce GIAs and appear to imply that development proposals need to demonstrate adherence to PPW12 and the Section 6 duty (which is itself a duty on the LPA) and to do this through a GIA. This is not correct. The GIS is the vehicle for developers to demonstrate adherence to PPW, the stepwise approach and the delivery of a net benefit for biodiversity. The GIA informs this statement but needs to have already been prepared by the LPA. Indeed, in the terms set out in PPW, the plan itself should be underpinned by the GIA, so MCC should have already prepared it (or be preparing it).

Policy S5 - again references GIA and implies that this will be prepared as part of the development proposals. This should be reworded to be clearer that GIAs, prepared by the Council, will be referred to in the preparation of development proposals and GISs.

Policy GI1 – Criterion (a) specifically demands a GIA be submitted with all major development applications. This is not in line with PPW and should be changed to reference a GIS only. As currently drafted, policy GI1 (and its associated supporting text) seems to effectively require a GIA and a GIS with all major applications which is not in accordance with the intention of PPW. The GI policies therefore appear confused and need to be revised and reworded to conform with PPW.

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

27. Would you like to comment on this question *

☒ Yes

☐ No

28. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy S6 – The policy outlines that “where possible, infrastructure improvements should be provided prior to occupation”. Whilst the policy appears to include a degree of flexibility, the policy wording should further clarify that the delivery of infrastructure improvements (or contributions thereto) should be subject to an agreement over the timings/triggers associated with the development. These should be commensurate to the type and scale of development and secured via a S106 agreement and/or by condition at application stage.

**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)**

30. Would you like to comment on this question *

☒ Yes

☐ No

31. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy S7 – This policy states that (inter alia) for sites of 1 to 4 homes, financial contributions will be required towards the provision of affordable housing in the local planning authority area and will be required in accordance with details set out in the Affordable Housing Supplementary Planning Guidance. The policy should note that this requirement is subject to financial viability of the proposed scheme. Furthermore, the Affordable Housing Supplementary Planning Guidance is, naturally, supplementary to the current LDP, not the RLDP. We therefore reserve our position on this until such time as the new SPG is drafted and consulted on.

Policy H3 - We welcome the overarching principle of Policy H3 which states "In the following Minor Rural Settlements [including Grosmont] planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings, of no more than 1 or 2 dwellings, or residential redevelopment, ... subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape,..." However, we do not consider the words "of no more than 1 or 2 dwellings" should be included in the policy wording. Such wording is overly prescriptive and unhelpful – it is the village form and the character of the landscape which are the relevant considerations, not the exact number of dwellings. Removing those words would leave the policy undiminished, still allowing only "minor small scale rounding off or infilling" which, in itself, limits the number of dwellings likely to be able to be achieved. Furthermore, the removal of this reference to "1 or 2 dwellings" would allow the optimisation and efficient use of suitable sites where the provision of more than 2 dwellings may be deemed to be acceptable if it can be demonstrated by the applicant that they would not cause material harm to the village form and character or surrounding landscape. As such, the opening paragraph of Policy H3 should be amended to read:

"In the following Minor Rural Settlements planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings. Development will be limited to residential development, or conversion to residential or subdivision of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the RLDP that seek to protect existing retail, employment, community uses and tourism."

Policy H9 - We note that Policy H9 states "Favourable consideration will be given to the siting of 100% affordable housing exception sites adjoining Tier 1, 2, 3 and 4 settlements identified in Strategic Policy S2, that would not otherwise be released for residential development..." However, as noted above, Tier 4 settlements do not have defined settlement boundaries. As such, it is not clear how a site could "adjoin" a tier 4 settlement (as opposed to being within the settlement or outside of it) and neither is it clear how it would be established that such a site "would not otherwise be released for residential development". We believe that text should be introduced to address this point and suggested the following:

"To be considered as adjoining a Tier 4 settlement, a site must abut existing curtilages forming part of the settlement."

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

33. 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)**

34. Would you like to comment on this question *

☐ Yes

☒ No

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

35. Would you like to comment on this question *

☐ Yes

☒ No

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

36. 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)**

37. 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)**

38. 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)

39. 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)

40. 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?

41. 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>

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

☐ Yes

☒ 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): *

As set out in these representations, the wording of certain policies is at odds with National Policy and in some instances results in confusion which will result in those policies being ineffective. Altered wording has been suggested as appropriate.

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.

45. 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

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

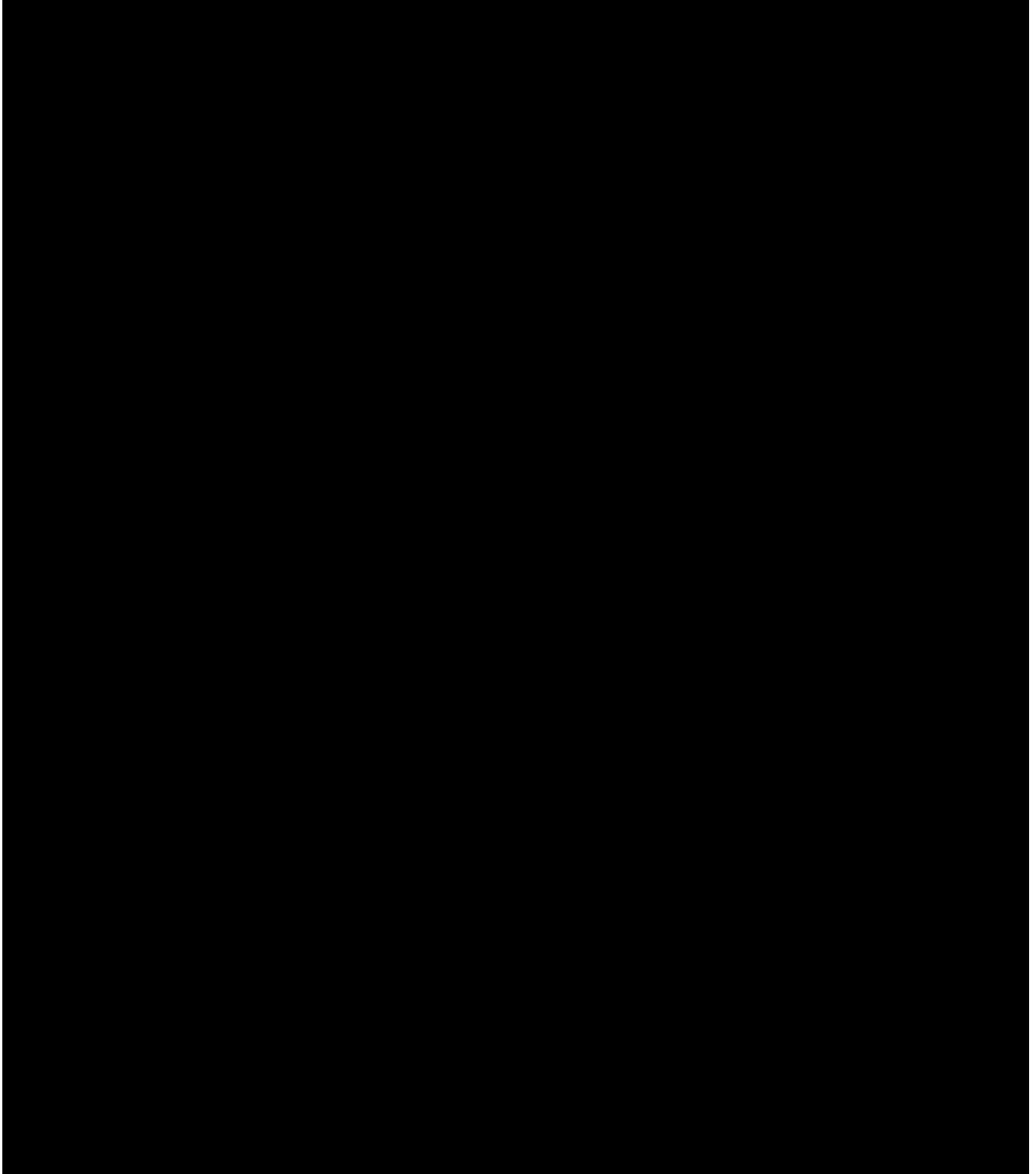
☐ Welsh

☒ English

Part 5: Welsh Language

47. 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?

48. 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?



1383

Taylor Wimpey



**Office
Use Only**
Representor
Number

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

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 Rhadyr, 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)	Taylor Wimpey (TW)	Boyer Planning
Address:		
Telephone No:		
Email:		



Part 2: Your Representation

Office
Use Only
Represent
tor
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.

Taylor Wimpey (TW) agree in principle that Monmouthshire is subject to a number of challenges which have caused significant delay in the plan making process, and note the vision. Through the further questions TW provide comments, objections and support for varying elements.

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:

Object

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.

Strategic Policy S1 sets out the Council's Preferred Growth Strategy, which is based on a demographic-led scenario and proposes a housing provision of 6,210 homes (which includes a 15% flexibility allowance) to meet a housing requirement of 5,400 homes for the plan period 2018-2033.

Whilst TW support, in principle, the increase from the 2023 Preferred Growth Strategy (5,940 homes which included a 10% flexibility allowance to meet a housing requirement of 5,400



homes), this is a considerable reduction from the previous 2021 Preferred Strategy amount of 8,366 homes for the plan period 2018-2033, of which 3,658 homes were proposed to be allocated through new sites.

The revised draft Policy S1 now proposes for 1,320 – 2,130 new homes to come forward as allocated sites, as 4,080 homes comprise a landbank figure of existing commitments. Given the delays that have occurred, the landbank figure is increasing and consequently diminishing the required allocations. The delays, in part, have been caused by COVID-19, phosphates, as well as the intervention from Welsh Government, which resulted in further consultation and revised figures.

Therefore, TW consider it necessary for the plan period, currently set at 2018-2033 to be rolled forward to 2021-2036. Moreover, to ensure the consistent delivery of dwellings, it is considered that additional sites (resulting in a 20% flexibility allowance) should be allocated within the Draft LDP to provide a contingency, should some allocated sites fail to be delivered at the rate set out within the housing trajectory. This would ensure the consistent delivery of homes throughout the Plan period.

Consequently, the Authority should consider the need for a higher provision of housing and additional allocations (in particular Candidate Site CS0078- Land adjacent to Croft y Bwla) to accommodate the additional two years for the plan period and the increased 20% flexibility.

Monmouthshire County Council (MCC) have noted that they consider that the Preferred Strategy meets the 'Tests of Soundness' and so is in general conformity with Future Wales 2040. According to the Planning and Compulsory Purchase Act 2004 and set out within National Planning Policy, there is a fundamental requirement for any Local Development Plan to be found sound. To ensure that this policy meets the tests of soundness and is justified, and effective, additional growth should be allocated across the remainder of the County to ensure the consistent delivery of dwellings across the Draft LDP period. To this end, TW consider the lack of deliverability of certain housing allocations results in the RLDP being unsound as it fails the Council's own Test of Soundness in respect of:

- Test 2 the housing allocations in the southern part of the county are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales (PPW).



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:

Support

Objection:

Object

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.

Strategic Policy S2 seeks to focus new development on the primary settlements of Abergavenny (including Llanfoist), Monmouthshire, Chepstow and Caldicot including the Severnside area. The Sustainable Settlement Appraisal (December 2022), which forms the evidence base of Policy S2, highlights the dominant role of the primary settlements, including Monmouth, and describes *"the relative self-containment of these settlements compared to other settlements within the County justifies their classification as Primary Settlements which can be maintained and strengthened through future sustainable development."*

In principle TW support the recognition of Monmouth as a Primary Settlement and agree that it is an appropriate location for future growth and development. TW note that following the Preferred Strategy the Deposit Plan now seeks to provide a distribution of 15% (923 dwellings) of residential growth within Monmouth.

Whilst TW support this increase from the previous 0% distribution, questions are still raised in relation to the amount of growth proposed, as well as those allocations which seek to provide it.

As noted, TW support the MCC Sustainable Settlement Appraisal and in particular that Monmouth has been categorised as a 'Primary Settlement' and so a sustainable location for future development. To this end, given Monmouth's role and function, TW consider that the proportion of growth needs to be increased to match that of Abergavenny as a minimum (22% / 1,362 dwellings).

TW are fully aware of the situation regarding the Welsh Government's previous representations to the Preferred Strategy, and the implication on the plans level of growth, as detailed at Question 1.

In this regard, and whilst also supporting a higher level of growth than proposed, TW consider that there are serious concerns regarding some current allocations, and that those numbers should be redistributed.

In particular, TW raise issues with Policy HA1- Land to the East of Abergavenny and Policy HA4- Land at Leasbrook, Monmouth. Full details of why the sites are unsuitable for allocation are provided within Question 10.



To this end, TW are of the view that clear evidence has been provided to confirm that specifically Candidate Site CS0078 (Land adjacent to Croft y Bwla) can be allocated within Monmouth, under Policy S2 in accordance with the status of a Primary 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:

Support

Objection:

Object

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.

Whilst TW have no specific comments in relation to the requirements of Policy OC1- New built development in the Open Countryside, there is comment in regard to the Settlement Boundary Review which facilitates the above policy.

In particular TW raise significant concern given the guiding principles used to provide a consistent approach to the review of the settlement boundaries, which included the fact that *'Isolated or sporadic development, which is clearly detached from the settlements should, however, be excluded from the boundary'*.

In this regard TW object to the boundary changes proposed at 151- Land to the East of Abergavenny (adjusted boundary to include Residential Allocation HA1) and 18 - Leasbrook Dixon Rd (adjusted boundary to include Residential Allocation HA4). Both of these boundary changes, despite being done so to allow for allocations, are clearly detached from the settlements. In particular, Land to the East of Abergavenny results in an incongruous settlement boundary which is clearly separated from Abergavenny by the A465 and railway line, whilst Leasbrook now incorporates the Haberdashers' Monmouth Prep School and playing fields.

In both instances TW objects to their settlement boundary amendment and consider that they are contrary to Test of Soundness 3 in that they will result in sites, which due to their location, will not be appropriate to deliver.

- TW have no comments on Policy GW1 – Green Wedge Designations



**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:

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.

TW broadly agree with the wording and thrust of emerging Strategic Policy S3 – Sustainable Placemaking & High Quality Design and Policy PM1 – Creating well-designed places. TW consider that Candidate Site CS0078 (Land adjacent to Croft y Bwla) would accommodate the principles of both policies within the Candidate Site presenting an opportunity for a logical continuation of existing and planned residential development in Monmouth.

The Candidate Site is located within a sustainable location close to a number of facilities and good transport links. Furthermore, an indicative masterplan has been prepared by Think Urban architects illustrating the site accommodating up to 300 dwellings, open space, play space provision, landscaping and associated infrastructure. This proposed scale of development would accord with the above policies in terms of the scale of strategic site required to deliver the housing requirement.

- TW have no comments on Policy PM2– Environmental Amenity
- TW have no comments on Policy PM3 – Advertisements
- TW have no comments on Policy HE1 – Conservation Areas
- TW have no comments on Policy HE2 – Design of Shop Fronts in Conservation Areas
- TW have no comments on Policy HE3 – Roman Town of Caerwent



**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:

Support

Objection:

Object

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.

Strategic Policy S4 – Climate Change, sets out a range of measures and criteria for developments to address the cause of and adapt to the impacts of climate change. In principle, TW wishes to work to help contribute towards MCC's Climate and Decarbonisation Strategy and Action Plan, which sets out broad objectives and actions to deliver a net reduction in carbon emissions to net zero by 2030 and address the water issues in the County.

Sustainability is at the heart of each and every scheme that TW designs and delivers. This is demonstrated through the use of sustainable modes of transport, sustainability within the design of buildings, or indeed the actual proportions of Green & Blue Infrastructure. This is demonstrated in the indicative masterplan prepared by Think Urban architects Candidate Site CS0078 for illustrating the site accommodating up to 300 dwellings, open space, play space provision, landscaping and associated infrastructure.

In terms of specifics within Strategic Policy S4, TW support the prioritisation of fabric first as per criteria (ii), and also notes that criteria (iv) requests developments to utilise sustainable construction techniques and local supplies through the adoption of the circular economy principles where possible.

TW fully supports emerging policies seeking to tackle climate change with proactive sustainable measures. However, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The proposed policy, however, should be flexible to allow developers to utilise the most appropriate technology available at that time, whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.

As for criteria (vii) proposing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality; TW is supportive of the encouragement for the use of electric vehicles (EV) and is in support of Strategic Policy S4 in this respect. In regard to residential development, TW supports the principle of ensuring that infrastructure is correctly implemented in new dwellings to support the ability of residents to charge EVs.

Moreover, TW recommends that the Council acknowledges the diversity of different charging speeds depending on the type of vehicle and charging location. At present, there are many different types of EVCP infrastructure depending on the manufacture of the EV. As such, one EVCP may not suit the EV demands of all future residents. This reflects the fact that the EV market is still at a relatively early stage but is becoming increasingly diverse. Moreover, one



disadvantage of installing EVCPs across an entire development is that there is a significant level of uncertainty over how much infrastructure will be required by when.

TW considers that a planning policy that requires the provision of underground cabling and/or ducting for an EVCP is put in place. This would allow for the proportional expansion of the charging network in the future as demand grows, with minimal disruption and additional cost for excavation and labour. This would allow residents to easily install the necessary EVCP required to meet their needs as when this is required; a process that does not require planning permission and can be done through Permitted Development Rights.

TW do not dispute the Council's climate change emergency declaration and agree that there is a need for new development to contribute to significant reductions in CO2 emissions. TW raise concerns, however, whether this policy requirement is supported by a relevant evidence base and appropriate viability assumptions to ensure it is justified and meets the test of soundness.

Whilst TW recognise the proposed ambition of Policy NZ1, it is noted that Future Housing Standards (FHS) is due to be implemented in 2025 aiming to eliminate dwellings' reliance on fossil fuels, instead using low carbon energy sources, such as heat pumps and other renewables. TW will clearly comply with these regulations and national requirements, although question the need to currently step beyond the FHS.

Furthermore, TW highlight how applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of Planning Policy Wales, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. TW consider that the scope of Policy NZ1 needs to be both amended to align it with national guidance, whilst also reflecting FHS.

TW consider that Policy CC1 – Sustainable Drainage Systems is not specifically required as it is a repetition of requirements set out within the Flood and Water Management Act 2010. Furthermore, TW consider that the way the policy is currently worded is inaccurate with the assumption that all development requires Sustainable Drainage Systems. Only at supporting paragraph 9.3.7 is it clarified that SuDs drainage proposals are required for all new development over 100 m2 of construction area.

However, TW also note that the policy is seeking to extend beyond the requirement of the Flood and Water Management Act 2010 at supporting paragraph 9.3.8 where it is stated that *'regardless of size, there will still be an expectation that sustainable drainage methods are incorporated into a scheme where practicable. Policy CC1 therefore, seeks to ensure that development below the SAB size threshold noted above also implement the effective management of surface water drainage through SuDS features'*. TW consider that the policy is either removed or reworded to reflect the legislative requirements.

- TW have no comments on Policy CC2 – Renewable Energy Allocation
- TW have no comments on Policy CC3 – Renewable Energy Generation



**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:

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.

TW support the principle of Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery, though note that criteria outlined for development proposals needs to be assessed on an individual basis, as in some instance they may not be appropriate or viable.

Again, TW agree in principle with Policy GI1 – Green Infrastructure and in particular that a GI Statement will be proportionate to the scale, nature and complexity of the development proposed. TW do question if the policy is required altogether as it a repetition of national planning policy – Planning Policy Wales (12th Ed 2024).

- TW have no comments on Policy GI2 – Trees, Woodland and Hedgerows
- TW have no comments on Policy LC1 – Landscape Character
- TW have no comments on Policy LC2 – Blaenavon Industrial Landscape World Heritage Site
- TW have no comments on Policy LC3 – Bannau Brycheiniog National Park
- TW have no comments on Policy LC4 – Wye Valley National Landscape (AONB)
- TW have no comments on Policy LC5 – Dark Skies and Lighting
- TW have no comments on Policy NR1 – Nature Recovery and Geodiversity
- TW have no comments on Policy NR2 – Severn Estuary Recreational Pressure
- TW have no comments on Policy NR3 – Protection of Water Sources and the Water Environment
- TW have no comments on Policy PROW1 – Public Rights of Way

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

Support:



Is your representation in support or objection?	Objection:	Object
<i>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).</i> <i>If you are objecting, please state how you would like the Plan to be changed.</i> TW question if Strategic Policy S6 – Infrastructure is required as physical, community and green/blue infrastructure will be assessed on an individual site basis and secured via legal agreements entered into under Section 106. Where specific infrastructure is required for allocated sites then this information is most relevant in that policy. • TW have no comments on Policy IN1– Telecommunication, broadband and other digital infrastructure		

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:	Support
	Objection:	Object
<i>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).</i> <i>If you are objecting, please state how you would like the Plan to be changed.</i> Strategic Policy S7 outlines the affordable homes target for the Plan period of 2018 – 2033 is 1,595 – 2,000 homes and that on-site provision of 50% affordable homes is required on all new site allocations and sites of 20 homes and over within existing settlement boundaries as identified in Tiers 1-3. In response to above, TW acknowledge the County’s affordable housing requirement and are more than willing to collaboratively work with the Council to help meet this need. In previous representations TW highlighted that the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments in accordance with Paragraph 4.2.31 of PPW which states, ‘<i>when setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.</i>’		



TW note that viability information has been submitted in the evidence base in relation to proposed allocations and cannot disagree with the information provided by developers/landowners. However, as previously noted, it is envisaged that the delivery of 50% affordable homes on larger scale new allocations will require financial assistance from Welsh Government for it to be realistic.

To this end, TW still consider that, without the intervention of the Welsh Government, the affordable housing threshold of 50% will significantly impact site viability which runs the risk of residential sites becoming undeliverable.

TW support the identification of Monmouth as a Primary Settlement within Policy H1 – Residential Development in Primary and Secondary Settlements, though question the proposed Allocations at both East Abergavenny and Leasbrook and have concerns over their delivery in the current plan period.

TW agree with the requirement of Policy H8 – Housing Mix that developments should provide a range and mix of house types, tenure and size. However, concern is raised in relation to the supporting text at 12.10.5 which suggests that the Authority are engineering the housing mix, rather than allowing the market/developers knowledge to have influence. In particular concern is raised as *‘Priority will be given to the provision of small to medium size homes of 3 bedrooms or fewer. Proposals that predominately consist of large detached market properties of 4 bedrooms or more will not be supported’*.

TW also raise concerns in regard to having to the timing of agreement of a supporting statement providing the proposed housing mix, as this will have site viability impacts.

- TW have no comments on Policy H9– Affordable Housing Exception Sites
- TW have no comments on Policy H2 – Residential Development in Main Rural Settlements
- TW have no comments on Policy H3 – Residential Development in Minor Rural Settlements
- TW have no comments on Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use
- TW have no comments on Policy H5 – Replacement Dwellings in the Open Countryside
- TW have no comments on Policy H6 – Extension of Rural Dwellings
- TW have no comments on Policy H7 – Specialist Housing
- TW have no comments on Strategic Policy S9 – Gypsy and Travellers
- TW have no comments on Policy GT1 – Gypsy, Traveller and Showpeople Sites

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



Is your representation in support or objection?	Support:	
	Objection:	Object

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.

In principle, TW support Strategic Policy S8 – Site Allocation Placemaking Principles, though again highlight some further suggestions. The suggestions relate back to Question 9 and the provision of affordable housing, as well as the housing mix.

Policies HA1-HA18

Policies HA1 – HA18 set out the Council’s residential site allocations which intend to meet Monmouthshire’s housing requirement over the proposed plan period. According to the RLDP TW understand these sites have been identified to sustainably expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth. Whilst TW support the general approach adopted by MCC, upon further review concerns remain regarding the deliverability of two sites in particular, namely: i) Policy HA4 – Land at Leasbrook, Monmouth; and ii) Policy HA1 – Land East of Abergavenny.

For completeness both of which shall be discussed in further detail to highlight the risks associated with their continued inclusion as proposed site allocations and in doing so MCC’s ability to meet the housing needs of the local community over the emerging plan period.

Policy HA4 – Land at Leasbrook, Monmouth

TW have concerns regarding the site’s suitability to accommodate future development. This is derived on the basis that Land at Leasbrook represents an illogical extension to the existing settlement of Monmouth and effectively leap frogs the playfields associated with Haberdashers’ Prep School. The latter creates a natural boundary along the eastern edge of Monmouth and currently enables MCC to avoid speculative development coming forward further east. Allocating future development on Leasbrook would therefore undermine MCC’s position in that regard and arguably set a precedent for allowing development in a location which would encroach upon the open countryside.

Whilst TW supports MCC’s approach to prioritise site allocations in areas sustainably located on the edge of primary settlements such as Monmouth, it is important they represent logical extension to the defined urban areas for the purposes of soundness. Given its position adjacent to the northern fringe of Monmouth, Land at Croft Y Bwla satisfies such criteria and would ensure future housing is delivered in an area of greatest need. Furthermore, as explained within the Deposit Plan this particular location has already been established as acceptable for future residential development by virtue of the existing planning permission and subsequent allocation associated with HA6 – Land at Rockfield Road. These characteristics demonstrates the fact the proposed site is well served by existing infrastructure and provides an opportunity to facilitate further improvements, either individually and/or in collaboration with developers on neighbouring sites, in the interest of



facilitating further improvements for local people which goes to heart of good placemaking. These principles fully accord with Future Wales 2040 and PPW12, and reiterate the fact that allocating future residential development at Croft Y Bwla would help contribute to achieving a more sustainable and efficient pattern of development.

According to the Updated Landscape Sensitivity Study (October 2020) which supports the RLDP, Land at Leasbrook is identified in an area with high-medium value from a landscape perspective. Although TW's land interests are also technically considered to fall within the same category, due to the local topography the site at Leasbrook is notably more susceptible to viewpoints further afield which is exacerbated by its natural openness. On that basis its evident Leasbrook makes a more significant contribution to the character of the local area and therefore allocating future development on which would potentially undermine the purpose of which from a landscape perspective. This brings into question whether Land at Leasbrook meets the relevant criteria in order to warrant inclusion with the emerging RLDP when there are more suitable sites available equally capable of delivering residential development over the plan period.

TW notes the Indicative Masterplan for Leasbrook within the Deposit Plan suggests supplementary planting could be provided along the eastern edge of the site. Whilst we appreciate this has been led by the desire to reduce the sites visual prominence within the surrounding area. Even with such mitigation in place it shall remain one of the most pronounced parcel of land within the local landscape by virtue of its geographic location, sloping topography and natural openness. Collectively these factors mean any future development would be susceptible to views within the wider vicinity including the Way Valley AONB which lies on the opposite side of the A40.

In terms of the latter, NRW's Designated Landscapes Plan (2022) indicates there is a strategically important viewpoint located around 1.5km south of Leasbrook (Ref. W1- The Kymin Naval Temple/ Offa's Dyke Path). This provides panoramic views looking back towards the southern and eastern parts of Monmouth further emphasising the fact that the proposed allocation at Leasbrook will negatively impact the character of the local landscape. Moreover, the difference in elevation and local topography demonstrates that in reality irrespective of the mitigation measures able to be accommodated on site any future development on Land at Leasbrook will have a detrimental impact on the character of the area.

In comparison to the above, Croft Y Bwla's position on the northern periphery of Monmouth means it benefits from being naturally well screened by existing vegetation and physical features. The former will be further enhanced through a comprehensive planting scheme which provides an opportunity to create a new defensible boundary further north in order to prevent more sensitive areas from encroachment as a result of speculative applications for piecemeal development. The proposed inclusion of Land at Croft Y Bwla's within the RLPD is therefore crucial in assisting MCC strategically manage the urban form of Monmouth whilst ensuring development aligns with MCC's Spatial Strategy and growth aspirations for the region.

PPW12 states that ensuring the delivery of well-designed and sustainable places is of upmost importance. A key theme of which is ensuring proposed sites are accessible by a range of active travel and public transport networks. As explained within the Preliminary Transport Strategy (August 2021) prepared by Miles White Transport Ltd, given its location Croft y Bwla



is already well connected to a series of footpaths and cycleways within the immediate vicinity.

Moreover, the proposed layout has been designed to capitalise upon these opportunities by prioritising active travel routes through the centre of the site to encourage future resident to use such facilities. The combination of which means the site remains within a 20 minute walk/7.5 minute cycle ride of the town centre where there are a number of local services. These principles fully accord with Welsh Governments objectives and in doing so shall enable residents to access local facilities such as schools, shops and healthcare providers, whilst reducing the current reliance on private vehicles along with the associated carbon emissions.

By contrast, Land at Leasbrook does not benefit from access to any existing cycle paths. Whilst the overall walking distance to the town centre is similar to that associated with the Croft y Bwla the route is less attractive and there are few facilities lie within a 20 minute walking radius. This highlights the fact that the delivery of Leasbrook is dependent on more significant infrastructure improvements coming forward in order to achieve a level of connectivity comparable to Croft y Bwla. From experience the financial implications of which inevitably impacts the viability of any scheme, and on occasions can lead to significant delays in housing delivery, especially earlier on during the plan period. As such it is important MCC recognises the benefits Croft y Bwla can provide in terms of facilitating development in a highly sustainable location well served by existing active travel routes. Whilst demonstrating deliverability to account for any slippages elsewhere and without relying on significant infrastructure improvements to come forward within a certain timeframe.

By virtue of the above, the inclusion of Land at Leasbrook would result in the RLDP being unsound as it would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed above, TW query the suitability of the proposed allocation at Leasbrook given its openness and the fact it would arguably set a precedent for allowing development in a location that shall encroach upon the open countryside. On that basis TW contend that in the interests of soundness Leasbrook should not be taken forward as a viable option and rather be replaced with Candidate Site CS0078- Land adjacent to Croft y Bwla.

Policy HA1- Land to the East of Abergavenny

TW do not support the proposed site allocation of land east of Abergavenny and continue to maintain a number of concerns.

Whilst there is no dispute regarding Abergavenny being identified as a Primary Settlement within Strategic S2 Policy, TW are wholly unconvinced that the Abergavenny East Strategic site is viable or deliverable; both of which are essential considerations relative to the housing delivery for the next plan period.

Welsh Government's Development Plans Manual (DPM) Edition 3 clearly emphasises the need for local planning authority's to demonstrate deliverability of all proposed allocations. Given producing evidence to show all parties have entered into an agreement is a key part of the process and in this circumstances such information is unavailable this brings into question whether the site meets the relevant criteria to be considered suitable, available and delivery in order to warrant inclusion within the RLDP.



In addition to the above, given the overall size, scale and geographic location of the site its progression is heavily dependent upon significant infrastructure improvements coming forward over the proposed plan period to be considered a sustainable location for growth. Given the complexities associated this type of development the practical difficulties can often impact the financial viability of any scheme and on occasions potentially prevent development from coming forward altogether.

TW therefore consider that the allocation of Land East of Abergavenny has major implications on the robustness of the housing trajectory and will fail to deliver the suggested 70 no. completions by 2028/29, and instead will be pushed further back in the trajectory.

This is particularly concerning given the 500 homes within the Draft LDP period, which represents approximately 23% of the overall proposed housing allocations. Given the substantial level of housing proposed to be allocated, TW note there are major technical constraints that render the proposal extremely challenging, namely the required infrastructure to support an allocation of this proposed size and location.

To evidence the major concerns, a Transport Technical Note has previously been prepared by Miles White Transport on behalf of TW, to outline both locational constraints as well as the sheer amount and cost of highways/access infrastructure required.

Firstly, Abergavenny East is located to the east of the A465 as well as the railway line, which provides significant barriers for pedestrians and cyclists to cross in order to reach the town centre and other facilities. The A465 is a busy road with high vehicle speeds and so the provision of an at-grade crossing would be difficult, particularly owing to the level differences on the western side of the A465. Moreover, the proposed settlement boundary alteration to facilitate the allocation results in an incongruous settlement pattern that is clearly detached from the Abergavenny. This is contrary to the Settlement Boundary Review which notes that the guiding principles used to provide a consistent approach to the review of the settlement boundaries, included the fact that *'Isolated or sporadic development, which is clearly detached from the settlements should, however, be excluded from the boundary'*.

Furthermore, the Technical Note confirms that the existing pedestrian network in the eastern part of Abergavenny is substandard and that it is recognised by MCC that significant improvements are required. However, what is wholly unclear is the improvements are feasible given the surrounding constraints and built up nature.

It is also evidenced that the walking distances to the town centre and other local facilities is greater than that identified in current guidance and will not conform to the 20-minute neighbourhood concept advocated in the RLDP. Given this, the site area cannot realistically be described as being accessible on foot even if the A465 and railway line can be safely crossed.

To overcome these constraints, the only solution would be providing a sustainable transport connection across the A465 and railway line. The significance of this has been stated publicly on numerous occasions and was a point of contention at the Cabinet Committee regarding the publications and consultation on the deposit Plan.

However, as evidenced in the Technical Note the estimated cost of this work is between £4.5m and £7m. As far as TW are aware, there has been no reasonable feasibility work to confirm that the infrastructure works are deliverable, without which the site should not be



taken forward. Furthermore, it is highlighted that even if such funds were available, there are numerous operational issues that will need to be resolved which have significant implications for the housing trajectory and questions are raised over the amount of deliverable dwellings within the plan period.

Moreover, the traffic impact of the proposed urban extension is unknown, and without a detailed evidence base the allocation, and any mitigation – such as the proposed strategy to provide a direct bus connection to/from the site area – remains unjustified.

Overall, the Technical Note concludes that the Abergavenny East site is poorly located from a sustainable transport perspective and will not be able to be suitably connected to the rest of the town.

On this basis, the inclusion of Abergavenny East would result in the RLDP being unsound as it would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed above, the proposed allocation will not deliver and it is not realistic or appropriate and is not founded on a robust and credible evidence base. As such, land east of Abergavenny should not be taken forward as a viable option and 500 dwellings be redistributed to other sites within Primary Settlements, in particular Monmouth and Candidate Site CS0078- Land adjacent to Croft y Bwla.

**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.

- TW have no comments on Strategic Policy S10 – Employment Sites Provision
- TW have no comments on Policy E1 – Protection of Existing Employment Land
- TW have no comments on Policy E2 – Non-Allocated Employment Sites
- TW have no comments on Strategic Policy S11 – Rural Economy
- TW have no comments on Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions
- TW have no comments on Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use





- TW have no comments on Policy RE3 – Agricultural Diversification
- TW have no comments on Policy RE4 – New Agricultural and Forestry Buildings
- TW have no comments on Policy RE5 – Intensive Livestock / Free Range Poultry Units
- TW have no comments on Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

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.

- TW have no comments on Policy EA1 – Employment Allocations
- TW have no comments on Policy EA2 – Protected Employment Sites

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.

- TW have no comments on Strategic Policy S12 – Visitor Economy



- TW have no comments on Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside
- TW have no comments on Policy T2 – Protection of existing tourism facilities

**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:

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.

TW supports in principle the objectives associated with Strategic Policy 13 - Sustainable Transport, which sets a requirement for all development proposals to accord with the Sustainable Transport Hierarchy set out within PPW12 and Llwybr Newydd: Wales' Transport Strategy 2021. The basis of which has been informed by national planning guidance and looks to place greater emphasis on development being located and designed in a way which reduces the need for people to travel and the existing reliance on private vehicles.

As demonstrated within the Transport Assessment & Active Travel Report previously prepared for Candidate Site CS0078- Land adjacent to Croft y Bwla, the site presents an opportunity for a logical continuation of existing and planned residential development immediately adjoining to the south (extant outline planning permission for 70 homes: DC/2017/0053D and current Reserved Matters: DM/2020/00189). The Candidate Site is located within a sustainable location close to a number of facilities and good transport links and demonstrates that the site is highly accessible by activity travel means.

As detailed within the extensive Active Travel Note the existing and proposed provision for Active Travel to/from the site is notably better connected when compared to other potential residential development sites in and around Monmouth. The Technical Note concludes that the Rockfield Road site is already accessible on foot and by cycle within 25 and 7.5 minutes respectively. Many local facilities (school, medical etc) are located closer than this. The Active Travel routes proposed by MCC will mean that the site is broadly within a 20 minute walk/7.5 minute cycle ride of the town centre and therefore be highly accessible.

Furthermore, Monmouth is identified as a Primary Settlement which has excellent road links and a range of frequent bus services connecting the settlement to the South Wales cities, Gloucestershire and Herefordshire. To this end, with the potential for 300 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality. Candidate Site CS0078- Land adjacent to Croft y Bwla, exemplifies



sustainable development and why further housing should be encouraged in sustainable settlements such as Monmouth.

- TW have no comments on Policy ST1- Sustainable Transport Proposals
- TW have no comments on Policy ST2 – Highway Hierarchy
- TW have no comments on Policy- ST3 Freight
- TW have no comments on Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas
- TW have no comments on Policy ST5- Transport Schemes
- TW have no comments on Policy ST6 – Protection of Redundant Routes

**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.

- TW have no comments on Strategic Policy S14- Town, Local and Neighbourhood Centres
- TW have no comments on Policy RC1 – Central Shopping and Commercial Areas
- TW have no comments on Policy RC2 – Primary Shopping Frontages
- TW have no comments on Policy RC3 – Local Centres and Neighbourhood Centres/Shops
- TW have no comments on Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

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

Support:



Is your representation in support or objection?	Objection:	
<i>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).</i> <i>If you are objecting, please state how you would like the Plan to be changed.</i> • TW have no comments on Strategic Policy S15 – Community and Recreation Facilities • TW have no comments on Policy CI1 – Retention of Existing Community Facilities • TW have no comments on Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas • TW have no comments on Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing • TW have no comments on Policy CI4 – Areas of Amenity Importance		

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:	
<i>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).</i> <i>If you are objecting, please state how you would like the Plan to be changed.</i> TW understand the requirement of Strategic Policy S16 – Sustainable Minerals Management to Safeguarding known/potential land won sand and gravel, sandstone and limestone resources for future possible use. However as detailed in response to Policy M2 below, TW question the appropriateness of the safeguarding areas as identified on the Proposals Map, in particular the area covered by Candidate Site CS0078, which due to its proximity to the settlement boundary and other committed and allocated development would never be extracted. TW raise objection to the inclusion of Candidate Site CS0078 within the Minerals Safeguarding Areas as identified on the Proposals Map and Policy M2.		



Given that Candidate Site CS0078 is immediately adjoining the proposed settlement boundary for Monmouth, then it is considered that the resource is constrained by sensitive development and extraction would have an unacceptable impact on the environmental and have significant amenity considerations. It is considered that any extraction would be unfavourable due to its location.

Furthermore, it is considered that the development of Candidate Site CS0078 would not have significant impact on quantity of the mineral safeguarding throughout the whole Country.

Given the above the presence of the mineral resource does not preclude the allocation and development of the site.

- TW have no comments on Policy M1 – Local Building and Walling Stone.
- TW have no comments on Policy M3 – Mineral Site Buffer Zones
- TW have no comments on Strategic Policy S17 – Sustainable Waste Management
- TW have no comments on Policy W1 – Waste Management Facilities
- TW have no comments on Policy W2 – Agricultural Land – Disposal of Inert Waste
- TW have no comments on Policy W3 – Identified Potential Waste Management Sites

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.

TW are aware from the Candidate Site Assessment Report 2024 that Candidate Site (CS0078), Land adjacent to Croft-Y-Bwla is 'not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need'.

That said, TW also highlight that out of the candidate sites, save for those allocated, the site performed the best in terms of having no technical comments stopping its allocation. In this regard, TW have outlined in Question 10 their significant concerns regarding Policy HA4 – Land at Leasbrook, Monmouth; and ii) Policy HA1 – Land East of Abergavenny, and subsequently how they are not considered to be 'sufficient and more suitable land' and that the numbers should be redistributed to more appropriate sites.





Therefore, TW continue to promote Candidate Site CS0078 as an opportunity for a logical continuation of existing and planned residential development in Monmouth. The Candidate Site is located within a sustainable location close to a number of facilities and good transport links. This is evidenced in the accompanying Preliminary Transport Strategy which contains an Active Travel Note (Appendix F) and demonstrates that the site is highly accessible by activity travel means. As evidence within the Transport Strategy this includes the fact Croft-Y-Bwla is well served by a series of existing footpaths and cycle ways which provides direct connectivity to facilities within Monmouth town centre. Upon further review the routes are naturally more attractive when compared to those associated with Land at Leasbrook and Last East of Abergavenny which shall incentive their use by future residents rather than private vehicles. The principles fully accord with the objective of PPW12 and MCC's ambitions to achieve a more sustainable pattern of development.

TW are aware planning permission has been granted to candidate sites to the south and so it is reasonable to assume the site to the south is being pursued by developers and so will come forward in the short term. This, as such, aids the deliverability of the candidate site, Land adjacent to Croft-Y-Bwla, which would consist of 'Phase 3' of the existing and planned residential development in this area.

As detailed above, Monmouth is identified as a Primary Settlement which has excellent road links and a range of frequent bus services connecting the settlement to the South Wales cities, Gloucestershire and Herefordshire. To this end, with the potential for 300 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality. This Candidate Site, as such, exemplifies why housing should be encouraged in sustainable settlements such as Monmouth.

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



in light of the evidence)?

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):

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.

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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.

1506

Morspan Pension Scheme

Date: 11th December 2024
Our Ref: 21.205

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Monmouthshire County Council
Planning Policy
County Hall
The Rhadyr
Usk
NP15 1GA



Dear Sir/Madam,

Monmouthshire Replacement Local Development Plan 2018-2033
Deposit Plan Consultation
Former Poultry Units Site, Rockfield Road, Monmouth

I write in relation to the current consultation on the Monmouthshire Replacement LDP Deposit Plan (October, 2024), specifically in regard to the Former Poultry Units Site, Rockfield Road, Monmouth.

Further to the promotion of the above site (Candidate Site Ref. CS0272) on behalf of the Site Promoter (Morspan Pension Scheme), the inclusion of the land comprising the Former Poultry Units site as an employment allocation in the Deposit Plan is welcomed and supported.

Further to the extensive representations submitted by Asbri Planning in regard to the site over the course of the preparation of the Replacement LDP to date, we wish to submit of representation of support in relation to the following Deposit Plan policies:

- Strategic Policy S10 – Employment Sites Provision
- Policy EA1 – Employment Allocations (specifically Site Ref. EA1b and the associated allocation as identified on the Deposit Plan Proposals Map)

Strategic Policy S10 – Employment Sites Provision

As identified at previous stages of RLDP consultation (including the Growth and Spatial Options consultation and the Preferred Strategy), a key element of the RLDP strategy relates to the promotion of a growth level/spatial strategy that will promote higher employment growth, support greater labour force retention, and achieve a reduction in the net out-flow of workers. As such, the RLDP looks to enable the provision of up to 6,240 jobs over the Plan period (416 jobs per annum). The allocation of deliverable employment land will form a fundamental part of securing the level of local economic growth proposed. Strategic Policy S10 (Employment Sites Provision) is therefore supported, with the provision of 57ha of employment land considered appropriate if the proposed levels of economic growth are to be achieved.

Policy EA1 – Employment Allocations

It has been clearly demonstrated through the extensive submissions made in relation to Candidate Site Ref. CS0272 (including the significant supporting survey and assessment work), that the Former Poultry Units Site represents a deliverable and viable employment allocation, which can support the Local Authority in achieving the required level of employment growth over the Replacement Plan period. In summary:

- The Former Poultry Units site comprises brownfield / previously developed land in a highly sustainable location on the edge of the existing settlement of Monmouth (within circa 400m of the Town Centre, adjacent to Active Travel Routes, and within 30m of bus stop) – allowing for “co-location” of homes and employment and the potential for significant commuter journeys to be made by walking/cycling or public transport.
- It has been demonstrated that the allocation is viable, as identified within the submitted viability evidence which highlights that site can provide high quality employment space in a town that has lacked such provision for a significant period of time. The submitted Viability Statements have previously highlighted that it is clear that the current trend in office space requirements is away from big cities to locations closer to where staff live – the site is positioned within 400m of the centre of the existing settlement of Monmouth, which is home to a substantial proportion of the County’s population, allowing for the convenient positioning of jobs close to home.
- The employment allocation will assist the Authority in delivering a range of employment sites over the replacement plan period, and allow for evidenced demand within the north of the County (and specifically Monmouth) for purpose-built office space to be met.

The allocation of 1.3ha of land for B1 use Former Poultry Units Site as designated under Policy EA1b is therefore supported. Furthermore, we would reiterate the Site Promoter’s commitment to delivering the sustainable, high-quality employment allocation on the former Poultry Units site, in accordance with the phasing trajectory outlined at Appendix 10 of the Deposit Plan. It is confirmed that the site can be delivered in the medium term (between 2023/24 and 2027/28) as identified on the employment land trajectory.

Flexibility of Uses

It is acknowledged that in accordance with the Use Classes Order, the B1 allocation at the Poultry Units site allows for ‘light industrial’ use in addition to office space, and it is the case that the supporting survey work (including Transport Statement) has demonstrated the suitability of the site for light industrial (in addition to the provision of offices specifically).

It is noted that the ‘industrial and business sites’ designations within the RLDP do not allow for uses outside the B1 Use Class to be included within the allocation. However, we would highlight that at earlier stages of the Candidate Sites process, it has been identified that the site could support an element of D1 use (with a deliverable and viable site layout prepared which incorporates D1 provision). The Site Promoter would maintain that a wider / more flexible designation (which allows for a mix of B1 and D1 uses) remains viable, and would present a preferable option in terms of making the most efficient use of this sustainable/brownfield site (whilst also delivering employment generation). It is reiterated however, that the B1 scheme remains viable (without D1).

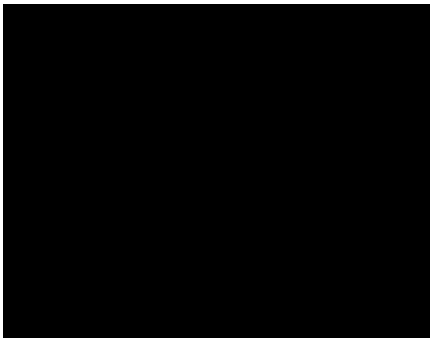
Conclusion

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to Candidate Site Ref. CS0272 since approximately 2020 onwards, the inclusion of the Former Poultry Units site as employment allocation fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness.

As stated, further to our ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering a sustainable, high-quality employment allocation on the former Poultry Units site in accordance with the policies of the Replacement plan (both site-specific and plan-wide policies inclusive).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions in relation to Strategic Policy S10 (Employment Sites Provision) and Policy EA1 (Employment Allocations) specifically.

Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.





**Office
Use Only**
Represent
tor
Number

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

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 Rhadyr, 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)	Morspan Pension Scheme	Asbri Planning
Address:	c/o Agent	
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:

x

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.

Please refer to attached Cover Letter (Asbri Planning 11.12.24) for full details of representation.

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

Support:



monmouthshire
sir fynwy



Is your representation in support or 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. N/A		

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. N/A		



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.

N/A





**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.

N/A

**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.

N/A

**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.

N/A



**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.

N/A

**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.

N/A

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

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.

N/A



**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:

X

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.

Please refer to attached Cover Letter (Asbri Planning 11.12.24) for full details of representation.

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

Is your representation in support or objection?

Support:

X

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.

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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:

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.

N/A



**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.

N/A

**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.

N/A

**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.

N/A





**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.

N/A

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).

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Do you consider that the Plan is sound?	Yes:	X
	No:	
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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)? ☐	
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(is the Plan appropriate for the area
in light of the evidence)?

(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):

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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:	
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Part 5: Welsh Language

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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?



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

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- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
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- 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/>
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General Data Protection Regulation (GDPR)

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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.

3480

Mr & Mrs Williams



**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 Rhadyr, 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:	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.		



Please see attached letter/statement

**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.





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**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:	X
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): See attached letter/statement		



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:	X
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?
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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?
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New or Amended Sites

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

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AH/240138/L0001

By portal

16 December 2024

Development Plans Team
Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP15 1GA

Dear Sir/Madam

Representations to the Monmouthshire Replacement Local Development Plan 2018-2033
Deposit Draft

I write on behalf of [REDACTED] in **objection** to the proposed allocation of land to the east of Burrium Gate for 40 residential dwellings under draft Policy HA11 of the Replacement Local Development Plan.

[REDACTED] had previously objected to the promotion of this site for housing as part of the formulation of the previous (now current) LDP, in January 2012. At that time, however, their representations were made in support of the officer view that this site was entirely unsuitable for housing development, and the site was not allocated for development.

The proposed allocation of this site for housing in Policy HA11 of the Replacement Local Development Plan therefore came as a surprise to [REDACTED] who had the reasonable expectation that absent any material change in circumstances in respect of the essential qualities of the site, it would remain to be considered an inappropriate site for housing.

The 2011 rejection of the site for housing by officers was based on a thorough assessment of its qualities. The 2011 *Report of Consultation on Proposed Rural Housing Allocations (Including Candidate Site Analysis) June 2011* stated that in respect of this site (Then identified as site CS/0033):

"These sites [CS/0333 and the neighbouring site CS/0063] should be taken into consideration together due to their location; CS/0063 is situated between the two parcels of land related to CS/0033. There would be difficulty in obtaining sufficient vehicular access to these sites. There are also biodiversity concerns as there are European species issues to be considered at the site,

the western portion of CS/0033 has also recently been designated as a SINC. In terms of landscape the Landscape Sensitivity and Capacity Study identifies the sites as being within an area of high/medium sensitivity and low capacity for residential development. The development of these sites would represent a significant greenfield expansion that would have adverse landscape impacts, particularly as significant development has been recently built in close proximity."

Against this backdrop it is perplexing that [REDACTED] that officers at this current review have concluded that:

"The site performs well against the assessment methodology with no fundamental constraints identified. A landscape concern has been raised but it is considered that this can be mitigated providing development is maintained within a ridgeline no more than 40m above Ordnance Datum (AOD)" (our underlining).

The objectors consider that the proposed allocation of the site under draft Policy HA11, based on this assessment, is fundamentally flawed, for a number of reasons.

Dealing first with landscape impacts, the Council's Landscape Sensitivity Study prepared by White Consultants in October 2021 revisited the landscape sensitivity of this specific site and identified it as being of High/moderate sensitivity, noting:

"The susceptibility of the site is that it is part of an area that performs an important role for Usk in providing an unspoilt rural backcloth of steep hills and valleys sides of woods and pasture. It is highly prominent from the Monmouth Road with its steep sloping pasture contributing to the rural backcloth and providing a logical stop to the settlement which is set down on lower gentler slopes in a former field to the west. The value of the site lies in its contribution to the scenic value of the mixed wood and pasture hillside."

The assessment determined that the site was located within a cultural landscape of "Outstanding" value. It also noted that the site or its attributes contribute to the Wellbeing and Future Generation Act goals of a resilient Wales.

This status warrants more than mere "concern" in respect of landscape impact. The proposal has the potential to result in landscape impacts that patently run contrary to the Well-being Goals of Welsh Government.

The proposed mitigation of the landscape impact is to keep the ridgelines of new dwellings below 40m AOD. However, as the plan below shows, the site is steeply sloping from south to north and reaches 40m ground level halfway up the site.

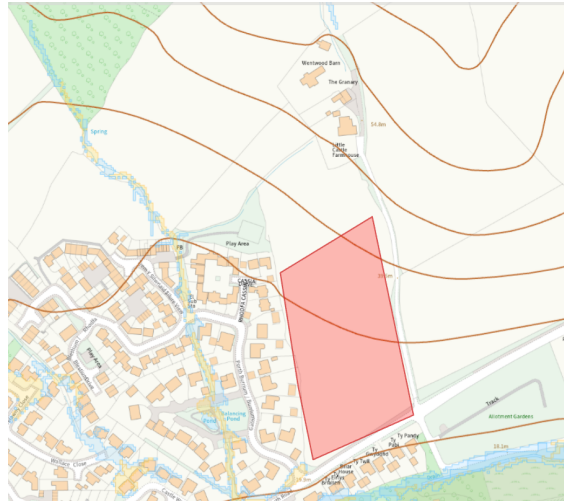


Figure 1: Local site topography (10m isochrones)

Even to achieve a 40m ground level across the site would require a groundworks exercise of unfathomable proportions. However, to achieve a ridge line of 40m AOD would require ground levels to be reduced by 5-6 metres at the southern end and 7-8 metres at the northern end. That is simply not feasible. Moreover, it does not square with the expectation of the draft Policy HA11 that the development should “*respond to its topography*”. The policy is internally inconsistent.

Setting aside the quite obvious impact of such levels on viability of such abnormal groundworks costs (a viability which is already likely to be marginal given the 50% affordable homes requirement and the significant package of Section 106 obligations listed in the supporting text to draft Policy HA11 to be supported by only 20 market houses), these levels could not be achieved without significant changes to the relationships with existing properties and infrastructure, as well as the removal of trees and hedges. This also raises concerns about the impact on adjoining designated SINC areas.

The reality is therefore that residential development of this site, even allowing for some localised regrading, would sit at least 4-5m above existing ground levels, elevated above the adjoining properties and with a significant impact on the immediate landscape and the wider landscape of the nearby AONB, a poor fit with Welsh Government policy both in PPW Chapter 6 and the Well-being Goals.

The regrading of the site is of significant concern to [REDACTED]. Their existing property already experiences periodic surface water flooding from the higher adjoining land. Any changes to the topography of that site, and the introduction of impermeable surfaces through buildings and driveways, has the real potential to make this much worse, to the detriment of the amenity and safety of existing residents.

In ecology terms also, the site is recognised as accommodating European Protected Species in the 2011 report. The objectors have personal experience of sighting badgers and bats, as well as dormice and newts. These are protected species and without detailed survey work, allocation of this site would be inconsistent with the Habitats Directive. It is not clear whether a HRA has been undertaken in this case.

Of particular concern is that access to this site would need to be taken from Monmouth Road, which will necessitate the removal of some substantial mature hedgerows and trees, entirely contrary to the objectives of PPW Chapter 6.

Finally, the site does not offer reasonable access, either by car or by non car modes. It will rely on a single point of highway access onto a busy road for all modalities, with no or limited interrelationship with the adjoining residential areas. The site therefore offers no opportunities for active travel and will effectively function as a car-dependent enclave, contrary to the sustainability and net zero objectives of PPW and Future Wales 2040. This is of particular concern given the designation of an Air Quality Management Area in Usk, where vehicular traffic should be reduced, not increased.

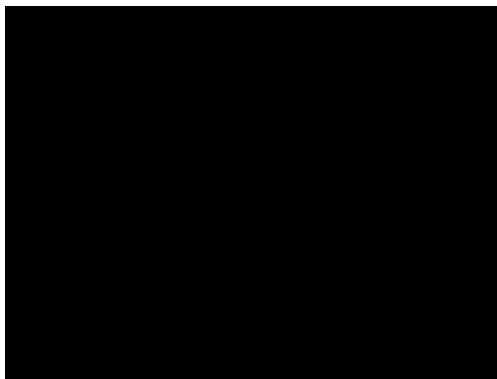
In the context of the above, [REDACTED] consider that the proposed allocation of this site is unsound, insofar as it appears not to have met the requirements of the Habitats Directive and is directly in conflict with PPW (particularly Chapter 6), Future Wales 2040 and Well-being Goals.

The rationale for its allocation and the mitigation of impacts by unrealistic expectations of site levels and viability is unsupported by any evidence. Indeed, it runs counter to the Council's own unequivocal assessment in 2011 that the site is unsuitable for housing.

The proposed allocation of this steeply sloping hillside for a 50% affordable homes scheme is patently lacking in robustness. It is therefore also an inappropriate allocation.

Finally, for the reasons outlined we do not consider that this allocation could be implemented in the manner outlined, thereby failing to deliver homes that could be met on other more suitable sites elsewhere in the County Borough.

We trust that you will take full account of these representations in the review of the LDP.



3737

Mr Andrew Hazell

Archived: 11 March 2025 08:42:30

From: [REDACTED]

Mail received time: Mon, 16 Dec 2024 15:06:27

Sent: Mon, 16 Dec 2024 15:04:36

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: Representations to Monmouthshire Deposit LDP

Importance: Normal

Sensitivity: None

Attachments:

[Representations combined.pdf](#) 

Please find attached representations in respect of the Deposit LDP.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

.....

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.....

.....

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:

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

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, 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**
Represent
tor
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:	
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. 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:

X

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.

The representor supports the allocation of new sites for employment uses in Policy EA1 but considers that land east of the A4810 and north of the B4245 at Magor should be included as an appropriate location to provide complementary small scale employment and appropriate ancillary uses to the existing employment area of Wales One. (See attached letter).

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:	X
	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):		



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:	X
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:

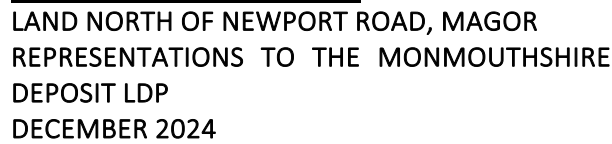
- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of 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.



In the context outlined above, this brownfield site presents an opportunity for redevelopment to accommodate employment type uses or uses that may be complementary to the allocated area to the west, supporting the employment objectives of the LDP and Future Wales. It therefore ought to be allocated in the emerging LDP for such purposes.

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LAND AT NEWPORT ROAD, MAGOR, MONMOUTHSHIRE, NP26 3EH



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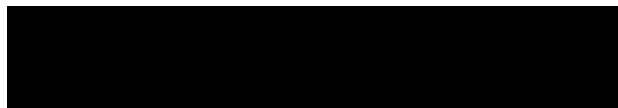
 Subject site

0m 20m 40m 60m 80m 100m

Scale: 1:1250

Paper Size: A4

Notes:



3824

Sentiem

Archived: 12 March 2025 18:49:27

From: [MCC - Planning](#)

Sent: Mon, 16 Dec 2024 11:20:16

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

Subject: FW: Monmouthshire Replacement Local Development Plan (RLDP) Consultation 2024 - Representation on behalf of Sentiem

Importance: Normal

Sensitivity: None

FYI

From: [REDACTED]

Sent: 16 December 2024 11:19

To: MCC - Planning <Planning@monmouthshire.gov.uk>

Cc: [REDACTED]

Subject: Monmouthshire Replacement Local Development Plan (RLDP) Consultation 2024 - Representation on behalf of Sentiem

Good morning,

On behalf of Sentiem, please find our response to the Monmouthshire Replacement Local Development Plan (RLDP) Consultation.

We have reviewed the sections of the document relevant to Abbey Hotel site and have provided our comments accordingly. However, we have not yet reviewed the remaining portions of the document and, therefore, cannot provide answers to questions in relation to those sections at this time.

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

We recognise that tourism plays a significant part in the Monmouthshire economy, and the development proposals at the Abbey Hotel will contribute to the sustaining the County's historic town centres by bringing back into use a key site which has been closed for 14 years and had been considered lost for housing.

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

No.

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

No.

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

No.

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

No.

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

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)

No.

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

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)

No.

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

No.

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

Deposit S10 notes that development proposals within settlement boundaries that seek to deliver the Council's vision for sustainable economic growth will be permitted, particularly where they reflect the aims of the Economy, Employment & Skills Strategy.

Any forthcoming proposals to redevelop the Abbey Hotel reflect the aims mentioned above. In terms of 'Place', any proposals would promote the distinctive diversity of Monmouthshire as a county of opportunity, whilst supporting the vitality of Tintern. Redeveloping the Hotel given its dangerous state of repair and bringing it back into use would enhance the experience for visitors and deliver sustainable growth in the tourism economy. In terms of 'People' and 'Enterprise', redevelopment would support job opportunities and career prospects within the tourism sector, as well as contributing to the sustainable growth of existing businesses. In terms of 'Infrastructure', the proposed development contributes to a well-connected Monmouthshire by attracting investment.

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

No.

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

Yes.

Deposit Policy S12 relates to the visitor economy, and focuses on supporting and promoting sustainable tourism development within Monmouthshire.

Paragraphs 18.1.3-18.1.4 recognises that tourism plays a significant part in the Monmouthshire economy, particularly the rural economy. We strongly support the Council's view that the RLDP needs to safeguard, provide and enhance the visitor economy/tourism facilities as this is essential in ensuring that Monmouthshire realises its potential as a high quality and competitive visitor destination.

Deposit Policy T2 seeks to retain a variety of tourism facilities to ensure there is a wide range and choice of facilities in Monmouthshire. We fully support the protection of existing tourism facilities, and believe that the loss of the Abbey Hotel as a tourism offering would adversely affect the range and quality of tourism facilities available within the locality and Monmouthshire as a whole. The existing Hotel building needs to be replaced with a sympathetic well-designed scheme to provide a platform for decades of important hospitality and tourism investment.

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

No

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

No

Do you have any comments on the community infrastructure and open space policies? (Policies S15, C11, C12, C13 & C14)

No

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

No

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

No

Soundness

Do you consider that the Plan is sound?

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)?

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

N/A

Please can you confirm that you are able to accept these comments. If you have any queries or questions, please let us know.

Kind regards,
Alice



Savills, 2 Kingsway, Cardiff, CF10 3FD

Tel:

Mobile:

Email:

Website: [savills.co.uk](https://www.savills.co.uk)



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