



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit
Representations Register

Volume 21 - Other Stakeholders



monmouthshire
sir fynwy

1123	MCC Cleansing and Waste Team
3118	Councillor Meirion Howells - Surveys Little Mill & Usk
3562	Gateway to Wales Action Group
3617	Chepstow Town Juniors FC
3622	Wedgwood Park Residents Management Company Limited
3704	Age-Friendly Monmouthshire
3859	Swifts Local Network: Swifts & Planning Group

1123

MCC Cleansing and Waste Team

Feedback on RLDP from cleansing team primarily related to litter

Our concerns are for the following in general terms

1. Control of litter from drive through outlets, which too often ends up as roadside litter which is unsightly, an environmental risk and costly to remove. If there were a way of preventing customers from leaving premises without first disposing of their litter in a suitable bin on the premises that would be preferable. The businesses providing these outlets should be held more responsible for the resulting litter and planning conditions could be applied to ensure that fast food litter does not blight the immediate area and further afield. We would ask for consideration of a planning guidance note related to fast food and hot food takeaways, examples of these from other local authorities are provided at the end of this submission.
2. Provision of adequate litter bins associated with new developments to prevent on street littering. Location of bins, or contributions to providing litter bins off-site should be discussed with Grounds and Cleansing department to make sure that the right bin is in the right place.
3. Provision of adequate storage capacity to enable residents and businesses to manage their waste and recycling effectively. With increasing separation of recyclables at the kerbside into different streams, there is a need for adequate storage within households and businesses. There is a particular challenge for flats, communal dwellings and above shop flats in town centres, where suitable external collection points may be necessary to prevent a negative impact on heritage towns and streets.

The following are comments related to specific RLDP policies

- Space in properties to enable recyclable materials to be separated and adequately stored, or if there is insufficient space inside new properties to ensure that adequate storage is provided outside that minimises potential for animals and birds to scatter it, or for it to create a litter problem to surrounding residents and the wider environment. Particular regard should be had for preventing litter entering waterways which can transport waste to the sea, and block drains causing flooding issues.
- “A vibrant, greener Monmouthshire, including a focus on supporting the vitality of the County’s town centres, supporting rural diversification and the transition to net zero and improving the visitor experience to deliver sustainable growth in the hospitality sector.” Measures should be included to ensure that growth and vitality does not increase litter, which should be well managed and responsibility taken by businesses that contribute to litter. Discussions should be had with grounds team when placing litter bins, as we are increasingly providing separated recycling litter bins, or a contribution made by developers to provide or replace litter bins in towns and villages.
- “People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero carbon county.” Controlling development of fast food outlets to areas that are not in close proximity to schools and colleges will help with this part of the RLDP vision. Drive throughs and fast food takeaways without seating provided to enjoy a meal in situ make a particularly large contribution to litter in surrounding areas and recognition is needed of this fact, and

mitigation, and improved control over their impacts. When new bus stops and public transport infrastructure are provided consideration should be given to providing strategically placed litter bins, in consultation with MCC grounds and cleansing.

- “Policy PM1: ensure a safe, secure, pleasant and accessible environment for all members of the community supporting the principles of community safety and maximising opportunities for connectivity to the wider environment;” This should also include an environment where development does not contribute to litter and a degraded environment due to poor waste management.
- “Policy PM2: Development proposals that would cause or result in a significant risk/harm to local amenity, health, the character/quality of the countryside or interests of nature conservation, landscape or built heritage importance, due to the following, will not be permitted unless it can be demonstrated that measures can be taken to overcome any significant risk:” Is it possible to add waste and litter to the list of risks resulting from development, so that potential developers are aware of the need to take these seriously?
- “Strategic Policy S4 - Climate Change All development proposals will be required to address the causes of, and adapt to the impacts of, climate change. Means of achieving this will include:
 - i) Avoiding locating development in areas at risk of flooding, or where appropriate, minimising the risk of flooding including the incorporation of measures such as Sustainable Drainage Systems (SuDs) and flood resilient design;
 - ii) Incorporating low/zero carbon energy requirements by reducing energy demand and promoting energy efficiency through the design of buildings by prioritising fabric first and orientation design principles;
 - iii) Supporting the development of renewable and low/zero carbon energy generation and storage and a presumption against energy generation utilising fossil fuels, fracking and methods that are not low/zero carbon;
 - iv) Utilising sustainable construction techniques and local supplies through the adoption of the circular economy principles, where possible;
 - v) Incorporating water efficiency measures and minimising adverse impacts on water resources and quality;
 - vi) Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel;
 - vii) Providing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality; and
 - viii) Supporting the resilience of development through green infrastructure solutions, including opportunities for biodiversity and resilient ecosystems, greenspace provision and connectivity, and water resource management.
- This section should also include enabling recycling at home and by businesses as this is an important contribution that residents and businesses can make to reducing CO₂ emissions and using the planet’s resources efficiently. This includes ensuring that there is adequate storage facility in residential and commercial developments, and adequate infrastructure in the form of waste transfer stations where recyclable materials can be stored as separate waste streams. Enabling more local recycling of materials is also important in developing a more localised circular economy.

- Policy S6 Infrastructure: “New development will therefore be required to provide or contribute towards the provision of necessary infrastructure to enable it to be provided in a timely manner and to support sustainable development in Monmouthshire.” Might this include litter bins and waste management away from the home?
- Strategic Policy S17 Sustainable Waste Management: includes “v) Ensure that provision is made for the sustainable management, sorting, storage and collection of waste in all new development.” I’d suggest this section may need updating following the introduction of the new business waste regs in April 2024 which require all workplaces to separate their recycling.
- “23.1.7 It is also important that new developments facilitate sustainable waste management options for the people living in and using new developments once complete. This Policy aims to encourage the recycling of waste materials by the provision of adequate facilities for the storage and collection of waste and separation at source. Waste related considerations should be taken into account in the design of the development so that they are properly integrated into it, and fully accessible to collection vehicles.” This should also be a consideration for conversions to residential – eg flats above shops where residents have limited space for storing materials and there is limited street space for storing materials. Discrete on-street storage facilities should be considered in some locations to avoid a negative impact on often heritage streets in Monmouthshire towns.

Consider a Guidance note for Fast Food and Hot Food takeaways, which covers a range of issues including combatting obesity by not siting fast food takeaway outlets within proximity to schools/educational establishments as well as effective management of litter. Litter would not be such a problem if fast food outlets provided only seated areas for food to be eaten on the premises, rather than allowing drivers to leave and eat their food elsewhere (eg in the vehicle), where there are no facilities for disposing of waste and litter becomes a greater problem. See below links to relevant guidance notes/SPG from four Welsh authorities Denbighshire and Wrexham, Blaenau Gwent and Bridgend, and guidance on using the planning system to control hot food takeaways from a health perspective.

Wrexham: <https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-9e.pdf>

Denbighshire: <https://www.denbighshire.gov.uk/en/documents/planning-and-building-regulations/ldp/supplementary-planning-guidance/adopted-spg-documents/hot-food-takeaways.pdf>

Blaenau Gwent Hot food and drink SPG: <https://www.blaenau-gwent.gov.uk/media/tab0crb/hotfoodanddrink.pdf>

Bridgend Hot Food takeaways SPG: https://www.bridgend.gov.uk/media/1848/spg_14_-_hot_food_takeaway_establishments.pdf

Planning for Health, London Healthy Urban Development Unit – using the planning system to control hot food takeaways: <https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Control-of-Hot-Food-Takeaways-Feb-2013-Final.pdf>

Archived: 07 March 2025 16:55:08

From: [REDACTED]

Sent: 16 December 2024 15:00:32

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: Response to RLDP from Cleansing team

Importance: Normal

Sensitivity: None

Attachments:

[Feedback on RLDP.docx](#);

Dear Planning Policy,

I have attached a response from the cleansing team focussed primarily on litter prevention and management in relation to land use planning. At the consultation meeting for Community Climate Champions I asked [REDACTED] if a SPG or Planning Guidance note could be considered for hot food takeaway proposals, and promised to find examples of this from other areas. These are included at the end of the attached paper.

I hope this is helpful.

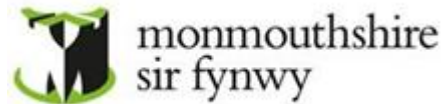
Best wishes

[REDACTED]
Swyddog Addysg ac Ymwybyddiaeth Isadeiledd Gwyrdd a Sbwriel
Green Infrastructure and Litter Education and Awareness Officer
Tel: 07826 914981

Waste & Street Services / Gwasanaethau Wastraff a Strydoedd
Monmouthshire County Council / Cyngor Sir Fynwy
Tel / Ffôn: 01633 64 (4525)

Website / Gwefan: www.monmouthshire.gov.uk/recycling-and-waste

Follow us on Twitter / Dilynwch ni ar Twitter: www.twitter.com/MonCCRecycling



3118

**Cllr Meirion Howells - Surveys Little
Mill & Usk**

Archived: 13 March 2025 14:49:11

From: [REDACTED]

Sent: Mon, 16 Dec 2024 21:03:03

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: RLDP Consultation Llanbadoc & Usk Ward

Importance: Normal

Sensitivity: None

Attachments:

[REDACTED] [sk Survey Outcomes.pdf](#); [Little Mill Survey Outcomes.pdf](#);

Dear Planning Policy

Please find attached my completed RLDP consultation form. I had attempted to complete this by using the online form, however, the online form only allows for 'support' or 'objection' answers and the comments to section 10 for me are 'mixed' as this covers 3 separate developments in my ward, please advise if there is an option for this?

I also attach the outcomes and comments of the surveys that I conducted in my Llanbadoc & Usk Ward, one for the site in Usk and one the sites in Little Mill which I would like to be submitted as part of the consultation. I hope this is in order.

Nadolig Llawn / Merry Christmas & Best Wishes

[REDACTED]
Monmouthshire County Councillor – Llanbadoc and Usk Ward
Cynghorydd Sir Fynwy – Ward Llanbadog a Brynbuga
[REDACTED] [@monmouthshire.gov.uk](mailto:[REDACTED]@monmouthshire.gov.uk)
07958 300811



Website / Gwefan: www.monmouthshire.gov.uk

Follow us on Twitter / Dilynwch ni ar Twitter: www.twitter.com/monmouthshirecc

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

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.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		
Job Title:(where relevant)		
Organisation: (where relevant)	Monmouthshire	
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:

Yes

Objection:

Monmouthshire has the highest average house prices in Wales at £400,00.

The RLDP gives an opportunity to increase the amount of affordable homes that will address the housing need for those who are unable to afford to live in Monmouthshire or are staying in shared housing.

We have 2,064 households in need of affordable homes.

In Monmouthshire the over 65 year old population has increased by 26% in the past 10 years, this changes the type of services the LA has to provide and also reduces the financial support to local businesses. It follows that our younger demographic is reducing. Increasing affordable housing allows us to retain a larger number of younger people to contribute to our economy and workforce.

The RLDP addresses climate change by providing net zero carbon homes to help reduce carbon emissions and are located within 15 mins walking distances of town centres.

Natural Resources Wales are adopting tighter targets for river water quality and have put in place a requirement to achieve phosphate neutrality or betterment in the River Usk and River Wye. In Usk, Welsh Water have invested £10 million in upgrading the Usk Water Treatment System that will see an increase in capacity.

Unemployment levels are low; however for those working in the area earnings are lower and employment is relatively less skilled. More commute out of county than those that commute in, affordable housing will help address this.





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:

Yes

Objection:

New developments must protect the best and most versatile agricultural land, however I accept there is very limited opportunities for brownfield developments in Monmouthshire.

Developments need to increase opportunities for the younger population to both live and work within Monmouthshire to create a more balanced demography for social and economic sustainable communities.

Developments need to provide affordable housing with exemplar, mixed, sustainable and well-connected homes for both the existing and future residents.

New developments must take account of the risk of flooding, existing and in the future and the impact the development could have on other areas.

Developments must ensure that appropriate physical and digital infrastructure including community and recreational facilities, education, sewerage, water, transport, health care and broadband are in place or can be provided to accommodate a new development.

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:

Yes

I am unsure if there is a necessity for two sites in Little Mill. HA16 land north of Little Mill is a 15 home site has had recent planning consent for work to proceed. HA15 land east of Little Mill is providing a further 20 home development in the deposit plan, this is a total of 35 houses in a small village. Nearby on the fringes of Little Mill is a proposal for a large 800 home development in Mamhilad, Torfaen with a new school. Residents tell me the extra 20 homes in Little Mill are not required.



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

Is your representation in support or objection?

Support:

Yes

Objection:

There is very little opportunity to develop on brownfield sites in Monmouthshire. There is no alternative to develop on open countryside if the choice is to provide houses for residents however these can be developed close to existing settlements.

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:

Yes

Objection:

I support this policy and its intent to protect and enhance the quality of Monmouthshire's settlements and countryside. Ensuring that new development is designed to a high standard that creates buildings and places that are sustainable, well-integrated and contribute to the economic, social, environmental and cultural well-being of strong, vibrant and healthy communities.

There are no alternative sites in Usk, creating the right development in the right place is essential. Proposals must take into account any unacceptable risk or harm due to air, light, noise or water pollution or contamination. Bridge St, in Usk is an Air Quality Management Area however there has been a progressive decrease in levels of air pollution, so much so that monitoring will be revoked next April 2025 as nitrogen dioxide levels have, in all areas monitored, been below Welsh Government guidelines for the past 7 years. Any new development would be required to show no reverse of this air quality improvement.





**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:

Yes

Objection:

S4.

Monmouthshire County Council declared a climate emergency in May 2019

It is important that all developments must combat the effects of climate change as a priority when considering the sustainable impact of the development.

I support that all construction will be net zero with low or zero energy production and storage.

I support that Natural Resources Wales are adopting tighter targets for water quality.

I support that developments must incorporate sustainable drainage systems

I support the development of green infrastructure solutions, including opportunities for biodiversity and resilient ecosystems, greenspace provision and connectivity, and water resource management.

NZ1

I support this net zero homes policy. Homes should seek to balance its essential operational running costs from renewable energy sources and ensure the building fabric is to the highest performance rate A standard.

I support that new homes must not be connected to the gas grid and that energy use should be met by low carbon systems.

Flood Risk

I support that this policy seeks to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas of flood risk and to ensure that new development does not increase the risk of flooding elsewhere.

I support the use of sustainable drainage systems which must be an integral part of a development to ensure consideration is given to surface water drainage discharges, water quality, amenity and biodiversity enhancements

I support the requirement to ensure that drainage proposals for all new development over 100 m² of construction area, where there are drainage implications are fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage and that TAN 15 notes that SuDS manage rainfall in a similar way to natural processes, making use of the landscape and vegetation to control the flow and volume of surface water.



**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:

Yes

Objection:

Net Benefit for Biodiversity

I support that this Council places a duty to maintain and enhance biodiversity by ensuring developments do not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

G12 Trees, Woodland & Hedgerows.

I support that where trees, woodland and hedgerows are present, development will only be permitted where they are informed by appropriate surveys, assessment and plans to identify and inform biodiversity, GI and landscape value, methods for retention, integration, protective mitigation and long-term protection through maintenance and management. If removal and/or damage is necessary, a scheme for their replacement must be agreed as part of the development proposal design.

Dark skies and lighting

I support that for proposals which might result in artificial lighting of habitat, important for bats or other biodiversity, will need to be accompanied by sufficient information to enable a full assessment of the proposal to be undertaken.

Policy NR1 – Nature Recovery and Geodiversity

I support that for proposals which may have an adverse effect on locally designated sites, protected or priority species and habitats, must be accompanied by sufficient information to enable a full assessment of the proposal to be undertaken

Phosphate Water Quality

I support that any proposed development that increases the volume of concentration of wastewater and is within the catchment areas of the River Usk and River Wye will need to evidence within a planning application that the development proposal is in accordance with the latest NRW guidance

Surface Water

I support that surface water should not connect to the public sewerage system and that the Council is committed to implementing a sustainable approach to surface water drainage and expects development to incorporate Sustainable Drainage Systems.

Usk has experienced flooding in areas due to unpredictable heavy rainfall.

Flooding issues that occur in Usk are generally due to the flood defences implemented in the 1970s. These flood defences protect Usk Town from being flooded however prevents



water form tributary streams entering the River Usk during heavy rainfall due to the non-return valve systems at their entry points causing tributary streams to back up and flood.

During heavy rainfall some houses on Monmouth Road, Usk report they are unable use washing and toilet facilities as water does not dissipate into the sewerage system.

Due to flood fields on flood plains surrounding Usk are not suitable for housing developments, this limits the available land in Usk for development.

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

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

Infrastructure

In general, I support this policy however I am concerned there is insufficient capacity in our infrastructure in Usk and Little Mill. I recognise that adequate and efficient infrastructure is crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP.

Usk Primary School predict a future decline in pupil intake over the next four years and would welcome more family homes in Usk.

In Usk, our local GP surgery advise that although they have clinical capacity for a 40-home development however they advise that they do not have physical capacity. I have offered to meet with the practice manager and partners along with MCC Officers to see if support can be given to achieve this.

Our local dentist advise that they have no capacity for NHS patients however there is capacity for private patients

In Little Mill I am unaware of the GP capacities at Goytre or New Inn Surgeries that serve this area.



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:

Yes

Objection:

Housing Mix

I support the national guidance that new housing developments in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities.

I welcome the need to address the affordable homes shortage, and I would request consideration is given to the open market element of the developments to be a mix of 1 & 2 bed homes suitable for starter-homes or people wishing to down-size from larger properties.

Affordable Homes

I fully support and welcome that the Council is committed to ensuring that 50% of the homes constructed on new site allocations will be for affordable housing. However I acknowledge the planned development target of 1,153 affordable homes is below the predicted Local Housing Market Assessment figure of 3,085.

I understand that the High-Level Affordable Housing Viability Study demonstrates that on-site provision of 50% affordable homes is achievable.

Gypsy & Traveller communities

I support the requirement to identify suitable sites for our Gypsy & Traveller communities.



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

Is your representation in support or objection?

Support:

Mixed

Objection:

I have had representation from residents who are for and against this site proposal in Usk. The survey I conducted showed a small majority (50% for, 45% against) in favour of the development. I would support this majority who are in favour of this development in Usk provided local concerns are addressed.

HA11 Land east of Burrium Gate Usk

In October 2024, I conducted a survey with Usk residents.

There were **151** respondents.

75 (**50%**) respondents were in favour of a 40 home, zero carbon, 50% affordable housing development in Usk provided there was upgrades to infrastructure.

68 (**45%**) respondents were opposed to the development.

I have submitted the outcomes and comments of this survey to the Planning Team

Resident Concerns

- Extreme weather storm in May 2023 saw flooding at the neighbouring Burrium Gate development, assurances are required to ensure this is not repeated.
- During heavy rainfall some houses on Monmouth Road report they are unable to use washing and toilet facilities as water does not dissipate into the sewerage system.
- Burrium Gate Phase 2 sits on 2.6 hectares of land. Residents have raised concerns as to whether that the 1.7 hectares available below the 40m restricted build ridge line is sufficient space to accommodate 40 new homes and roads.
- That the existing hedges on the site are retained.
- That active travel and drainage improvements are made to the pavement along Monmouth Road.
- Fear that surface water run-off will be worsened by the development.
- That the town infrastructure does not have capacity.
- That air pollution will deteriorate from with the volume of extra vehicles.

We are told that MCC will be conducting drainage work on the Monmouth Road in January / February 2025. It is hoped this will improve the surface water flooding that is evident at this location.

It is understood that Welsh Water are currently upgrading the Craig Olway, Usk water treatment plant to increase capacity and to address the phosphate pollution issue.



The two developments at Little Mill

In October 2024, I conducted a survey with Little Mill residents.

There were **44** respondents.

10 (**23%**) respondents were in favour of a 35 home, zero carbon, 50% affordable housing development in Little Mill provided there were upgrades to infrastructure.

30 (**68%**) respondents were opposed to the development.

I have submitted the outcomes and comments of this survey to the Planning Team

HA15 Land East of Little Mill

The other Little Mill site, HA16, has planning consent for 15 homes, 60% affordable, residents question the necessity for a further 20 homes.

Residents are concerned that as there is an 800 home development proposal nearby at Mamhilad, Torfaen that this development is unnecessary.

Residents are concerned with lack of infrastructure in the village. The village has a village hall, a playground & MUGA, a chapel, the local public house (currently closed), limited bus service and there is no shop.

Residents are concerned that the water treatment works does not have sufficient capacity.

Residents are concerned for flooding from surface water run off from this site.

HA16 Land North of Little Mill

This site already has approved planning consent and is ready for development.

The local community council and some residents were against this development.

Residents question the need for the other 20 home development in Little Mill.

Gypsy and Travellers

I support the need to provide 7 pitches to accommodate unmet Gypsy and Traveller accommodation identified in the latest Gypsy and Traveller Accommodation Assessment.

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:

Yes

Objection:

S10- I support that Monmouthshire's economic profile is characterised by low unemployment levels, however a high economic inactivity rate, reflecting its increasing ageing population and shrinking working age population. Levels of commuters travelling out of County and the distances travelled have also been high historically. Combined, these factors are impacting on employment growth within Monmouthshire and the social sustainability of our communities. The RLDP seeks to address these issues by promoting a



growth level that will promote higher employment growth, support greater labour force retention and achieve a reduction in the net out-flow of commuters. I understand that the level of job growth aligns with the projected population and housing growth with a reduced level of commuting by retaining more of the resident workforce within the County.

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

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

I support the importance of protecting existing employment sites and premises over the Plan period to ensure there is an appropriate portfolio of employment land and premises that can be safeguarded from competing uses and provides for a sufficient quality, range and choice.

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

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

S12- I support the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration, and improvement in both urban and rural areas of Monmouthshire and I fully support green tourism.



**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:

Yes

Objection:

Usk is central to Monmouthshire however it is recognised as having limited public transport links. I support the improvements that have been made to the bus services we have in Usk and would like to see further improvements to evening bus services.

I understand there will be active travel improvements to the pavement on Monmouth Road, Usk.

I would like to see the project to develop a cycle route from Usk to Little Mill along the old disused railway line supported and realised. This will provide connections at the employment and education centres of Coleg Gwent, County Hall, BAE Systems and the communities of Little Mill, Glascoed, Prescoed & Monkswood with Usk and further afield to the New Inn/Pontypool upgraded railway station and the cycle system on the Mon-Brec Canal at Goytre Wharf.

**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:

Yes

Objection:

I support the need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands as a key objective of the RLDP



**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:

Yes

Objection:

I support that the Council is committed to protecting and enhancing community and recreation facilities, including open spaces, allotments and community growing areas and Areas of Amenity Importance to meet the needs of residents over the Plan period.

**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:

Yes

Objection:

Mineral- I support that the Council will sustainably manage its mineral resources.

Waste- I support that the local authorities are required to develop a sustainable approach to the management of waste, including the support of proposals which move the management of waste up the waste hierarchy, with waste prevention and re-use at the top of the hierarchy, followed by preparation for re-use, recycling, recovery and finally disposal.



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:

Yes

Objection:

- My understanding is this is the second attempt to bring the RLDP to Welsh Government approval. In 2021, under the previous administration there was a submission to Welsh Government to develop an additional 3,658 new homes on top of the approved developments, I believe this had cross party approval. Under the current administration the request is for an additional 2,160 homes on top of the approved developments or 270 per year for the duration of the RLDP.
- We have 2,064 households identified as being in need of affordable housing in Monmouthshire.
- Monmouthshire is a rural county of 88,000 hectares. The built-on equivalent is 3% or 2,640 hectares. Monmouthshire has only 2 brownfield sites, any new development will have to be on greenfield sites adjacent to current settlements.
- For the RLDP, in the Secondary Settlements of Usk, Penperlleni & Raglan the request is for 136 homes, equivalent to 17 homes per year over the 8-year period of the RLDP. For Usk this is the equivalent of 5 new homes per year.
- The Usk development of 40 homes represents a 3.5% increase on the current 1,155 homes.
- A further 40 homes in Usk could potentially provide the town council with an additional precept to fund projects for the community.
- There is limited affordable housing in Usk for essential workers i.e. emergency services staff, health and social care staff, nurses and teachers etc.
- The 2021 National Census showed Usk's overall population has decreased by 205 from 2,834 in 2011 to 2,629 in 2021.
- Our Over-65's demographic has increased by 152 (22%) from 687 to 839 in the same 10-year period.
- If young people, due to unaffordability, are forced to move away from an area, the settlement has a likely chance of becoming a retirement community with the possibility of services disappearing.
- Whereas full price market housing provision has tended to attract older people to retire in the town, an increased supply of affordable housing will attract younger people.
- Attached are two pdf files showing the outcomes of two surveys conducted in Usk and Little Mill along with the comments made by the respondents.



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:	Yes
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):		

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:	
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?

- New housing developments to have Welsh street names.
- Clearer language identification on road signposts to lessen confusion when reading.

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.

Little Mill Replacement Development Plan (RLDP) Survey Outcomes October 2024

44 respondents completed the survey. [REDACTED] and there were 3 listed as 'other'

10 (23%) respondents said 'Yes' or 'Yes, with infrastructure upgrade' to a 20 home, zero carbon, 50% affordable housing development in Little Mill.

30 (68%) respondents were opposed to the development.

6 (14%) respondents agreed there was a need for affordable housing in Little Mill.

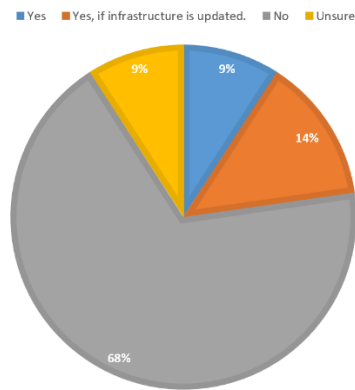
32 (73%) respondents felt there was not a need for affordable housing.

35 respondents left a comment. There were 7 comments in favour of a development and 25 comments opposed to a development in Usk

When asked:-

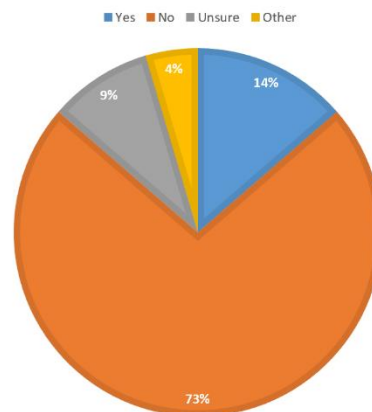
Would you like to see a 20 home, zero carbon, 50% affordable housing development in Little Mill?

Yes	4	(9%)
Yes, if infrastructure is updated.	6	(14%)
No	30	(68%)
Unsure	4	(9%)



Do you agree there is a demand for affordable housing in Little Mill? Affordable housing is a broad term used to describe a collection of government schemes where properties are offered at below-market value, either for sale or rent.

Yes	6	(14%)
No	32	(73%)
Unsure	4	(9%)
Other	2	(4%)



Comments in support of a 20 home, zero carbon, 50% affordable development in Little Mill.

1. Such a development should include road safety measures on the main road, including mini roundabouts on the junctions.
2. New house are needed desperately for to buy or rent

3. Homes for local people to rent or purchase is a must. Rent is high in this area and unaffordable for younger people, myself included.

Comments in support of development if infrastructure is upgraded.

1. This is not very much notice for a meeting - I'm sorry not to be able to attend. Are they proposing to resite the HV pylons from that field? Surely they can't build houses underneath it? the infrastructure including the road junction, the waste run off etc is a worry. We had the same argument with the other affordable houses proposed off Ty Draw Lane - affordable housing should be placed in towns with amenities not villages with no public transport
2. Please ensure that s106 agreement releases funding to develop the local railway line into a cycletrack to link this and other communities safely and sustainably.
3. Little Lill has very little offer families at present. I assume affordable housing would house mainly families. I am also concerned re increased traffic which would naturally come with increased housing and therefore increased pollution - new tenants would need cars to access amenities not provided in Little Mill esp if children in these families. Can the current sewage system cope with the extra population?
4. Comments made post public meeting (9th Oct) No objection to the plans for houses on proposed site, would like to have reassurance that speed limits would be maintained at 20 to cope with increased traffic; believe public transport shortfalls should be addressed for affordable housing provision; it is strange that they are considering building beneath HV cables but that does not affect my property; am concerned that the play park at Cae Melin does not appear to be protected (marked in pink);

Comments from respondents opposed to a housing development in Little Mill.

1. A rural area unsupported by MCC with no facilities or buses. Annual surface water flooding in Cae Melin as inadequate drainage, this soak away area removal will cause house flooding. Inadequate access road and the 4th building project in 2 years No more building.
2. I don't believe you have the infrastructure to support these houses. School transport is badly organised, doctors/dentists are unable to take new patients, council are cutting services left right and center not to mention the flooding in little mill and inability to manage that. Also how will people in social housing afford the extortionate MCC council tax? Or are you expecting people not in social housing to pick that up as well?
3. [REDACTED] and building on that area will cause a higher risk of surface and house flooding, both for the new houses and for the existing ones. During the winter/very heavy rain the brook can overflow upstream of the houses and uses that field as a run-off. Adding houses to an area without shops/and other infrastructure.
4. Impossible to achieve zero carbon development when little mill has poor active travel and public transport connectivity. With no key services within little mill not even a local shop the development will be car centric in nature. With so few services in little mill, this development will not support transport or planning policy which aims to reduce the need to travel. With a large development proposed near by at mamilhad, is another development in little mill required?
5. It is a rural location with no local facilities and not suitable for affordable houses. This overdevelopment will cause serious surface flooding which is already a problem for Cae Melin. I definitely object to this development.
6. Little mill has little to none amenities, to accommodate more housing. Flood water diverted in to Berthon Broke would be a huge flood hazard for the houses beside the broke. It regularly fills to capacity now.
7. Little Mill is already a busy and diverse village with very few amenities.

8. little mill is getting congested we have had more housing including social housing in the last few years than say Monkswood or any area between us and Usk. What about the derelict Beaufort pub land?, Cae Melin needs to be looked at and adopted once and for all by the council, no more excuses, it is not fair. Residents should be treated equally. Why push all the housing into the village? We have no more infrastructure than a field by say Glascoed, Alexandra place? Or on the way to Usk?
9. Little Mill is small - expanding would be to take away the essence of community. There is no shop or pub so how does this area contribute towards positive social behaviours?
10. Not needed, the residents don't want more housing, they move here for the countryside not to be overlooked by houses that aren't needed.
11. Our GPs are Usk, they struggle now, the service is being asked to take on more for Usk and little mill. Our healthcare will suffer. Cae Melin needs to be adopted and bought up to standard before adding more housing on.
12. Previous developers have not helped much with local area including water run off. Cae Melin not adopted yet due to substandard work. Recent disruption for 4 new houses in village - dug up Berthon Road, took weeks. Lack of infrastructure, bus routes, shops, amenities, social activities for those without transport.
13. proposed area is a green field, concerns re increased traffic, drainage issues, sewage, no amenities for shops poor public transport, poor paths to bus stops, impact on wildlife, broadband exchange is poor and probably couldn't cope with extra lines? surely better to keep green
14. Risk of flooding, roads already a poor state of disrepair, lack of green spaces. Research shows people need access to green spaces for mental health
15. Road floods on main road, drains block . More unnecessary cutting of trees. No facilities ie shop, pub. But increasing the population of little mill. New homes out of character with existing properties. Inpacked on highway safety. Negative effect on nature and conservation.
16. The village cannot accommodate this. There is no infrastructure and no amenities. It will also exacerbate serious flooding issues in LittleMill
17. The village has outgrown its capacity. There is no infrastructure, no extra money or facilities have been put into our village to accommodate so many people, cars. Cae Melin has yet to be adopted by Monmouthshire after years of promises. The councils needs to STOP, take a step back and look at the village, Cae Melin - trees are dangerous, verges, drains, all need attention not keep pushing more people + empty promises into our village. The noise/vibrations from the last builders - unbearable
18. The village is overcrowded and under resourced already regardless of the type of additional housing. Access, traffic sewage and even more reduced water runoff will make life harder for current residents particularly those living alongside the brook. The volume of traffic since the council offices have moved is ridiculous at rush hrs and adding access that close to the bridge will add to the disruption. The Park Davies development plan would surely negate the need for 20 more homes in Little Mill
19. The village is small enough as it is. Local facilities such as school and medical facilities are limited as it is. This is not a good idea
20. There has been an unsustainable push for building and affordable housing in our village over the last 20 years with no extra investment put in, the council are allowing planning but have yet to adopt Cae Melin Road from 2001? They need to stop trying to jump through hoops and start looking after their residents who find it increasingly difficult to report/get anything done in their street that they pay council tax when there is a problem and are fobbed off by the council.
21. There is no infrastructure in the village to cope with the demand for new houses.
22. there is planning permission for 900 houses plus "village" facilities Approx 1.5 miles away on the old Parke Davies/old nylon factory brownfield sites. With that in mind I question whether

there will be a demand for the 20 houses on the Little Mill proposed site I question whether brownfield site

23. There is very little infrastructure in the village. At the time of writing we have a village hall, a chapel and a non functioning pub. There is nothing for kids to do nor for young families to meet up.
24. There's no local amenities - residents will have to travel everywhere increasing the need for a car or a second car. Affordable housing benefits are then negated.
25. Mi rwyf n erbyn adaeladu 20 o dai yn cae Melin. Mi rydwyl yn defnyddio Yr ffordd bob dydd mi fydd 20 mwy o dai yn Yr ardal yma yn rhoi mwy o trafferth efo cerbydau... Ac swm.. Dwin siwr y bod yna llafydd eraill llawer mwy cyfleus I godi Tai nag yn ymyl cae Melin.....
I am against the building of 20 houses in Cae Melin. I use the road every day there will be 20 more houses in this area giving more trouble with vehicles... And noise.. I'm sure there are other places much more convenient to build houses than near Cae Melin

Comments from respondents who were unsure of future developments

1. There has just been a replacement development in Little Mill of affordable housing built, it has been noisy and disruptive, early starts, my light fittings have been rattling in Cae Melin a very small village with little infrastructure I don't think it can take many more houses/people. The plan CS0104 field floods onto Cae Melin when it rains heavily there is a rerouted stream running through it, you should know that already, I have photos you will flood our estate if you build on it!
2. Understand to need for affordable housing but only if its for locals who can't afford the inflated prices. Also the local schools are already full, so are plans to improve these? Also what about dentists/GP surgeries?
3. I don't object but, I have land with a building in Glascoed I applied to the Council to convert it to a Zero Carbon dwelling to live in but was turned down. I do not expect infrastructure just permission to build on my own land. It seems - 1 rule for developers and another for regular people.

Usk Replacement Development Plan (RLDP) Survey Results October 2024

151 respondents completed the survey. [REDACTED]
business owners, there were 3 listed as 'other'

75 (50%) respondents said 'Yes' or 'Yes, with infrastructure upgrade' to a 40 home, zero carbon, 50% affordable housing development in Usk.

68 (45%) respondents were opposed to the development.

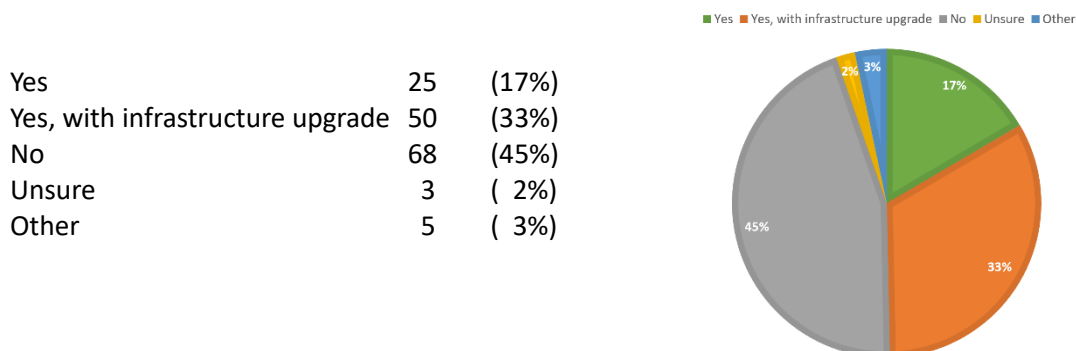
72 (48%) respondents agreed there was a need for affordable housing in Usk.

50 (34%) respondents felt there was not a need for affordable housing.

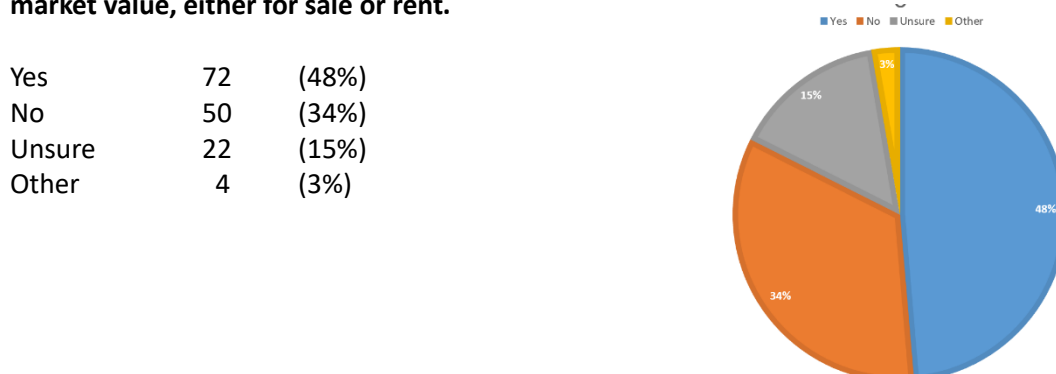
97 respondents left a comment. There were 42 comments in favour of a development and 51 comments opposed to a development in Usk.

When asked:-

Would you like to see a 40 home, zero carbon, 50% affordable housing development in Usk?



Do you agree there is a demand for affordable housing in Usk? Affordable housing is a broad term used to describe a collection of government schemes where properties are offered at below-market value, either for sale or rent.



Comments in support of a 40 home, zero carbon, 50% affordable housing development in Usk.

1. More affordable housing for people who have retired.
2. More house and more affordable development will help Usk sustain, and young adults to be able to stay in the area.
3. Prefer to see affordable set higher than 50%.

4. There should be a cycle track and a new footpath joining the town to the development. Although you want these people to shop and socialise in Usk efforts must be made to prevent an increase in motor traffic.
5. This depends what affordable housing means, eg social housing, shared ownership or smaller family homes or a mix if all which would be preferable.
6. Too many high-cost builds are preventing local young people from in town. There needs to be controls ensuring people don't buy them for rent or as second homes for more than initial 5 years. Needs to be protected for 50+ years.
7. What does zero carbon mean, are you just ticking boxes?? How will you assure the affordable housing will go to its intended target? This is wide open to abuse, especially in the long term!

Comments in support of development if infrastructure is upgraded.

1. A local lettings policy would ensure future customers have a link with Usk.
2. Additional housing will potentially have benefits for local businesses however the volume of traffic will increase and Use needs to have appropriate infrastructure including parking.
3. Affordable housing as long as this is for working home owners/families where they will be contributing to the community, no social housing.
4. Affordable housing should be ring fenced for young people from Usk before going on wider sale.
5. Agree with the reasons given for additional and particularly affordable housing in usk.
6. Better cycle tracks from the new estate to the town would help. Enforcing speed controls on Chepstow road should be included.
7. House prices in Usk are continually increasing vs average wages for key workers. If the town is to thrive in future we need our younger generations to have access to quality housing in the local area. That being said investment in housing needs to be match with investment in facilities to ensure growth is sustainable.
8. If you don't offer new houses the village will not expand with a younger group of people.
9. Lower income families are less likely to have access to a car so we need to make sure they have good safe access to walking and cycling routes that connect to the school, town centre and transport links.
10. More affordable homes for first time buyers.
11. Please ensure local sustainable links are funded through any developments. Eg cycletrack and tunnel.
12. Public transport needs to be improved for Usk as well as safe walking and cycling route from Sunnyside along railway through to the island as proposed previously utilising the old tunnel. Any approval for these new homes should be provisional based on gaining additional funding to complete this safe walking and cycling route as well as increased bus services to Usk.
13. Safe access to the development site is imperative. The effect of increased traffic in the high street of Usk Town needs to be considered. Rain water and drainage need to be considered to prevent further flooding in existing Burrium Gate area.
14. The surgery in Usk seems too busy and so we need extra capacity there as well.
15. **1.** Sewerage/storm water systems need updated to accommodate more houses. **2.** Existing roads need to be maintained. **3** School extension/new school? **4.** School bus transport to consider. **5.** Bank hub to be introduced. **6.** Car parking to accommodate more vehicles. **7.** To ensure a percentage of the housing is kept for local people to remain in the area where they were born and bred. **8.** Leisure centre to accommodate both older and younger residents.
16. 40 homes probably means 60 more vehicles, which will exacerbate parking difficulties in Usk. If Mon CC wants people to "cycle or scoot", where are the safe places to house these modes of transport in the village centre?

17. 40 houses is too big a number
18. [REDACTED] so adding more homes without considering the same happening on that site is going to cause a current problem to become a much bigger problem
19. Doctors and dentist already stretched to the limit - 40 houses with the potential of 4 per household - could the services cope with another 160 people
20. Houses should be for sale and re sale only to qualified Usk residents
21. I already struggle to get in to see the doctor/dentist. I struggle to park outside my own house and the flow of traffic outside my front door is high . The school is over subscribed. Our Main Street is so busy with traffic that it feels unsafe. More housing means this will all get worse. That's a worry.
22. I don't have an issue with this as long as there is capacity in the school and doctors, but both of these seem to be currently overstretched
23. I think before even thinking of building houses the local flood defences and other infrastructure improvement programmes should be implemented otherwise we will have more people living here than the area can cope with....this as already happened in Abergavenny, Gilwern etc
24. I think people are frustrated with how this is communicated and concerned about the impact on other services, GP services for example and public transport here is poor and takes too long to be useful. We also lack some leisure amenities when something could probably be done with the college to provide a reduced leisure centre service (at times that actually work for people with jobs). Recent building work by Burrium gate has meant that run off comes directly down and affects the estate.
25. If this site is selected 40 houses of mixed size seems a large number for the area. It's too far for most people to walk into Usk and parking restrictions are likely to be implemented. Worry about drainage needs to be considered with any planning applications
26. Keep people informed in an accessible way which means multiple means
27. The big question is whether the "affordable housing" is actually affordable for younger local people. I have my doubts. The other issues concern the road infrastructure and car parking. Can Usk really cope with even more traffic.
28. The catchment area for Usk Primary is not just Usk. The Health Board may say that the Surgery can cope with 40 more houses but the staff in there certainly can't. More cars? More water runoff?
29. The infrastructure to support the development is key and this includes access routes from outlying areas (the Usk community being uchaf wider than the town itself) and therefore access to parking etc for all the community is needed.
30. Not below market value, just build smaller homes
31. The questionnaire is flawed. It is too simple for a complex situation. People supportive if affordable housing would potentially answer differently if they knew that it is not ringfenced to locals who want to stay in area. Nor is it made clear that the focus on affordable housing and zero carbon limits other planning gain eg transport, open space, education, buses, road, doctors. There is no guarantee it will be used for Local families
32. The sewerage infrastructure would need to be updated first given the frequent current sewage spills. Improvements to public transport would also be a bonus for residents - buses and bike racks. Really welcome the proposals for improved facilities for youngsters - pump track and possible talk of youth club.
33. We're directly affected. We have been subject to flooding due to the inability of the sewerage system to cope with heavy rainfall. We would support the development as long as the appropriate infrastructure was put in place, including sewerage and traffic calming measures.

34. Would be helpful if some of affordable housing was ear marked for people who have connections with Usk but can't afford to live here.
35. Yes, it is important to provide housing for all sections of the community. It will be essential to ensure that the developers meet the eco standards and that the arrangements for storm water management and vehicle access to the new houses is adequate.

Comments from respondents opposed to a housing development in Usk.

1. 40 houses together is too much, there should be more smaller developments.
2. How will flood risk and impact on Usk river pollution be mitigated. What happened to the other sites previously in scope why have they been rejected but not this one? Develop other brown field sites first.
3. Affordable housing ceases to be so when sold on. There are insufficient jobs for so many new residents who will need to commute. The existing flooding, drainage, pollution and infrastructure problems are as yet not addressed for the existing population, and have no capacity to accept expansion.
4. Affordable housing is not suitable for Usk, as there is no local opportunity for work so people would have to travel which is difficult with the local transport system. We need better more frequent links with Newport/Monmouth to allow people to travel not everyone has the luxury of private cars.
5. Bad decision. Too crowded already
6. Building on more green land is not environmentally acceptable. The houses below Burrium Gate were flooded recently and the loss of more green land will only make this happen more frequently. Green land should be protected especially around a market town. Perhaps a nice wood instead of houses? Affordable houses, if they are needed, should be built closer to facilities and not "hidden " on the outskirts of the town. Smaller houses have recently been built in Usk. Perhaps these should have been affordable. Oops of course that was never going to happen.
7. Can the infrastructure cope? Can the drainage cope? That road is a nightmare. You are a spoiling a beautiful town cramming in so many houses for money.
8. Data shared at a public meeting demonstrate this development will not meet statutory environmental or commuting standards.
9. Does Usk really need more houses?
10. Don't build houses will ruin Usk
11. Flooding is a major issue for this site and I have little faith that it will / can be sorted adequately for the existing residents here let alone another 40 houses worth. Measures were supposedly put in place for Burrium Gate but they just don't work well enough. The steepness of the site will lead to most residents driving into Usk (I know we do!) and there already are significant parking issues there. Not against affordable housing but the site must be right or we'll be living with issues
12. From the meeting last night it seems that if we want the flooding, lack of pavements and the speeding to stop on the Monmouth Road we have to agree to new houses!!! [REDACTED]
13. Govt guidelines re phoshate levels are new developments should be no more than 0.1 mg/l but stream through Burrium Gate read 0.19 mg/l on 14/11/23 after heavy rain - dilutes the run-off. Hard to see how the "development can demonstrate phosphate neutrality or betterment". Flooding inevitable due to lack of natural moisture absorption through fields. 15 mins walk time back from town to top of site unrealistic for OAP or mum+baby in pram and toddler. Hedge removal needed to enable wider pavement. not on inappropriate green sites

14. I do not want such a development on my doorstep. Flooding off the fields is a concerning issue. It's a quiet area that will get busier and noisier.
15. If there is a decline in population why are more homes needed. Local youngsters by fact are moving out of affordable homes because they are forced to live next to MCC properties filled with homeless people. The officer who launched this has now left. Better management of existing affordable assets is more sustainable and effective. Modern statutory build standards are perfectly adequate in the quest for net zero and money would be better spent on infrastructure and town improvements
16. I'm very worried about the impact building more houses will have on flood risk. [REDACTED]
[REDACTED]
17. Infrastructure won't cope with anymore houses. Burrium Gate is a mass of houses . Barratts were greedy developing so many houses . We don't want any more green areas spoilt with more building. Usk is totally unaffordable for [REDACTED] . Affordable still won't be Affordable
18. Infrastructure, drs. capacity, and nature's environment need to be investigated and results publicised. There have been many incidents of roads having burst pipes , one drs in usk closed due to retirement and usk residents had to register at trellech. Meadowland home to many species including pollinators which are in decline. Would this be a 40 house then stop building? Many issues...? s. Risk of runoff flooding for existing properties
19. It does not feel as though Usk can sustain a development of this size. Usk's infrastructure (specifically roads and parking) are already problematic. There are also inevitable negative environmental effects building on the proposed green site.
20. It may have an effect on owned property prices.
21. Local services under strain GP and dentist already building work would be disrupted throughout the countryside and visual scenery would be impacted. Risk of flooding would increase welcome new houses and welcome younger demographic but also moved from London for more peaceful, quiet scenery which will now be disrupted.
22. Many people in usk already think you have made the decision. So don't participate in the survey. Many residents are thinking of moving due to this and other factors
23. No need for more affordable homes as there has been no waiting list for the ones at Castle Wood for the last 6 years! In fact two are now rented from MCC and another two are going to be used to house homeless people. None of these people are from the Usk area.
24. No provision mentioned for safeguarding existing housing from flooding by surface water created by new housing. What guarantee affordable housing go to local key workers? More congestion and environmental degradation since no scope to widen roads, update old sewers. . Build a new bridge, then look at expanding housing.
25. Our environmental and lack of infrastructure objections are just being ignored
26. Our flood barrier is unfit..more building less green space...more flooding..
27. Parking is a problem in usk at the moment with an increase in on street parking making through travelling difficult. public transport is terrible. the increase to the public sewage system there is ongoing complaints about welsh water allowing sewage into the river Usk. perhaps the developers should be asked to contribute a percentage of their profits towards upgrading the sewage system
28. Please look at the Monmouth Road this morning! Also the water running down from Castle Oak and Ladyhill. Serious concerns about flooding. May be not today, but has in the past and will again in the future.
29. Residential development in Usk does not match government policy on MMGW and commuting
30. RLDP Plans for Sustainability are inadequate. RLDP compliance measurements inadequate, page 142 – how will residents know they've been met? Impact on overland drainage flow - BG already unable to cope Negative impact on air quality (Nitrogen Dioxide already

exceeded, Bridge Street) Flood risk + Site is located within the River Usk phosphorus catchment area Usk does not have the infrastructure to support more new housing for a younger demographic. The site in Usk is not suitable for any building: reasons- please see below - and I cannot see how it would be financially viable to set right everything which would need to be in place in order for these 20 homes to be safely built. It's not just infrastructure, it is all the existing flooding/drainage/surface water which needs to be addressed + phosphorous sensitive catchment area + proximity to Usk's AQMA. I will follow up with a more detailed email.

31. Ruining the look of usk
32. Should not be developing a SSSI beyond boundaries of existing town as the infrastructure is not in place
33. Surgery dentist school roads and sewage can't cope
34. The clamp.down needs to be on owning second homes, not building more.
35. The infrastructure in Usk is not suitable for more houses. The main road is always flooding, there is regularly pollution producing congestion going through the Main Street, which is dangerously narrow for children walking along the pavements and the Drs surgery and school will become over run if there is a significant housing development. Updates to the infrastructure will not be possible as shown by the problems associated with the repeated pipes bursting.
36. The school is completely overcrowded already. Only 1 Doctors Surgery. Not enough parking in town. There are so many cars already coming out of Ladyhill/Burrium to join the Monmouth Road at rush hour. If we have to have more houses maybe they should be elsewhere in Usk rather than keep adding more and more houses in this area.
37. The town cannot cope with more houses. This will be more commuters and if 50% are affordable the other 50% will be mega expensive so the builder can make money. 40 houses will be at least 80 cars. Burrium gate is an area for speeding so dangerous. What about about the flooding last year. Still nothing do and another winter coming. What about our river and Welsh water? Affordable. Only if they are made available to Usk families AND remain affordable and can't be sold off to the private market place or back to MCC as happened this year and last
38. The town has no facilities to support a further 40 homes
39. There are affordable homes in Castle Wood. At present two of them are empty because potential residents were unable to afford them. [REDACTED]
[REDACTED] Affordable homes in Usk are still too expensive for many people. Also, why are all the affordable houses built on the outskirts of the town? Surely low income families would find it cheaper to live closer to facilities? There are no facilities for families at this end of the town and walking into town is a very unpleasant experience.
40. There are more convenient places in monmouthshire to live with better transport and infrastructure. It is very difficult to travel to work from Usk without a car. There are more affordable places to live in general.
41. There is already a water disposal issue. Traffic congestion and insufficient doctors
42. There is not the infrastructure for 40 new homes in Usk. The GP practice is already beyond capacity. 40 homes will mean 40 families, approx 160 extra people
43. This site is prone to flooding, which affects the gardens of the houses parallel to the proposed site. Also the proposed site is higher than the adjacent houses which could further flooding issues. The main Monmouth road opposite Burrium Gate floods in heavy rainfall and this development would increase this problem. With the current global warming situation causing much heavier rainfall any more development would only exacerbate the situation.
44. Using the words affordable and carbon neutral is quite emotive and confusing. Affordable house prices and rents are set at a percentage of the price of local housing. This would make

them in the £200,000 bracket and out of the reach of many young people. Whilst the houses might be carbon neutral, the footprint of their residents will certainly not be. Being so far out of town and with dangerous roads most journeys will probably be made by car, adding to the already heavy traffic.

45. Usk cannot cope
46. Usk doesn't have the infrastructure/facilities to support this proposal
47. Usk is already on overload with vehicles, traffic and support in living conditions such as sewage , poor repairs from council of pavements etc. car parks are full of vehicles day and night of workers and resident vehicles. Usk visually has become a scruffy looking town with little or no repair to Main Street buildings. Does this mean also that my council tax will now go up again to cover the cost of affordable housing amenities. The tax is already outrageously high .
48. Usk cannot cope with more homes.
49. Usk is already over populated and the proposed development will make matters worse. Drainage is already a problem as is phosphate in the water. Being a travel to work area more cars will add to this problem. Monmouth Road is already congested. Water leaving the existing estate is already an issue with the bottom leading from Burrium Gate to Monmouth road regularly flooded. The height of the land proposed for development is likely to add to water and sewage displacement issue.
50. Usk is already over populated.
51. We all know this area cannot sustain the water run off my back garden floods every year from this field. Please don't tell me "it can be managed" because it currently isn't and it is a common sight to see a row of water tankers taking excess water away from the Monmouth Road area. [REDACTED] and the next 7 of relative peace. Now you want to inflict more construction misery upon us. We have been very badly let down by our council and local politicians

Comments from respondents who were unsure of future developments

1. Nature and ecological survey imperative before plan approved at different seasons of year.
2. Recently arrived resident - unsure as yet as to local needs.
3. Unacceptable for the officers of the council to try to hide the data in thousands of pages. While we came to meeting in support of the 20 houses we do not believe the bar has been met. As was raised in the meeting a lot of the growth targets will be met by natural growth. While I would want the extra homes the presentation on Monday did not demonstrate that the risks raised were mitigated. The officers should have provided you with a dozen clear sliders showing why they believed this to be the case. Not hide the information in thousands of pages.
4. When thinking about expanding the footprint of Usk Town it is important to consider the needs of all residents and future residents. Usk is an expensive place to live with high rates of council tax. Living on the outskirts of Town should afford the same experience as living in the centre of Town. Only a few years ago I had to complain as our street lights were turned off at night whereas those in the centre of town were not. An equal experience for everyone should be a consideration.

3562

Gateway to Wales Action Group

Monmouthshire County Council Replacement Local Development Plan (RLDP)

Objections for Site HA4 (CS0270) Land on Dixon Road, Monmouth

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

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

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

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

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

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

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

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

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

Candidate Sites

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

I think that they have selected the wrong site.

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

[Refer to Report Page 2]

The Council also seemed to ignore the ranking data from the Integrated Sustainability Appraisal (ISA) which when average placed the Wonastow Road site as the highest rank and the Dixon Road site as the lowest rank.

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

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

[Refer to Report Page 3]

1. Test of Soundness

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

1.1 Lack of clarity around site names

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

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

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

It has been called in the RLDP as

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

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

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

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

1.2. Public Consultation at Times that Discourage Responses

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

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

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

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

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

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

1.3 Consultations Response Form Limits Public Responses

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

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

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



Monmouthshire County Council is preparing a Monmouthshire Replacement Local Development Plan (RLDP) for the period from 2018-2033. The RLDP will allocate land for sustainable development, designate land for protection and contain policies to provide the basis for decisions on planning applications.

Monmouthshire RLDP Deposit Plan Summary

Monmouthshire RLDP Deposit Plan

Have your say

The public consultation is open from Monday 4th November and will close on Monday 16th December

Click here to submit your comments

What does this mean for my area?

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

The screenshot shows a web browser window displaying the 'Monmouthshire Deposit Plan Representation Form'. The browser's address bar shows the URL 'https://www.monmouthshire.gov.uk/...'. The page has a blue header with the Monmouthshire Council logo and the title 'Monmouthshire Deposit Plan Representation Form'. Below the header, there is a section titled 'Part 1: Contact Details' with two input fields: '1. Title' and '2. Name'. The page also features a sidebar on the left with the Welsh text 'Cynllun Datblygu Lleol Amnewid 2018-2033' and a vertical list of icons. The main content area contains text about the 'Replacement Local Development Plan 2018-2033' and a 'Click here to submit your comments' link.

It then leads to a number of questions such as

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

Then

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

You cannot go on unless you say yes or no

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

Submit followed by

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

[Words such as “Spatial Strategy” are planning jargon that may not be understood by people of a lower reading age.]

Submit followed by

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

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

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

Submit followed by

26. Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

Submit followed by

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

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

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

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

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

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

Submit followed by

Appearance at Examination Hearing Sessions

Submit followed by

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

Submit followed by

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

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

Submit followed by

32. What age group do you fall within?

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

34. Nationality

35. What gender do you identify as?

36. What is your sexual orientation?

37. What is your ethnicity?

38. What is your religion or belief?

39. Disability is defined by the Equality Act 2010

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

Submit and end

Web form discourages responses

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

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

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

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

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



Mae Cyngor Sir Fynwy yn parhau Cynllun Datblygu Lleol Newydd (CDLIN) ar gyfer y cyfnod rhwng 2018 a 2033. Bydd y CDLIN yn dyanu tir ar gyfer datblygu cynaliadwy, yn dynodi dir i'w amddiffyn ac yn cynnwys polisiau i ddarparu sail ar gyfer penderfyniadau ar geisio deau cynllunio.

Cynodeb Cynllun Adnewydd CDLIN Sir Fynwy

Cynllun Adnewydd CDLIN Sir Fynwy

Beth mae hyn yn ei olygu i fy ardal i?

Dweud eich Dweud

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

Cliciwch yma i gyflwyno eich sylwadau

Digwyddiadau ymgysylltu

Digwyddiadau Ymgysylltu Cefn Heilio Mewn

[source [Ymgynghoriad ar Gynllun Datblygu Lleol Newydd \(CDLIN\) 2024 - Monmouthshire](#)]

1.5 The alternative ways of responding were simpler and not highlighted

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

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

1.6 Consultees found the Web Form Overly Complicated

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

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

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

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

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

1.6 Is the RLDP consultation still Valid?

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

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

1.7 The Sweetman Ruling

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

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

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

Key Points of the Ruling:

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

Mitigation vs. Screening:

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

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

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

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

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

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

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

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

2. Objections to the RLDP

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

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

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

2.1 Water Quality

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

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

It is for obvious reasons.

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

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

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

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

[Refer to Report Page 5]

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

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

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

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

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

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

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

2.2 Drinking Water Contamination

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

[Refer to Report Pages 6 and 7]

Notice 1 – Runoff Pollution

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

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

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

DWR-2023-00003 Monmouth WTW and Court Farm WTW

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

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

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

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

Drinking Water Inspectorate Annual Report for Wales 2021

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

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

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

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

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

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

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

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

Notice 2 – Cryptosporidium

DWI Notice about Cryptosporidium April 2024 DWR-2023-00011 [

<https://www.dwi.gov.uk/water-companies/improvement-programmes/dwr-cymru-welsh-water-improvement-programmes/dwr-2023-00011/>]

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

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

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

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

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

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

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

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

[Source: [News article – Monmouthshire Beacon](#)]

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

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

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

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

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

2.3 Surface Runoff Pollution

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

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

Surface Runoff Pollution regularly flows into the River Wye

Sources of domestic phosphate pollutants in rainwater runoff

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

[Source: [Minnesota Stormwater Manual](#)]

2.4 Raising Phosphate Levels in the River Wye

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

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

“Compliance Assessment of Welsh River SACs against Phosphorus Targets”

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

[Refer to Map on Page 9 of the Report]

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

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

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

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

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

2.4.1 Phosphate Calculations

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

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

[Refer to Report Page 10]

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

Phosphate Runoff from HA4 (Including use of SuDS)

16Kg of Phosphates

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

Increased Phosphate Runoff entering the River Wye

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

Source: [Phosphate Budget Calculator \(somerset.gov.uk\)](https://somerset.gov.uk/phosphate-budget-calculator)]

2.5 Upgrade to Welsh Water Waste Treatment Works

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

[Refer to Report Page 11]

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

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

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

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

[Source : [Storm overflow map](#) | [Dŵr Cymru Welsh Water](#)

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

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

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

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

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

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

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

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

The sewer upgrade would be expensive.

Sewer upgrade costs could reduce the 50% affordable housing

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

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

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

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

2.7 Storm Overflow of Phosphates will continue

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

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

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

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

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

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

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

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

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

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

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

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

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

2.8.1 SuDS removes only 15% to 24% of Phosphates

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

A Brunel University report looks at the effectiveness of SuDS.

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

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

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

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

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

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

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

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

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

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

This is from a section of their SuDS report "**Will the ground accept water?**"

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

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

[Refer to Report Page 13]

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

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

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

[Source: Landis Soilscales Viewer - <https://www.landis.org.uk/soilscales/>]

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

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

[Refer to Report Page 14]

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

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

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

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

2.10 SuDS Pond has been situated in a Flood Zone

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

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

[Refer to Report – Page 15]

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

2.11 Traffic Congestion on Traffic Hotspot (Dixton Roundabout)

Dixton Roundabout is a Major Traffic Pinch Point

The entrance to the candidate site (CS0270) is only 100 metres from the congested Dixton Roundabout. This is the intersection of the A40 Trunk road and the A466 Dixton Road, an arterial road. This regularly faces heavy congestion, which is well known to motorists driving to Cardiff from the Midlands and the North of England.

Monmouth already has very difficult traffic due to difficult geography

[Refer to Report Page 16]

2.11.1 Increased congestion

270 new houses would mean an increase of 405 vehicles.

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

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

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

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

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

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

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

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

2.11.2 Long distance commuters

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

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

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

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

2.11.3 Conflicts with Policy ST1

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

Policy ST1 - Sustainable Transport Proposals

“Developments that are likely to create significant additional road traffic growth, or adversely affect the safe and efficient operation of the highway system will not be permitted.”

2.11.4 Conflicts with Policy ST2

Policy ST2 – Highway Hierarchy also looks like it is breached

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

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

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

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

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

The A466 (Dixon Road) is an arterial route.

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

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

2.11.5 ISA Concerns

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

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

2.11.6 Lack of Traffic Assessment

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

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

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

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

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

2.12 Air Pollution

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

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

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

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

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

[Refer to Report Page 17]

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

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

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

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

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

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

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

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

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

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

2.14 Loss of habitat for Endangered Greater Horseshoe Bats

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

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

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

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

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

Building housing will

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

How could this possibly benefit the bats?

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

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

Monmouthshire Council has a legal obligation to protect biodiversity.

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

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

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

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

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

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

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

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

[Refer to Report Page 20]

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

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

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

Greater Horseshoe Bat - Primary habitats/features

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

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

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

2.14.3 The 1Km Juvenile Sustenance Zone is Not Valid

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

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

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

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

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

The Core Sustenance Zone is 3Km.

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

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

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

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

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

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

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

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

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

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

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

“The effective conservation of the Greater horseshoe bat depends on the sensitive management of the farmed and forested landscape around maternity roosts and other sites used by the bats. Cumulatively, changes in agricultural management including: abandonment of grazing land; use of pesticides; hedgerow removal; can impact both horseshoe bat species”.

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

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

Monmouthshire Council has a legal obligation to protect biodiversity

The Environment (Wales) Act 2016

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

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

[Source: [Monmouthshire Local Nature Recovery Action Plan](#)]

2.14.3 Sweetman Ruling

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

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

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

Key Points of the Ruling:

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

Mitigation vs. Screening:

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

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

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

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

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

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

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

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

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

1. Dilution of Protection for the Greater Horseshoe Bats

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

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

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

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

Monmouthshire County Council's response was.

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

Here is a link to the HRA - [Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan](#)

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

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

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

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

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

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

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

[Habitats regulations assessments: protecting a European site - GOV.UK](#)

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

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

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

4. Assess the likely significant effect

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

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

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

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

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

[Refer to Report – Pages 24 to 27]

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

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

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

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

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

2.15.1 Example of an AONB Setting - Chilterns AONB

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

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

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

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

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

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

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

[Source: [2019-2024 Chilterns Management Plan DEVELOPMENT_compressed.pdf](#)]

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

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

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

The site is visible for two main reasons.

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

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

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

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

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

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

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

2.15.3 Dark Skies and the AONB

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

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

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

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

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

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

2.15.4 Objections from the Wye Valley National Landscape

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[Refer to report Pages 28 to 30]

2.16.1 LANDMAP sensitivity value of Outstanding/ High for historical interest

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

It is close to a number of Historic Features

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

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

2.16.2 A Historically Sensitive Site

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

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

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

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

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

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

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

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

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

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

Development within 500 metres of a Scheduled Ancient Monument

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

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

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

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

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

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

[Source Technical advice note (TAN) 24: the historic environment

[<https://www.gov.wales/technical-advice-note-tan-24-historic-environment>]

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

2.16.3 Objections from Cadw

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

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

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

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

2.17 Loss of Prime Agricultural Land

[Refer to report – Pages 31 to 33]

Welsh Planning Rules State

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

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

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

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

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

Source: **Predictive Agricultural Land Classification (ALC) Map 2**
[Welsh Government]

https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2

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

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

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

2.17.1 Agricultural Land Assessment confirmed in the ISA

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

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

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

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

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

“development should be directed to land of the lowest grade”

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

2.18 Landscape Sensitivity

[Refer to Report Page 34]

Monmouthshire Council’s Landscape Sensitivity report recommends

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

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

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

[Natural Resources NRW [Landscape Sensitivity Website Page](#)]

HA4 Dixon Road Site Landscape Sensitivity is High/ Medium

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

[Source: [Monmouthshire LLCAs](#)]

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

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

2.19 Flooding to Site Entrance

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

[Refer to Report – Pages 35 – 37]

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

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

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

The Wonastow Road site has less flooding issues

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

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

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

2.20 Is 50% Affordable Housing realistic?

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

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

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

“Philip Barnes, Group Land Director at Barratt Developments, warned that the affordable housing policy would deter developers from building on green belt land.

In a blog post published last week (28 August), he said that Barratt has pulled three “in-flight” planning applications being prepared on draft allocated sites “because the spectre of 50% renders the scheme unviable due to the unacceptably reduced (or removed) land value for the landowner”.

According to Barnes, existing green belt sites in a draft local plan allocated for housing “will not be able to provide 50% affordable housing”.

He added: “Even a Reg 18 plan will have been viability tested against a lower affordable housing percentage, so a change to the 50% affordable ‘ask’ will upend the whole plan.

Barnes, who said he has discussed the changes with “peers, public and private sector planners, land agents, lawyers, land promoters and landowners”, also raised questions about the consultation’s land value proposals.

“Everyone seems to be in full agreement – namely that the proposed disruption to the land market is likely to cause many in-flight schemes to be abandoned and stymie many other upcoming projects,” he said.

“Why? Because many landowners aren’t going to sell their land in such a policy environment.”

It should be noted that Philip Barnes, Group Land Director at Barratt Developments works for the same organisation Barratt Redrow plc, that are the developer for the HA4 Dixton Road site.

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

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

Such “unexpected costs” may include

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

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

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

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

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

“Developers can use viability assessments to argue that building affordable homes could reduce their profits below competitive levels, which they define as around 20%. This gives them a legal right to cut their affordable housing quota.

That means developers can overpay for land to guarantee they win sites, safe in the knowledge they will be able to recoup the costs later by

squeezing out affordable housing. The same is true for land promoters, who often negotiate away affordable housing quotas before selling sites on to developers. This viability loophole is contributing to the country’s affordable housing drought, reducing the social diversity and vitality of rural communities.”

2.20.1 Monmouthshire Council has accepted lower percentages

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

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

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

"The committee was told the council's usual policy would require 35 per cent of the homes, on site, to be affordable but planning officer Amy Longford said its independent consultants had accepted that would make the development "unviable".

Instead the council will accept a contribution "just shy" of £20,000 towards affordable housing elsewhere in the county, which will be secured through a section 106 legal agreement."

[Source: Monmouthshire Beacon – [Sex Education shop to be knocked down](https://www.monmouthshirebeacon.co.uk) | [monmouthshirebeacon.co.uk](https://www.monmouthshirebeacon.co.uk)]

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

2.21 Spatial Strategy – Share of settlements

Is Chepstow getting its fair share of housing?

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

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

Housing Allocation Primary Settlements

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

2.22 Policy GW1 – Green Wedges

Policy GW1 Green Wedge Designations do not include Monmouth.

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

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

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

2.23 Welsh Language

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

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

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

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

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

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

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

3. Alternative Site for Monmouth

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

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

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

[Refer to Report – Pages 40 – 41]

3.1 CS0274 Wonastow Road is a better site for Monmouth

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

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

- Siltbusters
- Triwall
- Singleton Court
- Mandarin Stone

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

The Wonastow Road Site is better served by Active Travel.

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

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

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

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

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

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

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

In contrast Site HA4 Dixon Road ranks the lowest.

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

[Source: My analysis of results from the Monmouthshire Council's Integrated Sustainability Appraisal (ISA) report

<https://www.monmouthshire.gov.uk/app/uploads/2024/10/Monmouthshire-RIDP-ISA-Report.pdf>]

Monmouthshire County Council seem to have ignored this information.

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

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

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

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

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

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

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

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

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

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

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

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

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

Resolution 1 – Concerns about the site on Dixton Road

[Source: Extract of meeting minutes

(Public Pack)Minutes Document for Full Council, 18/11/2024 19:00]

It was resolved to make the following recommendation to Full Council in response to the RLDP Consultation on the Leasbrook (Dixton Road) Site:

- (i) There is a need for affordable housing in Monmouth;
- (ii) Uncertainty regarding the suitability of location for the development due to :
 - Extensive local objections,
 - the lack of employment land nearby,
 - the potential increase in traffic congestion and subsequent air pollution,
 - the potential decline in drinking water quality,

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

Resolution 2 – Suitability of the CS0274 Wonastow Road Site

(b) It was resolved to make the following recommendation to Full Council in response to the RLDP Consultation on the CS074 (Land at Wonastow Road) Site:

- (i) There is a need for more housing in Monmouth particularly affordable housing;
- (ii) **The site was deemed suitable for a development** of the proposed size due to:

- Its proximity to the National Cycle trail and Active Travel route,
- it is closer to employment and retail infrastructure,
- it is in-keeping with surrounding developments and is down-stream of the [Welsh Water Treatment Works] WWTW, therefore, less likely to be impacted by the poor drinking water quality."

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

Monmouth Town Council have made it quite clear that the CS0274 Wonastow Road site is the better site for Monmouth.

4. Conclusion

Based on the detailed analysis above, the proposed development at Dixon Road, Monmouth (HA4, also known as Leasbrook, CS0270), is inappropriate due to significant issues across several critical categories:

Environmental Sensitivity

- The site is within 1km of the Newton Court SSSI, home to endangered Greater Horseshoe Bats. Development would destroy crucial bat habitats, including foraging grounds, commuting routes, and hedgerows, while introducing harmful artificial lighting.
- It is within the highly sensitive landscape setting of the Wye Valley AONB and the Dixon Mound Scheduled Monument, both protected areas of national importance.
- Development would result in the loss of high-quality prime agricultural land (80% Grade 2), contrary to national planning policy, which prioritizes lower-grade land for development.

Water Quality and Pollution Risks

- The site poses a direct risk to Monmouth's drinking water, drawn from the River Wye, a Special Area of Conservation (SAC). The river is already under advisory notices for contaminants, including *Cryptosporidium*, with necessary upgrades to water treatment delayed until 2030.
- Surface runoff pollution from clay-heavy soil would exacerbate phosphate levels in the River Wye, with SuDS drainage solutions shown to be ineffective for phosphate removal in this context.

- Rainfall runoff would flow into waterways only 400m upstream of the drinking water extraction point, creating additional health and ecological risks.

Traffic Congestion and Air Pollution

- The entrance to the site is only 100m from the congested Dixon Roundabout, a known bottleneck for Monmouth. Adding 405 vehicles (270 houses) would further increase journey times and delays for residents.
- The development would generate an estimated 476 tonnes of CO2 annually and increase local air pollution. Monmouthshire currently lacks proper monitoring of PM2.5, a more dangerous pollutant.
- Active travel options are limited, with no nearby cycle routes or pedestrian-friendly infrastructure, making car reliance inevitable. In contrast, the alternative Wonastow Road site is well-served by cycling and walking routes.

Flooding Risks

- Approximately 15% of the site lies in a flood zone, which could hinder emergency access.
- The alternative Wonastow Road site has minimal flood risk (5%) and better infrastructure for addressing surface water challenges.

Failure to Follow Policy Guidance

- The site selection contradicts Planning Policy Wales, which emphasizes prioritizing lower-grade agricultural land, avoiding sensitive landscapes, and protecting biodiversity.
- The Sweetman Judgement was not taken into account when screening a site for loss of functionally-linked land within the 3Km Cores Sustainance Zone of a Natura 200 (European Site)

I believe that the development at HA4 Dixon Road is incompatible with sustainable development goals, biodiversity protections, and responsible urban planning.

The alternative site at Wonastow Road (CS0274) provides a far better option for delivering much-needed housing while protecting Monmouth's environment, heritage, and infrastructure.

Monmouthshire County Council must reassess this proposal and prioritize sustainable, appropriate development.

Monmouth is the Jewel in Its Surrounding Countryside
- let's keep it that way

14 December 2024.

CS0274 (Wonastow Road) is a More Suitable Site

Site Number	CS0270	CS0274
Site Name	Dixton Road/ Leasbrook	Land at Wonastow Road
Number of Houses	270	175
Social Housing Provision	50%	50%
Employment Land	No	2 hectares
Near an Active Travel Route	Nearest Cycle Lane 2km away	National Cycle Route 423 passes the site. Active Travel routes planned.
Upstream of Drinking Water Supply	Yes	No
In area falling SAC Phosphate Targets	Yes	No
Prime Agricultural Land	Grade 2 (80%)	Grade 3a (80%)
Bats - site in 3km Core Sustenance Zone	Yes - within 1Km of natural bat roost	No
In Landscape Setting of AONB	Yes Within 250 metres of Wye Valley AONB	No
Setting of Scheduled Monument	Yes within 100 metres of Dixton Mound	No
Flooding - In Zone 2 and 3	Around 15%	Around 5%
Traffic Congestion to Trunk Roads	High - with 150 metres of major pinch point - Dixton Roundabout	Medium
LANDMAP Landscape Sensitivity	High/Medium	Medium

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



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

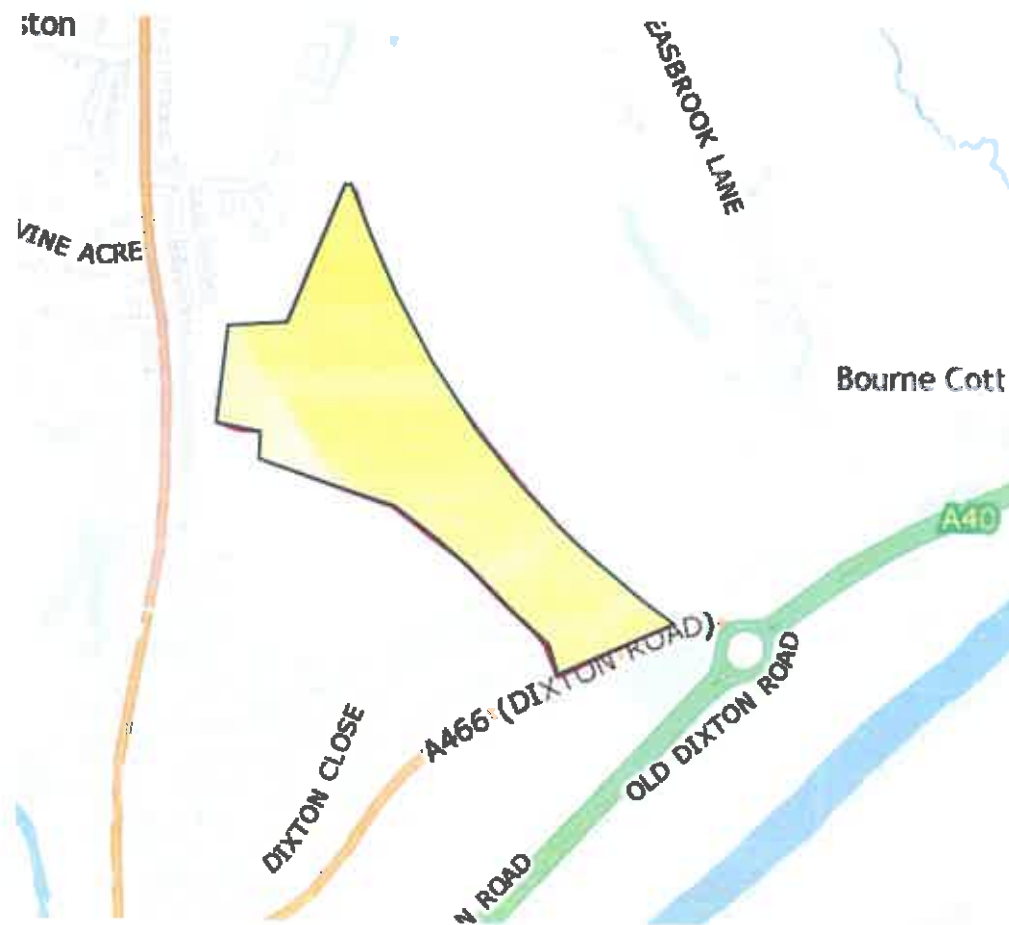
In September 2023 Scrutiny Committee Meeting, Monmouthshire Council highlighted three candidate sites

Page 22



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

The HA4 Dixon Road Site is a Sensitive Site



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

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

[Sources [7] People per household in Monmouthshire is 2.29 – Welsh Government [Average household size (persons) by local authority and year (gov.wales)]

[8] Cats per household 0.861. Dogs per household 0.987 So 266 dogs and 232 cats. – Figures from Defra for NP25 postcode [Dogs per household per postcode district - data.gov.uk and Cats per household per postcode district - data.gov.uk]

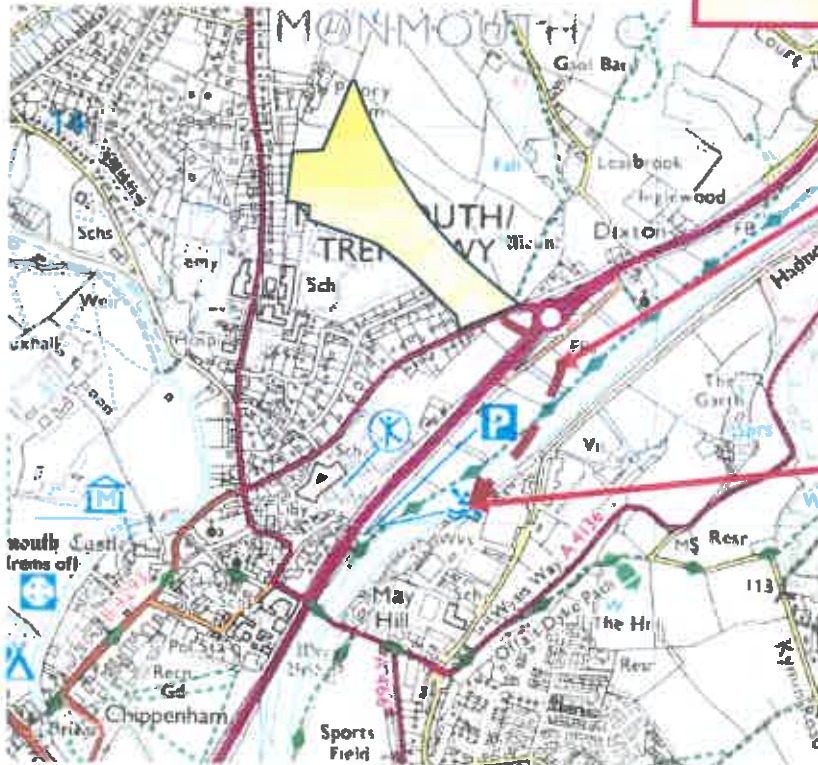
[9] Average of 1.5 Cars per household in Monmouthshire [OC] Average number of cars per household, England & Wales, Census 2021 : r/dataisbeautiful (reddit.com)]

The Golden Rule of Water Quality

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

Monmouth's drinking water comes from the polluted River Wye

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



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



1. Drinking Water Contamination

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

Monmouth's drinking water comes from the polluted River Wye

It is already under two notices from the Drinking Water Inspectorate



- Risk of crypto breakthrough through existing treatment processes into final water. (Potential for elevated levels of Cryptosporidium due to its presence in the raw water). [4]
- Potential risks from Taste, Odour, Pesticides, Pollution [5]

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



[Source: [News article - Monmouthshire Beacon](#)]

Source :

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

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

Monmouth's Water is Very Susceptible to Runoff Pollution

- **Freedom of Information Request**
The first notice was following a taste and odour event in June 2021, in which 73 consumers reported an unusual taste and/or odour downstream of these two works.
- The cause was a contamination of **hydrocarbons and volatile fatty acids** on the River Wye although no conclusive pollution source was identified

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



2. Surface Runoff Pollution

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

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



Surface
Runoff
Pollution
regularly flows
into the River
Wye

[Resident Photo taken on Hereford Road 21 September 2024]

Sources of domestic phosphate pollutants in rainwater runoff [6]

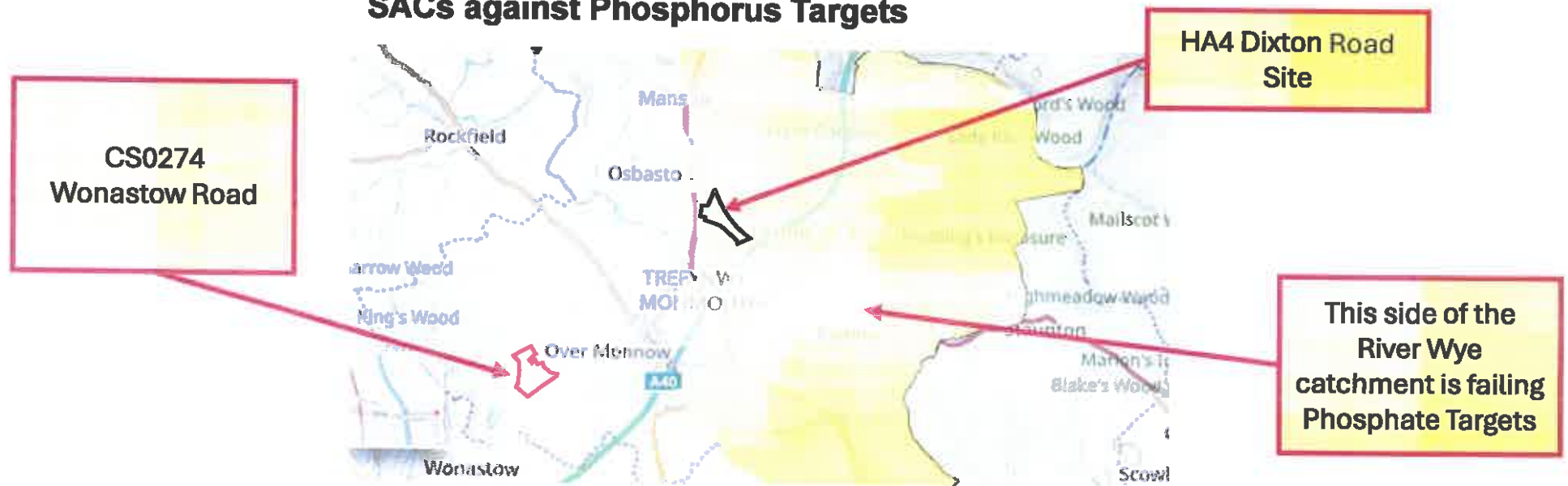
- Weedkillers and pesticides
- Cleaning products
- Cat and dog poo
- Road salt
- Decomposition from compost heaps and fallen leaves.

[Source: [6] [Minnesota Stormwater Manual](#)]

3. Raising Phosphate Levels in the River Wye

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

Compliance Assessment of Welsh River SACs against Phosphorus Targets



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

Raising Phosphate Levels in the River Wye

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

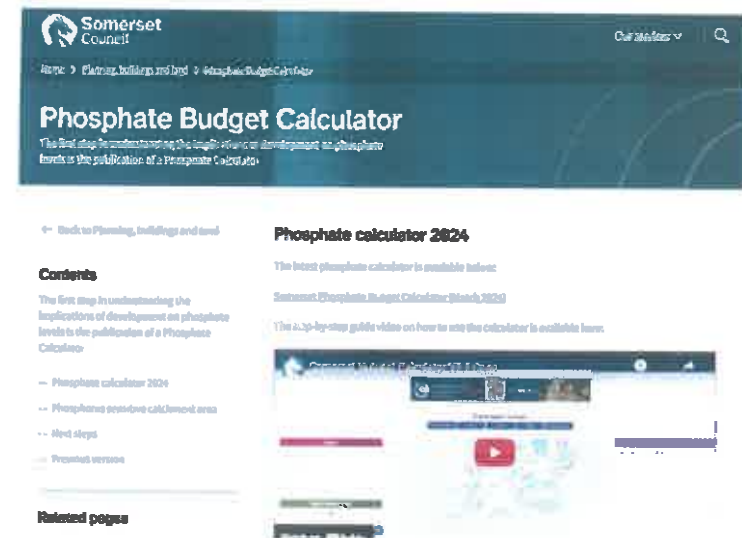
**Current Phosphate Runoff from
Agriculture (Cattle Grazing)
8Kg of Phosphates**

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

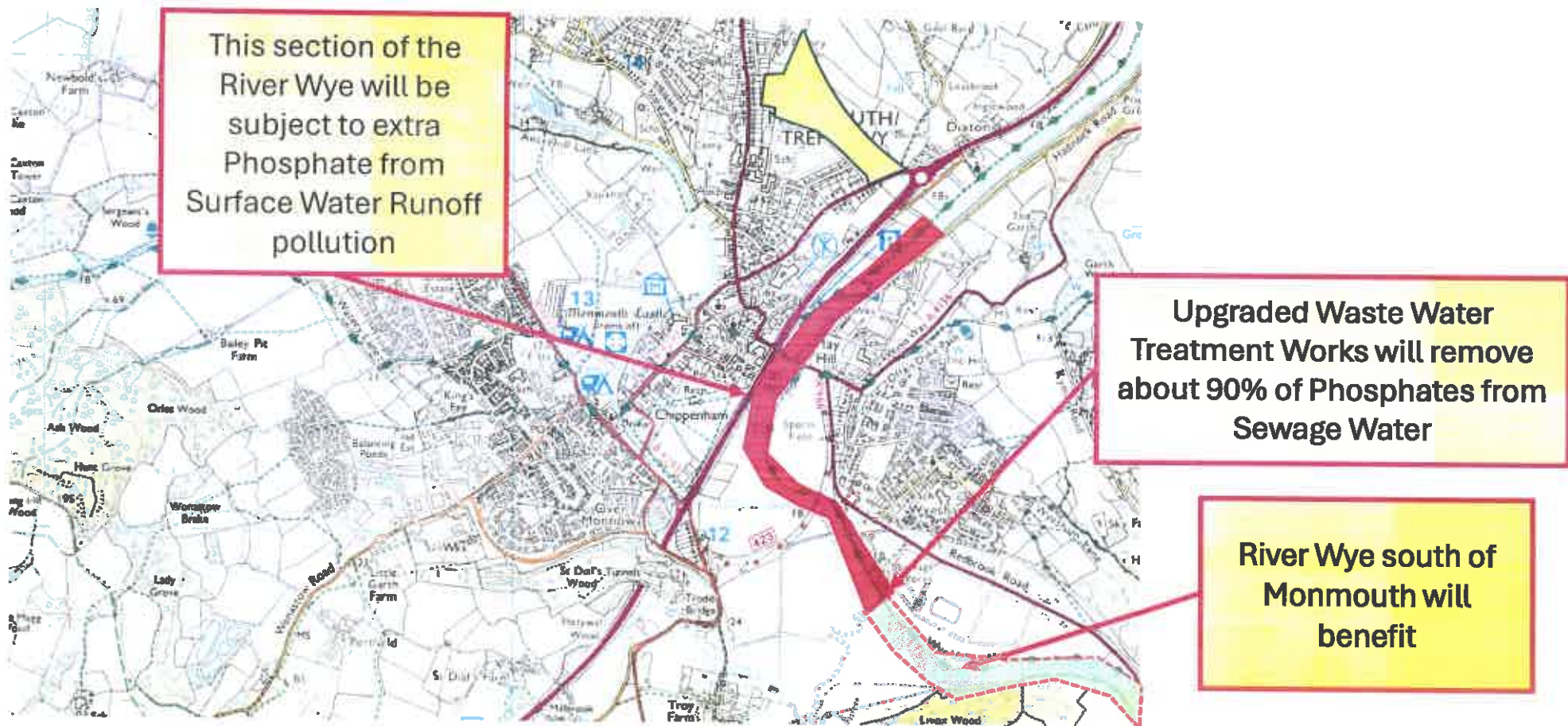
**Increased Phosphate Runoff entering the River Wye
= 16Kg – 8Kg = 8Kg of Extra Phosphates**

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

[Source: [Phosphate Budget Calculator \(somerset.gov.uk\)](https://somerset.gov.uk/phosphate-budget-calculator/)]



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



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

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

Average Phosphate Removal of 15% - 24%



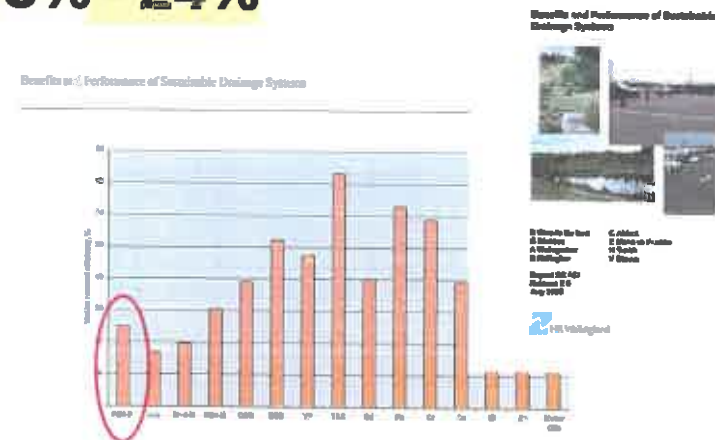
A Brunel University report looks at the effectiveness of SuDS

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

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

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

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



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

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

Will the ground accept water?

According to the **British Geological Survey**

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

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

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

HA4 Dixon Road Site
Soilscape 8
Clay Soil with
Impeded Drainage

CS0274 Wonastow Road Site
Soilscape 8
Loamy - Freely Draining
Floodplain Soils

[Source: Landis Soilscales Viewer -
<https://www.landis.org.uk/soilscales/>]

The HA4 Dixton Road Soil is Impermeable and Not Free Draining



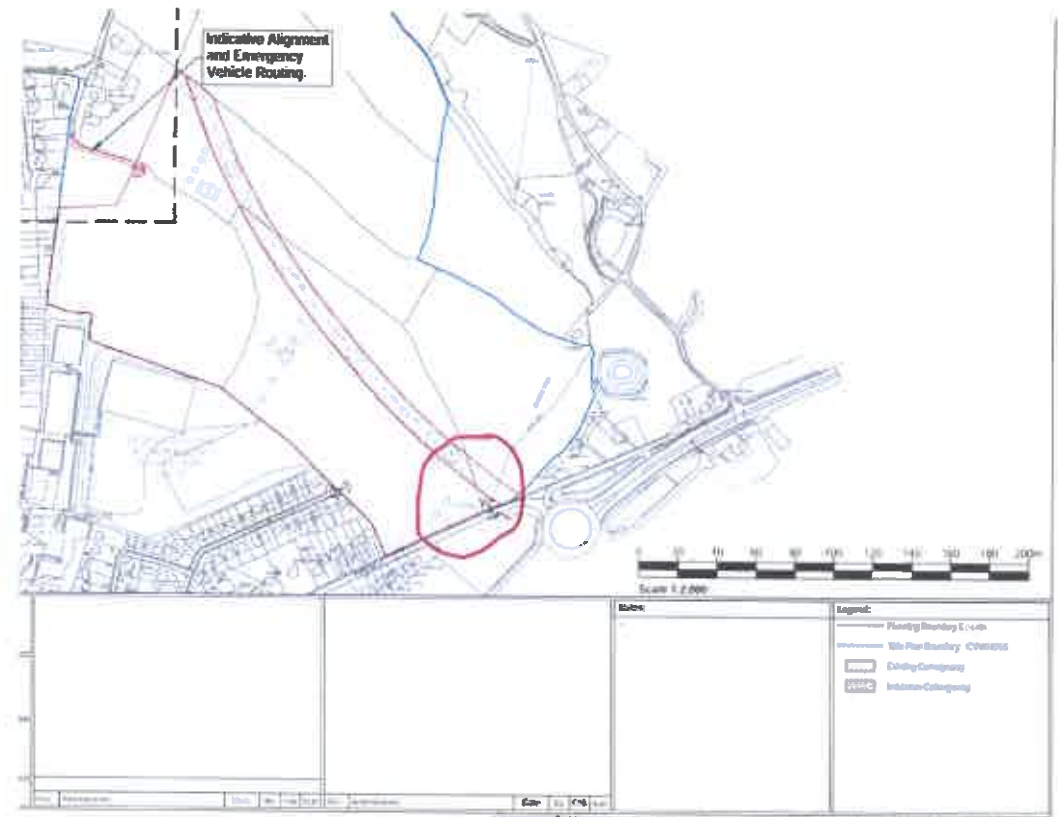
**Resident Photo taken Feb 2024 about 24 hours after heavy rain
Note the red clay colour of the runoff water**

One of the Proposed HA4 SuDS Ponds is in a Flood Zone

- SuDS are particularly ineffective if they are built in a Flood Zone.
- The Flood Zone is the South Part of the site.



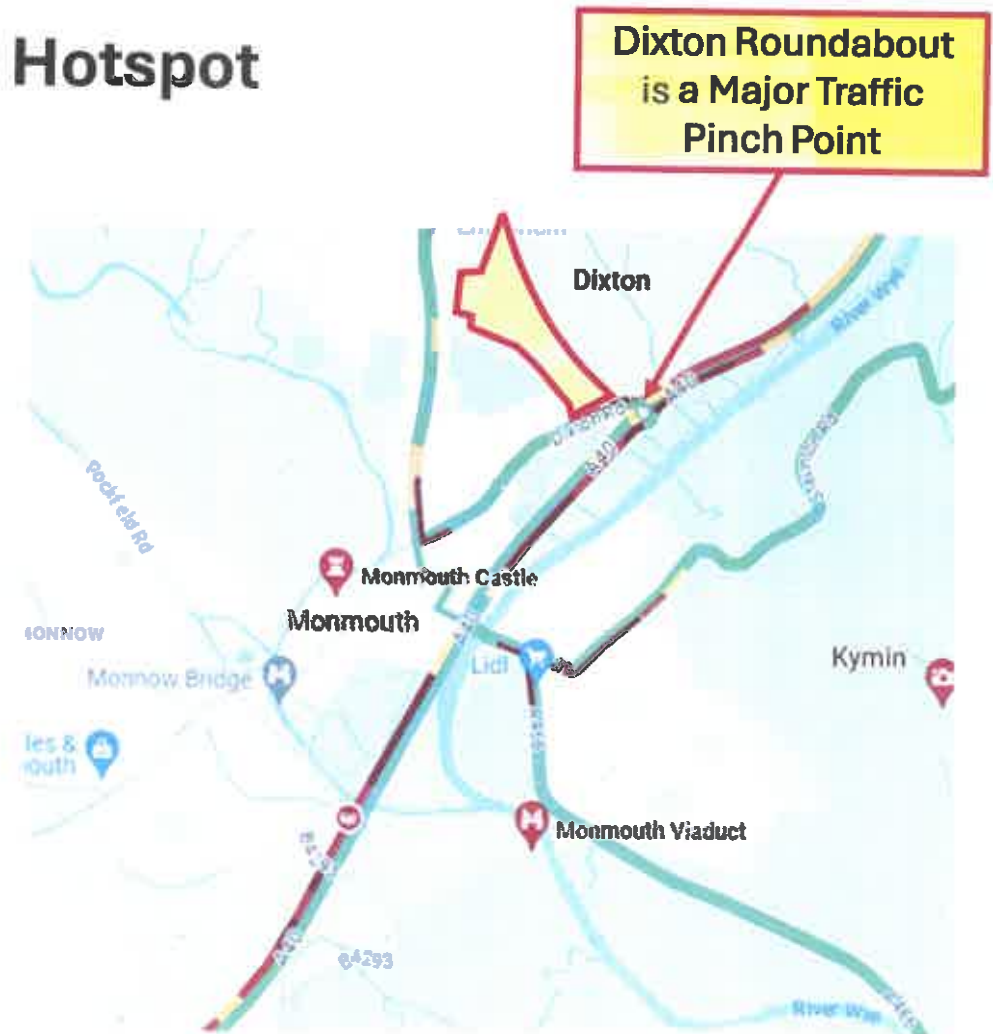
[Resident Photo 24 Nov 2024]



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

5. Traffic Congestion on Traffic Hotspot (Dixton Roundabout)

- The entrance to the candidate site (HA4 Dixton Road) is only 100 metres from the Dixton roundabout, which is a major pinch point for Monmouth. Monmouth already has very difficult traffic due to difficult geography
- 270 new houses would mean an increase of 405 vehicles entering the Dixton Road.
- Researchers for the Gateway to Wales Action Group have calculated that 270 households would increase the Motoring population of Monmouth 405 cars. This would add 362 more journeys onto the Dixton Road. This is in addition to the 4,490 vehicles per day already travelling on the Dixton Road and the 36,760 vehicles per day driving along the A40.
- A Simple journey from Monmouth to Wyesham (less than a mile) often takes 20 minutes or more. Our calculation shows that this could increase by 10 minutes during busy periods.
- Based on the average annual mileage, that would create an additional 476 tonnes of the greenhouse gas CO2 per year, as well as increasing the level of air pollution.



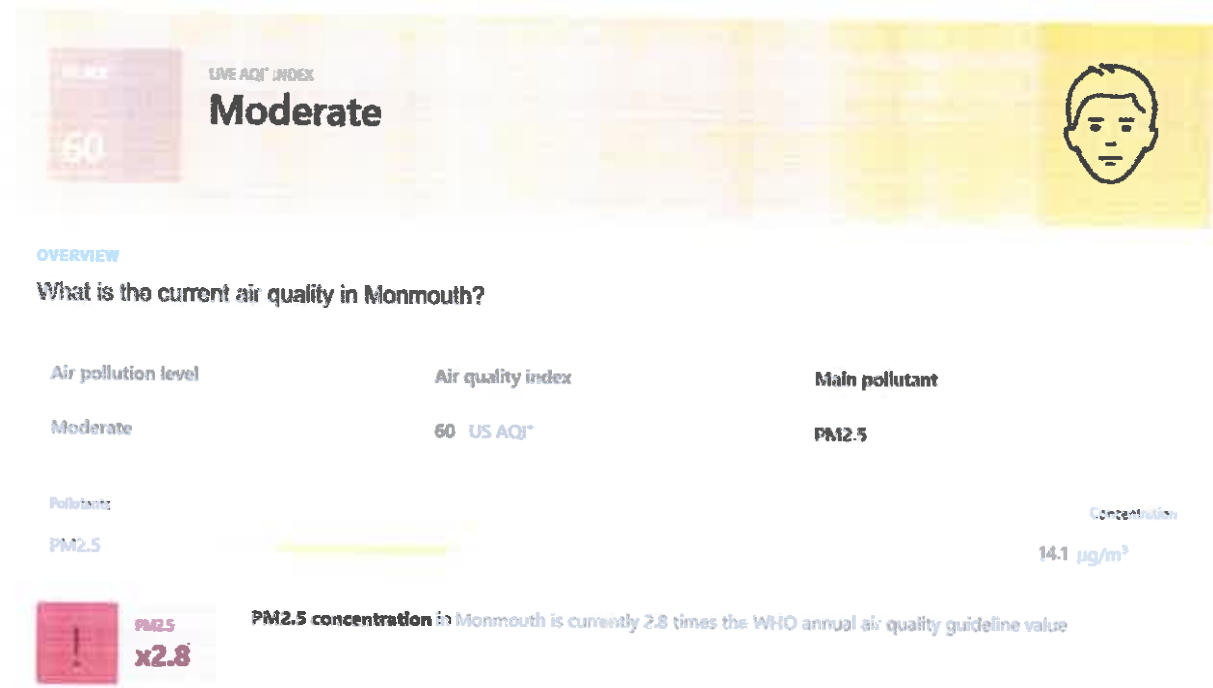
[9] Average of 1.5 Cars per household In Monmouthshire [(OC) Average number of cars per household, England & Wales, Census 2021 : r/dataisbeautiful (reddit.com)]

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

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

6. Air Pollution

- Monmouthshire County Council only monitor NO₂ levels. The nearest monitoring station MM13 Pike House, Dixon Road recorded average levels for 2022 of 24.4 µg/m³ (far in excess of the WHO guidelines of 10 µg/m³). PM_{2.5} and PM₁₀ particles are more dangerous and low levels of exposure can cause health problems.
- Why does the Council not Monitor the more dangerous PM_{2.5} and PM₁₀ particulate levels, particularly given the proximity of the Dixon Road development to Monmouth Comprehensive School?



PM_{2.5} Monitoring Station in Drybridge Street. Situated some distance from the A40/ A466 this regularly shows PM_{2.5} levels higher than WHO Guidelines.

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

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

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



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

8. Loss of habitat for Endangered Greater Horseshoe Bats

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

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

Building housing will

- Remove 20 football pitches of grazing land
 - Rip out established hedges
 - Add artificial light
 - Interrupt Bat Commuting Lines
- How can this possibly be a Biodiversity Net Gain?**

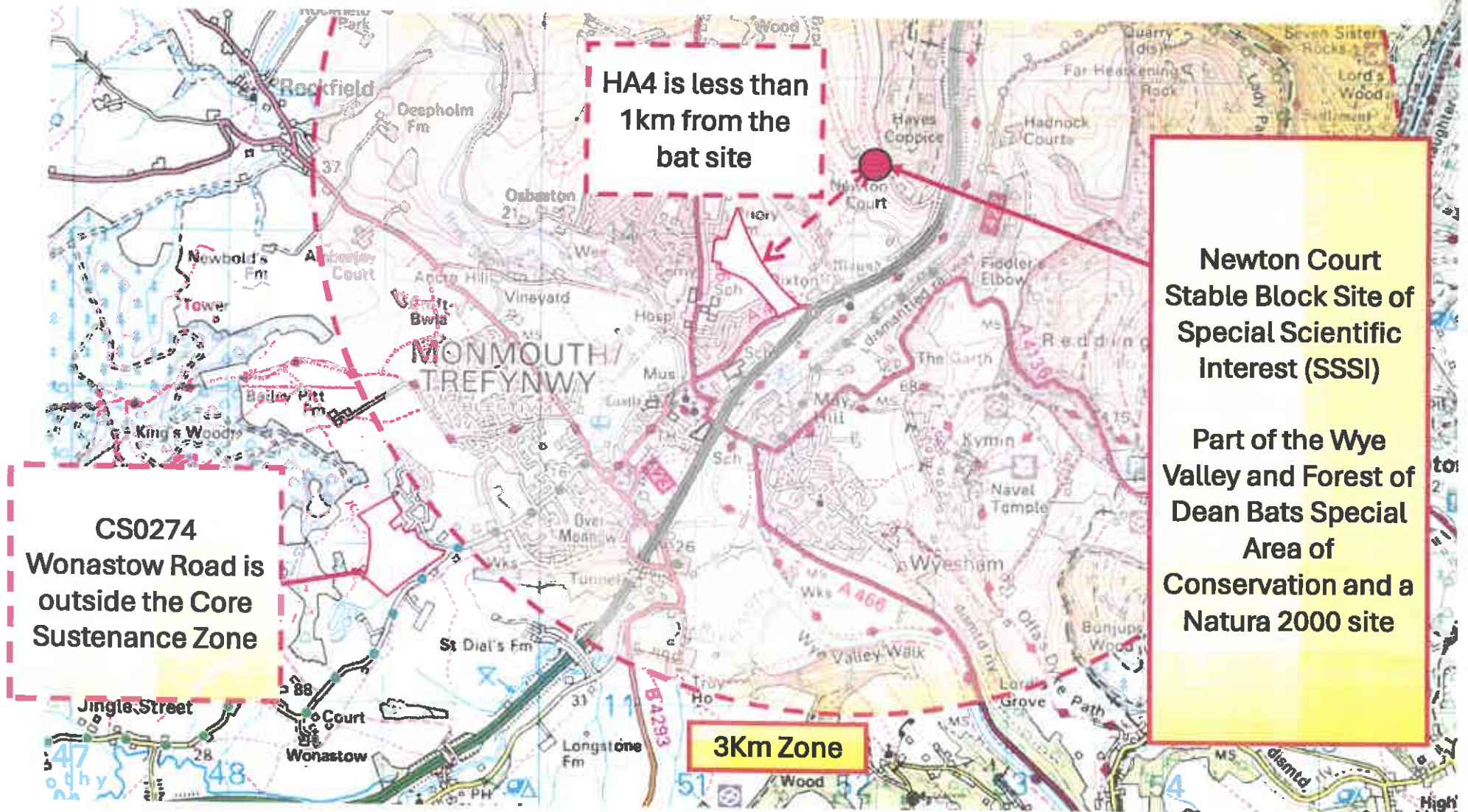
[Source [Site Improvement Plan: Wye Valley and Forest of Dean Bat Sites - SIP267](https://naturalengland.org.uk) (naturalengland.org.uk)]

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

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



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



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

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

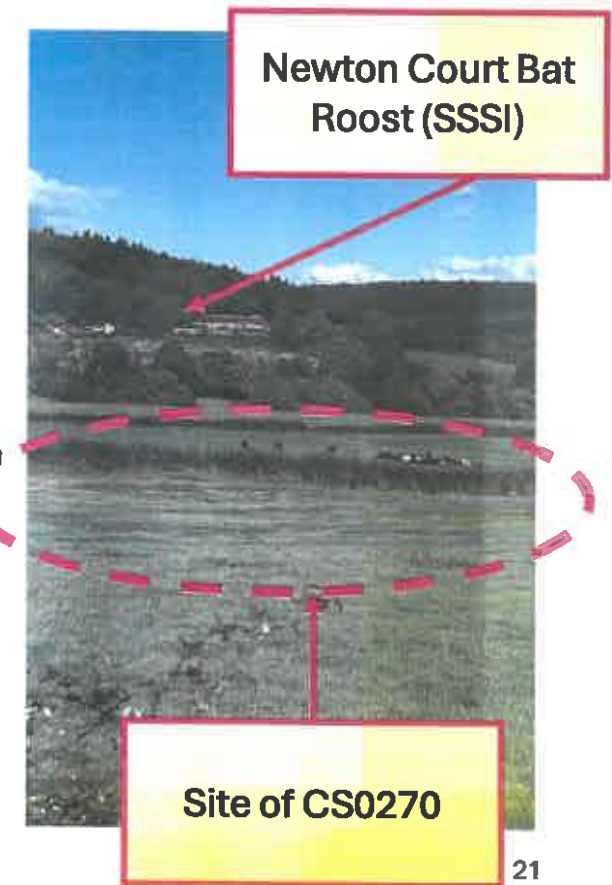
The development site is only 1km from the bat roosts.

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

“The effective conservation of the Greater horseshoe bat depends on the sensitive management of the farmed and forested landscape around maternity roosts and other sites used by the bats. Cumulatively, changes in agricultural management including: abandonment of grazing land; use of pesticides; hedgerow removal; can impact both horseshoe bat species”.

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

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



Monmouthshire Council has a legal obligation to protect biodiversity

The Environment (Wales) Act 2016

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

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

THE ENVIRONMENT (WALES) ACT 2016

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

BIODIVERSITY AND RESILIENCE OF ECOSYSTEMS DUTY

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



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

[Source: [Monmouthshire Local Nature Recovery Action Plan](#)]

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

- A “Setting” is an area outside of an AONB (a buffer zone) that impacts the AONB.
- Planning Policy Wales Says “Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas.”

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

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

Planning Policy Wales Edition 12

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

National Parks and Areas of Outstanding Natural Beauty



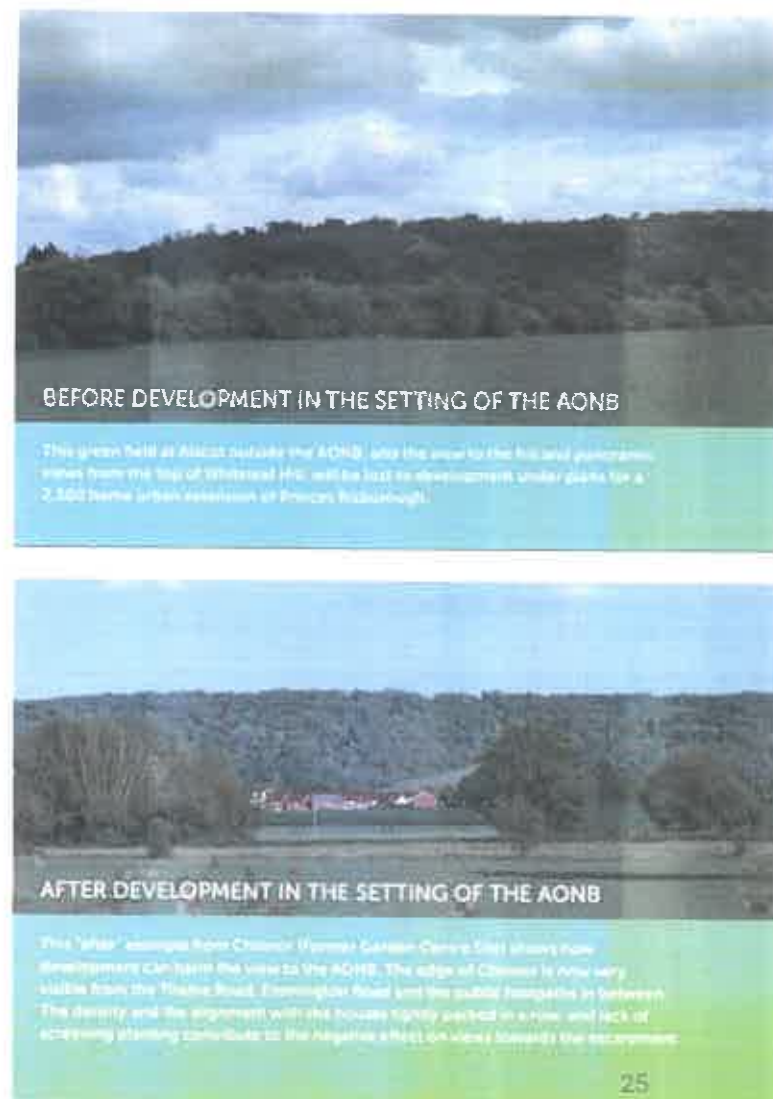
The statutory landscape designations that apply in Wales are National Parks, and AONBs. Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within,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

Example of an AONB Setting

- Chilterns AONB

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

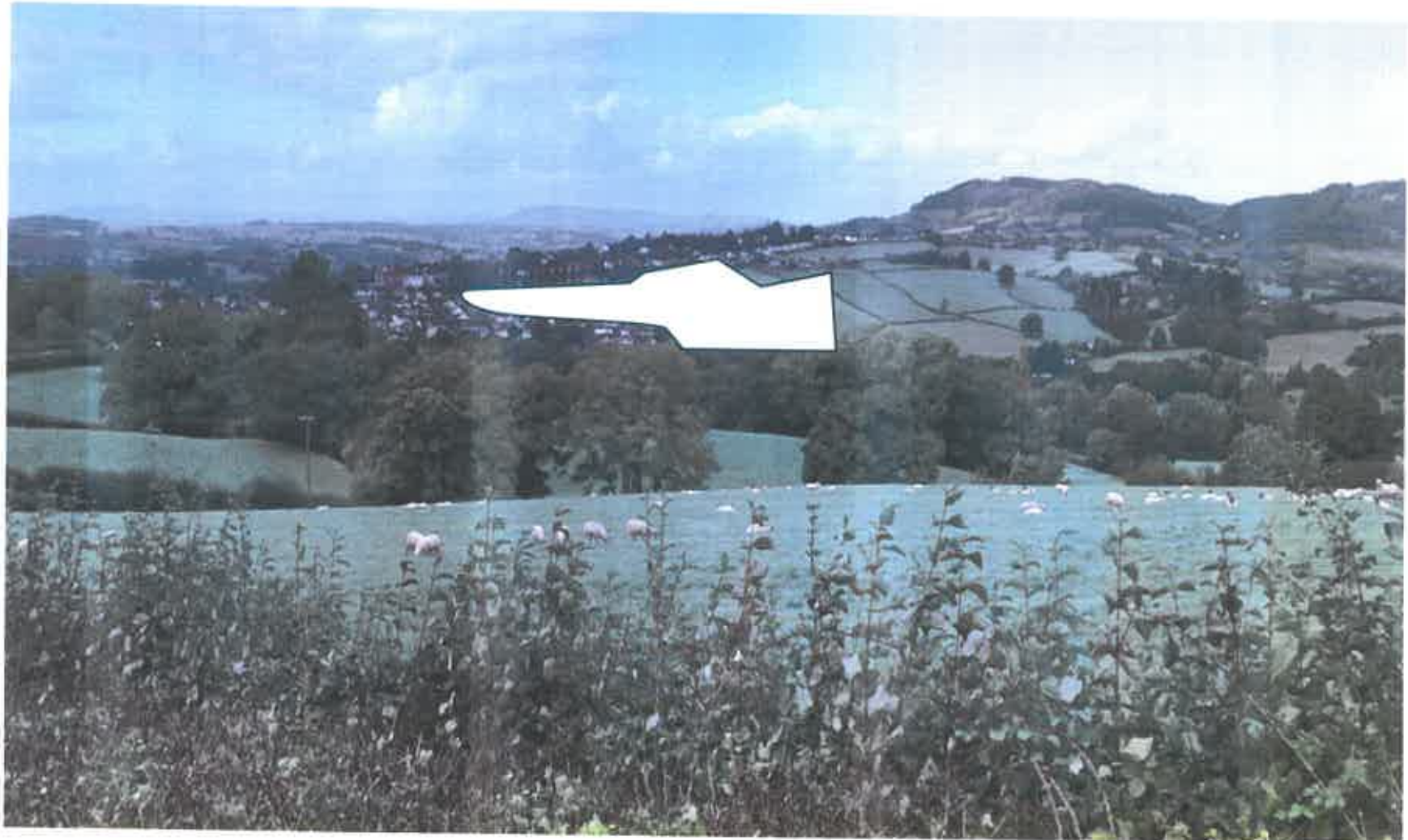
[Source: [2019-2024 Chilterns Management Plan DEVELOPMENT compressed.pdf](#)]



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



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



10. The HA4 Dixon Road site is within the “Setting” of a Scheduled Monument

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

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

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

Criteria

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

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

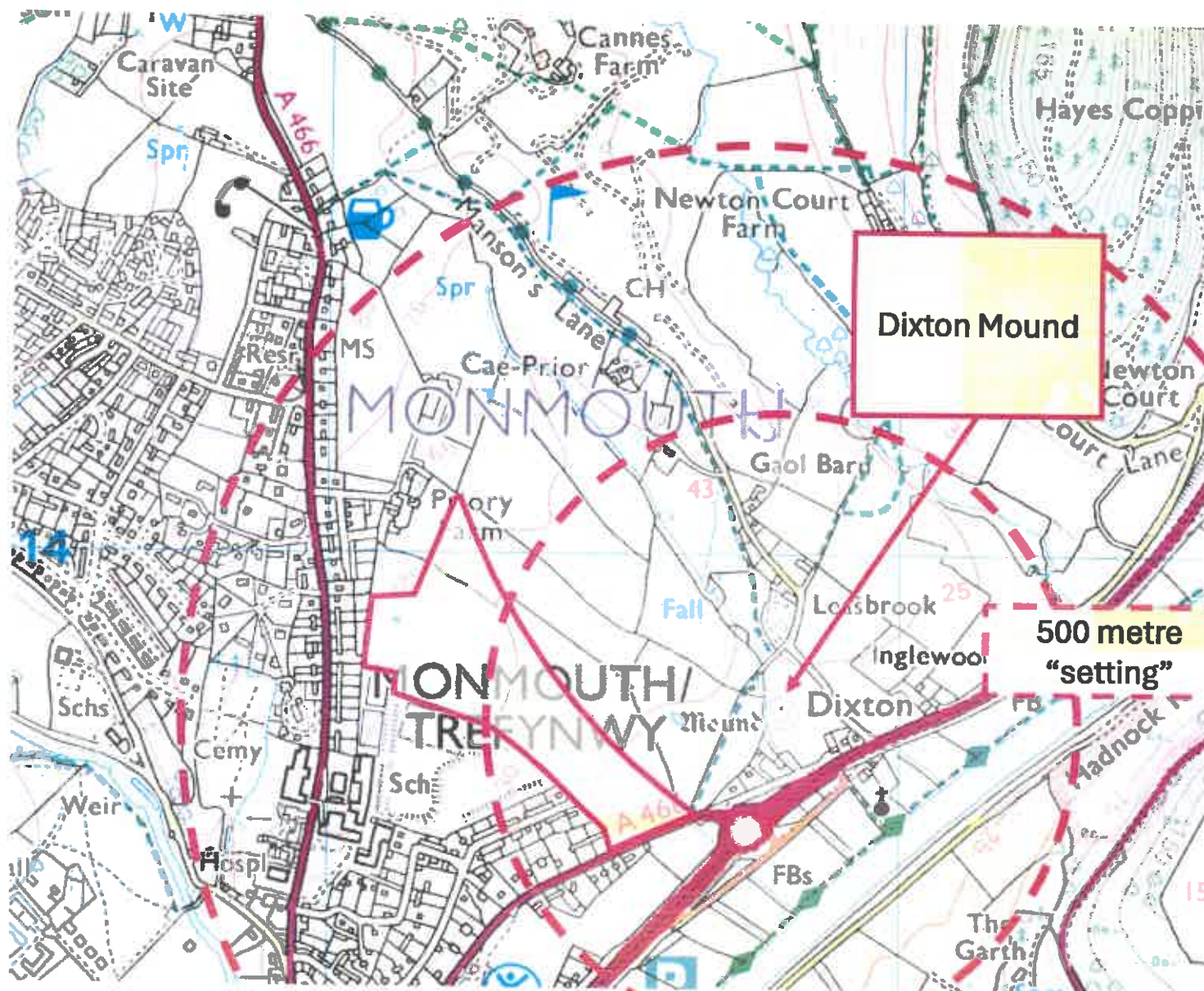
[2] Technical advice note (TAN) 24: the historic environment [<https://www.gov.wales/technical-advice-note-tan-24-historic-environment>]

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



Dixon Mound seen from the Hereford Road [1]
The field in the front of the picture is the development site

[Source:] [Wikipedia Photo](#)]



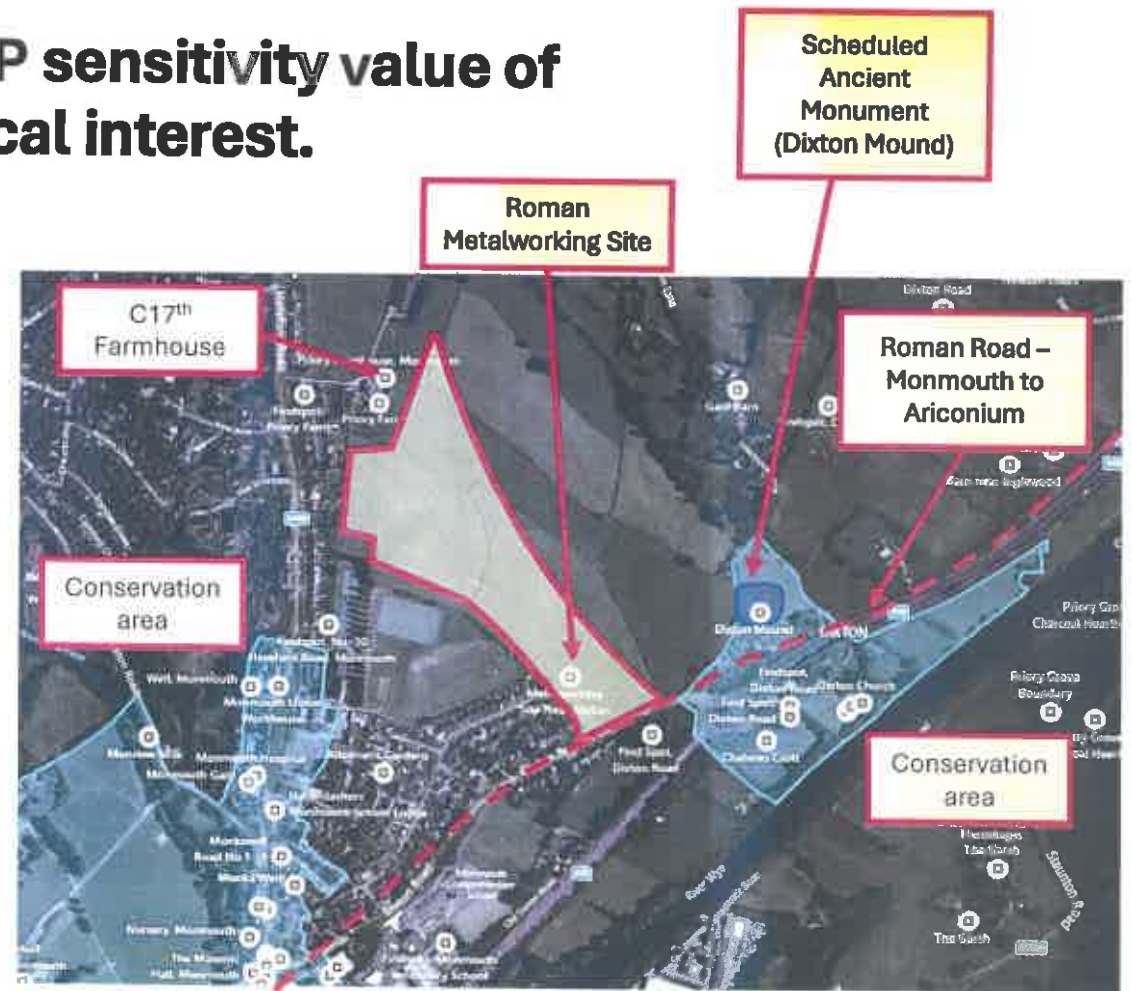
Dixon Mound is a Norman earthwork motte, founded by William fitz Osborn.

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

1000 metre "setting" for sites over xxx hectares

Historically Sensitive: The HA4 site has a LANDMAP sensitivity value of Outstanding/High for historical interest.

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



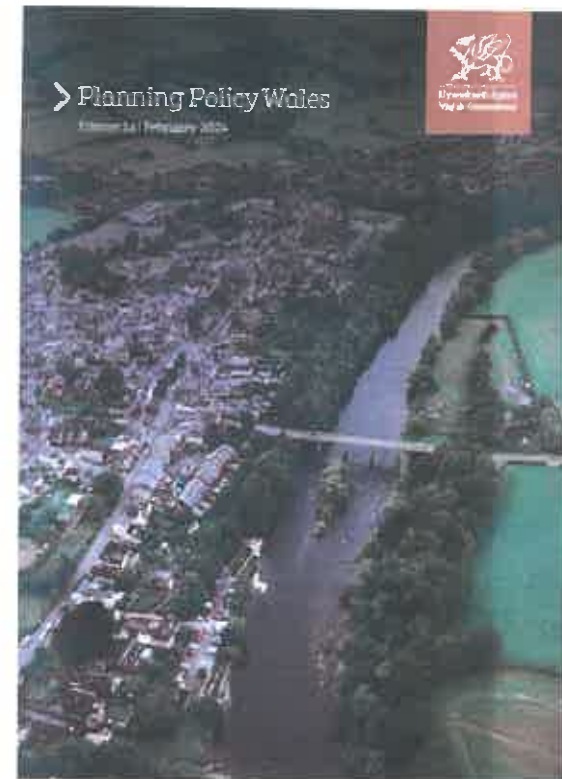
[Sources: Map <https://archwilio.org.uk/her/chi3/arch.php?county=Glamorgan%20Gwent%20Archaeological%20Trust&lang=eng>]
[Roman road – Monmouth – Ariconium Roman Road in South East Wales, Glamorgan – Gwent Archaeological Trust]

11. Loss of Prime Agricultural Land

Welsh Planning Rules State

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

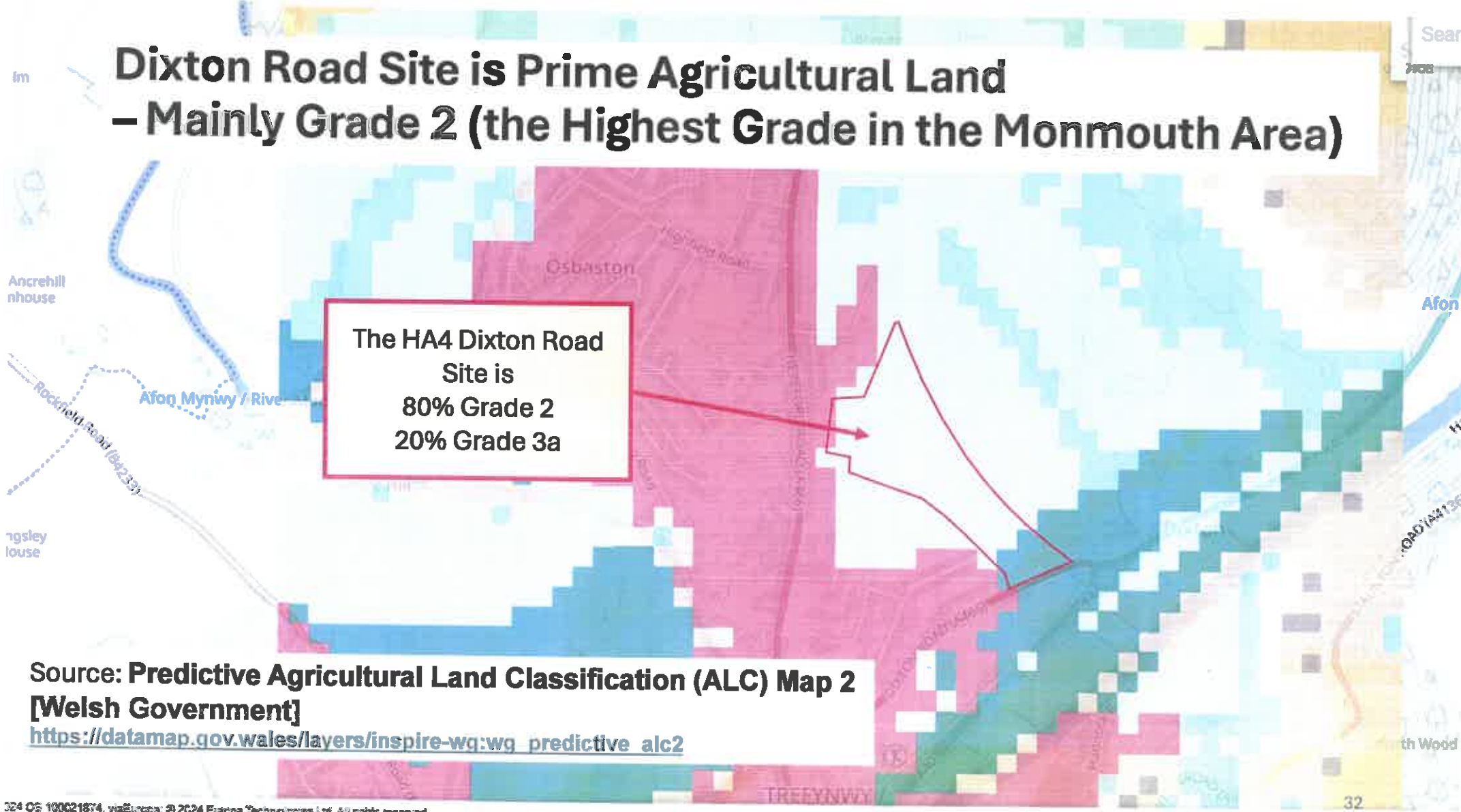
‘If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, **development should be directed to land of the lowest grade**’.



Planning Policy Wales – Edition 12

[Source: [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales)]

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



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

Source: **Predictive Agricultural Land Classification (ALC) Map 2**
[Welsh Government]

https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2

The map displays the CS0274 Site, outlined in red, situated in a rural area. The site is primarily composed of Lower Grade Agricultural Land, with 60% being Grade 3a, 35% Grade 2, and 5% Grade 3b. The surrounding area includes various land grades and features such as roads (Wonastow Road, Link Road, Afon Troc), water bodies (Afon Troc, River Monnow), and settlements (Over Monnow, Troy Cottage). A red arrow points from the site to a text box detailing its land grade composition. Another text box provides context from Planning Policy Wales, stating that development should be directed to land of the lowest grade.

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

Planning Policy Wales
 “development should be directed to land of the lowest grade”

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

**“development should be directed to
land of the lowest grade”**

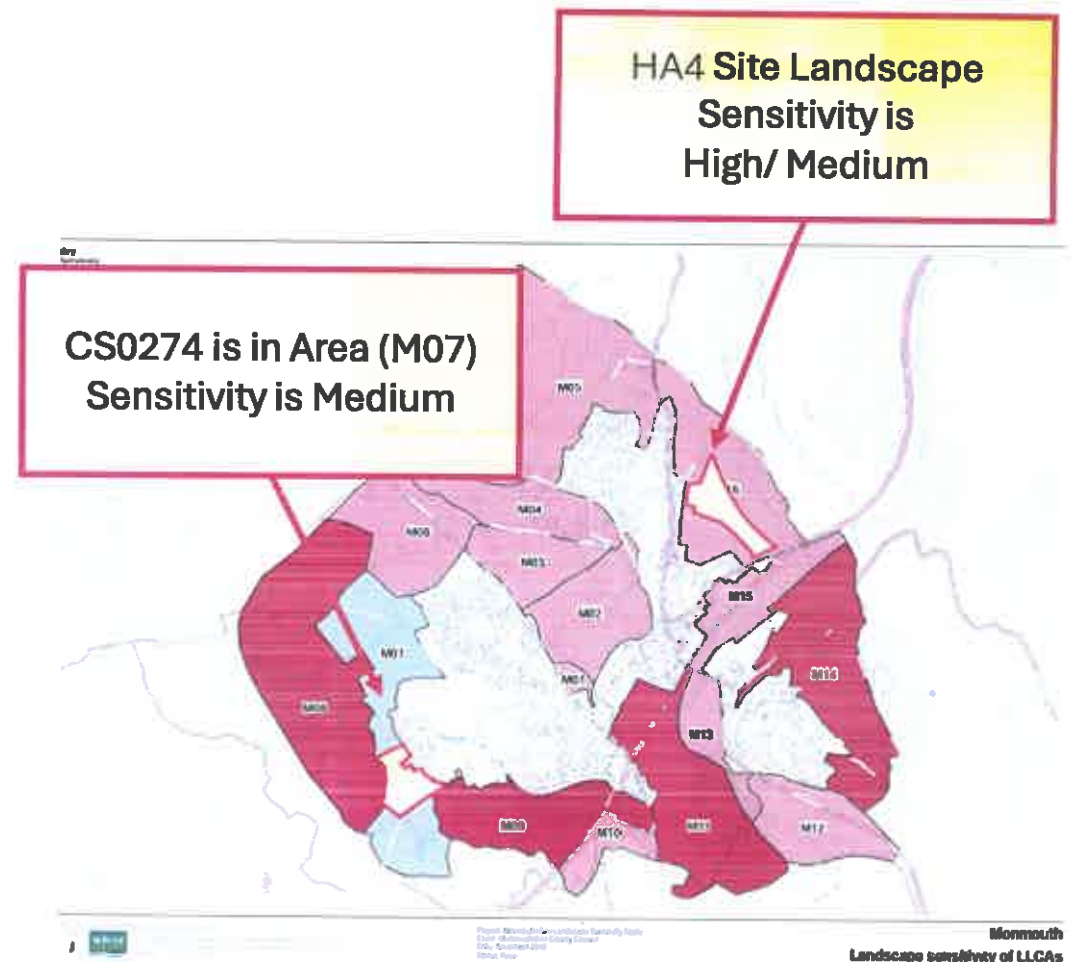
The CS0274 Site is
60% Grade 3a
35% Grade 2
5% Grade 3b

12. Landscape Sensitivity

Monmouthshire Council's Landscape Sensitivity report recommends

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

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



[Source: [Monmouthshire LLCAs](#).]

13. Flooding to Site Entrance

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

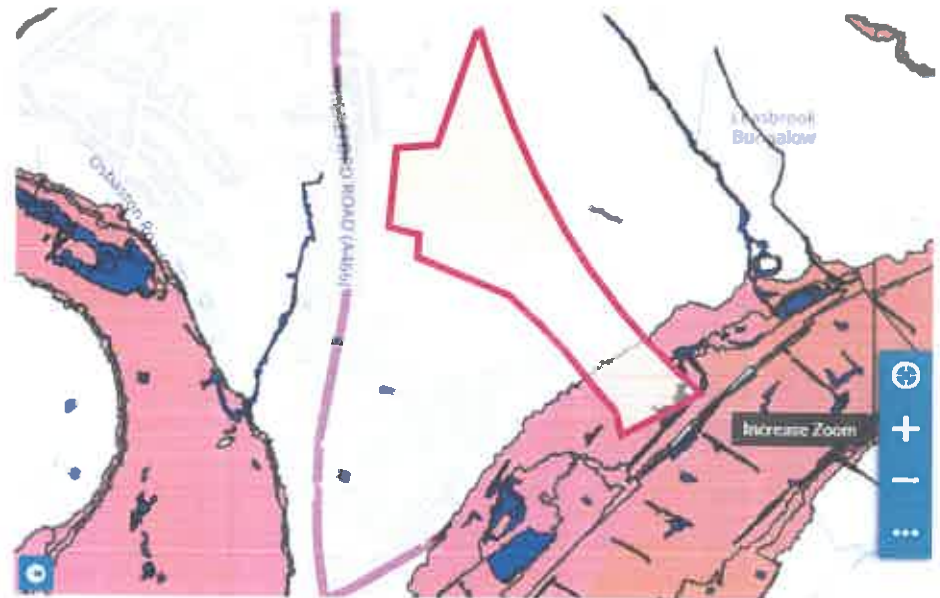


Resident Photo taken Feb 2024 about 24 hours after heavy rain
Note the red clay colour of the runoff water

[Home](#) / [Data Catalogue](#) / [Flood Risk Assessment Wales](#)

Flood Risk Assessment Wales

Natural Resources Wales



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

**Flooding could cause problems for
Emergency Services getting to the site**

The CS0274 Wonastow Road site has less flooding issues



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

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

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

[Source: <https://data.gov.wales/layergroups/inspire-nrw:FloodRiskAssessmentWales>]

Flooding at the HA4 Dixton Road Site Entrance

[Source: Resident Photos – 24 Nov 2024]



Other Objections

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

The CS0274 Wonastow Road site is a mixed use site for 175 houses

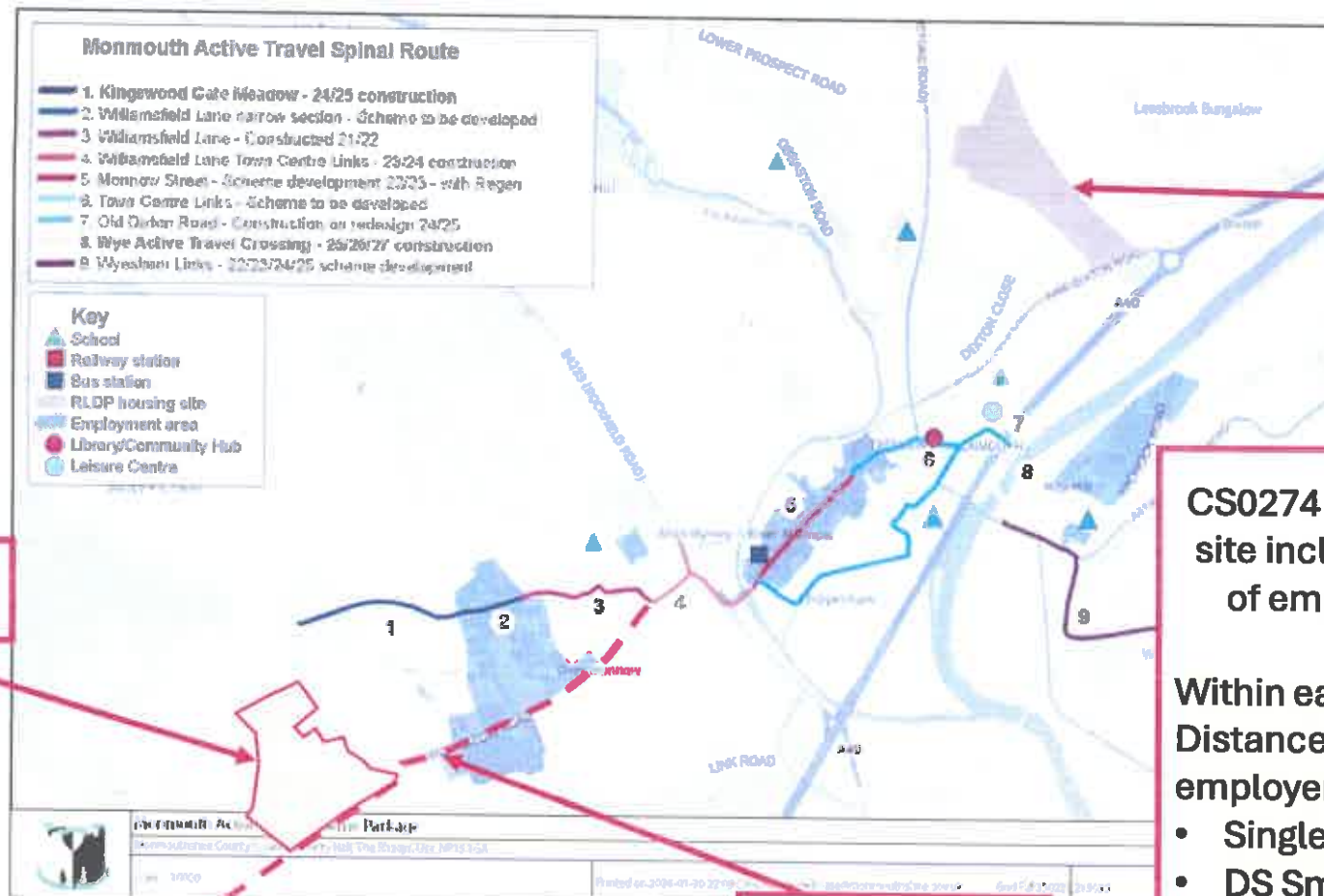


Within easy walking distance of major employers

- Siltbusters
- Triwall
- Singleton Court
- Mandarin Stone

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

The CS0274 Wonastow Road Site is better served by Active Travel



**HA4 Dixon
Road site is 2km
away from
nearest cycle
route**

**CS0274 Wonastow Road
site includes 2 hectares
of employment land**

Within easy Walking Distance of major employers

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

National Cycle Route 423

CS0274

CS0274 (Wonastow Road) is a More Suitable Site

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

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





Detailed written response to Monmouthshire County Council to the Deposit Plan (RLDP 2018-2033), including objections to the inclusion of site HA4 and our support for preferred site of CS0274. These responses follow the format (broadly) of the on line questionnaire

on the Deposit Plan

19 pages in total

References are made in response to question 10 to a very detailed separate response to the Deposit Plan

Jonty Pearce of 82 Hereford Road submitted 15.12.24

Gateway to Wales Action Group

Representing the interests of 400 local residents opposed to the development of site HA4

December 2024

Part 1 Contact details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Part 2 Our representation

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? **Objection**

One of the items of concern remaining on the RLDP is that Welsh Government's (WG) response put before the Place Scrutiny Committee on 28th September 2023 and Full Council on 26th October 2023 was dated January 2023. This response must therefore have been to the December 2022 RLDP, not the September 2023 and latest version. It seems therefore that there has been no response to the September 2023 RLDP on which the Deposit Plan is based, from WG. **There has been no response to repeated attempts to MCC from our Action Group to provide evidence of a response from WG to the September 2023 , which forms the basis of this Deposit Plan .** Without WG's endorsement then how can the Inspector judge initially the legitimacy of the plan?

Throughout the process of the RLDP over the last few years the Welsh Government has been clear that it wants houses to be built close to the M4 corridor near to cities like Newport and Cardiff and not in Monmouthshire.

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement

Local Development Plan (RLDP) dated September 2024 in 5.1.1 states

Level of growth in Monmouthshire

Option 1: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.

- Option 2: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.

- Option 3: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs. This is what the Welsh Government want and if adopted site HA4 would not need to be developed.

Location of growth. Our Group consider Option 3 should have been adopted

- Option 3: Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.

The whole approach is around the need for affordable housing. If you need affordable housing, then build affordable housing only and allocate sites for Housing Associations. This 50% affordable housing is not sustainable for the developer.

Barratt Developments took over Redrow Homes on 22nd August 2024. Subsequent to that purchase, on 28th August, Philip Barnes, Group Land Director at Barratt Developments, warned that the affordable housing policy would deter developers from building on green belt land.

He said that “Barratt has pulled three "in-flight" planning applications being prepared on draft allocated sites "because the spectre of 50% renders the scheme unviable due to the unacceptably reduced (or removed) land value for the landowner". For full quote see <https://www.localgovernmentlawyer.co.uk/planning/401-planning-news/58403-developer-pulls-applications-over-spectre-of-50-affordable-housing-proposal>

Welsh Water have said that the sewers close to site HA4 are unlikely to have capacity and an HMA is needed. There is a real likelihood that new sewers may need to be expensed by the developer at a cost of several million pounds. In this case the 50% affordable housing will not be able to happen.

2.Do you have any comments on the Plan’s Growth Strategy. Policy S1

Is your representation in support or objection? **Objection**

Question 2, Policy S1.

The objective to create 6210 new homes is remarkably close to the objective to create 6240 jobs. Creating new homes can create new jobs in construction, but house builders will use their own workforce so new local jobs will not be created.

In the first 5 years of the RLDP the county lost 1000 jobs. Research by commercial estate agents Avison Young Cardiff report (January 2024) forecasts only 2.4% average total growth for Wales in the workforce over the next five years. Cardiff will have the highest growth over the next 5 years of 3.6%. . Lichfield’s report on Economic Growth forecast for the period of minus 100 jobs from 2022 to 2042. To realise the jobs target of the RLDP would require jobs growth of 21% for the county for the period 2023 to 2033; a totally unrealistic figure!

Currently the number of people in the county aged over 65yrs represents 25.9% of the population. Taking demographic data from the housing waiting list for Monmouth and the likely ages of those purchasing private properties our research suggests that the

demographics could only be changed to 21.9% over 65yrs; a fairly small change . (RLDP ref 6.36 to 6.3.8)

We can find no evidence that high levels of out commuting will not continue in the county (RLDP ref: 6.3.13) particularly for those who purchase private properties in the Preferred Strategy sites . A recent study of job prospects in Monmouth on website Linked In revealed just 12 jobs available at between £12 and £15 per hour. This level of income is far too low to cover mortgage payments on the private housing proposed.

Creating B class use employment land does not mean that employers will move in to an area (RLDP 6.3.14) . Evidence in Monmouth for the existing major employers (except Siltbuster) pay close to the minimum wage, so younger people will not be attracted to move here .

In RLDP 6.3.15 jobs growth is suggested in the sectors of tourism, leisure, food, retail and agriculture. There is ample evidence that both tourism and retail are on the decline and other jobs would again be at close to the minimum wage.

RLDP should be amended to show negligible jobs growth and reflect this in the number of houses to be built. This would reduce the amount of out migration to work which would occur if more homes were built under the Preferred Strategy site HA4,

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? **Objection**

RLDP say "6.4.4 The spatial strategy and identification of suitable sites for allocation in the RLDP reflect the site search sequence outlined in national planning policy. In determining whether or not to allocate particular sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. For reasons outlined in Part 6 we consider that site HA4 fails on the all the criteria above in bold print.

RLDP says in "6.4.7 In accordance with the PPW12's site search sequence, development proposals are expected to make full and appropriate use of land, with preference given to the development of previously developed land"

A Freedom of Information request response from September 2023 indicates that MCC does not keep a record of brownfield sites so is unable to give preference to these sites.

RLDP says in" 6.4.7For example, all of our settlements are surrounded by agricultural land with a high-level classification as best and most versatile land. Rather, the Deposit Plan allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites.

Site HA4 is the worst connected Preferred Strategy Site in the county and has far higher agricultural value than sites, such as CS0274.

We consider that HA4 site is not suitable for the reasons noted above. If a site for Monmouth must be chosen, then CS0274 should be substituted as it has far fewer issues.

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

Is your representation in support or objection? **Objection**

RLDP Policy OC1 states “7.1.1 It is essential, therefore, that any such development is not at the expense of environmental considerations, including landscape, biodiversity, local amenity and historic, cultural or geological heritage”

Site HA4 fails to take into account all of the above considerations in bold for reasons explained in Appendix.

After 7.2.3 Policy GW1 Green Wedge Designations does not include Monmouth. If it is not included how can environmental considerations be adequately taken into account for site HA4 ? Therefore, it should be removed from the RLDP.

There is a Green Wedge around the Brecon Beacons National Park. But there is no Green Wedge around the Wye Valley National Landscape (AONB). In law a National Park and an AONB enjoy the same level of protection. So, there should be a green wedge around the AONB to cover the Landscape Setting.

5.Do you have any comments on the design and sustainability placemaking policies? S3, PM1,PM2,PM3,HE1, HE2 and HE3

Is your representation in support or objection? **Objection**

Policy S3 (ii) Candidate Site HA4 Creates the need to travel to shop or work.

Policy S3 (iii) HA4 development will not respect the local environment and will detract from the Wye Valley Landscape (AONB)

PM1 Choice of site HA4 offends all the principles of this policy. In particular, 8.3.1 HA4 will increase harm due to pollution of air, light, noise and water pollution.

PM2 Comments as for PM1.

For a more comprehensive response to the policies above and others please see our response to Question 10 regarding site HA4

6.Do you have any comments on the climate change and renewable energy policies. S4, NZ1, CC1 , CC2 and CC3 .

Is your representation in support or objection? **Objection**

Strategic Policy S4 – Climate Change states

(iv) Utilising sustainable construction techniques and local supplies through the adoption of the circular economy principles, where possible.

v) Incorporating water efficiency measures and minimising adverse impacts on water resources and quality.

vi) Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel.

In the case of Preferred Strategy Site HA4 development of this site will not conform to points (iv) to (vi) above. There is no evidence that developer Redrow Homes will buy local (iv) . There will be an increase in phosphates entering the river (double the existing farming use's discharges). River water quality will be adversely affected from pollutants including phosphates.

9.2.2 States "In a Monmouthshire context 'Net Zero Carbon' is defined as being a home that seeks to balance its 'essential' operational running costs (regulated energy) from renewable energy sources whilst ensuring the building fabric is to the highest standard (performance rating A)" Redrow homes website clearly states that they will not meet zero carbon emission housing until 2050, not by the end of the RLDP in 2033.

We cannot find mention of Policy NZ1 in this section of the RLDP

Policies CC1, CC2 & CC3 have noble objectives but as to whether they are achievable is outside the scope of this report

Site HA4 should be removed from the Deposit Plan

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

Is your representation in support or objection? **Objection**

10.1.3 states that The Environment (Wales) Act 2016 introduced an enhanced Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) on public authorities in Wales. This places a duty on Council to seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

Site HA4 clearly adversely affects the Sustenance Zone of 3km required for the Greater Horseshoe Bats in the SSI of Newton Court. Also, the local population of dung beetles, a food for the bats, will be adversely affected by the change from Prime Farmland to residential development.

Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery

ii)Landscape setting and quality of place, by identifying, assessing, protecting and enhancing the natural and distinctive landscape, historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character.

iii) Biodiversity and resilient ecosystems by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them.

v) Local food production; and

vi) Flood attenuation and water resource management.

Site HA4 clearly adversely affects the distinctive landscape (see ii) above) of the Wye Valley AONB ; a view that has not changed since the Wye Tour of 1780

Site HA4 reduces biodiversity by adversely affecting the foraging sources for the Greater Horseshoe bats of Newton Court. see iii) above

Site HA4 will reduce local food production see v) above, by the change of use from Prime Farmland to residential development.

Site HA4 will adversely affect water resource management see vi) above; by the increase in phosphates caused by the development of the site for housing ,

Policy GI2 – Trees, Woodland and Hedgerows

Development proposals that would adversely impact on trees, woodland and hedgerows that are either a public amenity, of cultural heritage, provide important ecosystem services, are protected, or significantly contribute to GI connectivity will not be permitted.

Site HA4 development will adversely affect GI connectivity

Policy LC1 – Landscape Character

Development proposals that would impact upon landscape character, as defined by LANDMAP, must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection.

Development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects by:

a) Causing significant visual intrusion.

33 LANDMAP is a GIS based landscape resource developed by NRW where landscape characteristics, qualities and influences on the landscape are recorded and evaluated in a nationally consistent data set.

Green Infrastructure, Landscape & Nature Recovery 77

b) Causing significant adverse change in the character of the built or natural landscape;

c) Being insensitively and unsympathetically sited within the landscape.

d) Introducing or intensifying a use which is incompatible with its location.

e) Failing to harmonise with, or enhance the landform and landscape.

f) Losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes of both the built and natural environment; and /or

g) Respecting dark skies.

Site HA4 fails all of the above conditions from a) to g) . Refer to Jonty's work on Landmap

Policy LC4 – Wye Valley National Landscape (AONB)

Within the Wye Valley National Landscape (AONB), any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. In considering development proposals regard will be given to:

a) The long-term effect of the proposal, and the degree to which its nature and intensity is compatible with the character, purpose and overall management of the National Landscape (AONB);

b) The degree to which design, quality and use of appropriate materials harmonise with the surrounding landscape and built heritage.

c) The extent of the landscaping proposed.

d) The need to protect features in the landscape identified as important through

LANDMAP;

e) The extent to which a proposed new building or use will generate additional traffic and the requirement for improvement of existing roads and lanes, including the surfacing of green lanes.

f) The impact of the proposed development upon nature conservation interests.

Development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted. Site HA4 is outside but its development would detract from the character and setting of the AONB.

8. Do you have any comments on the infrastructure policies? S6 and IN1

Is your representation in support or objection? **Objection**

Strategic Policy S6 – Infrastructure

11.1.2 Infrastructure covers a range of services and facilities provided by public and private bodies and includes:

- Physical infrastructure such as transport facilities and related infrastructure (such as footpaths, cycleways), water provision and treatment, sewerage, flood prevention and drainage, waste disposal, power generation and supply, including renewables, digital infrastructure and telecommunications.
- Infrastructure such as schools, healthcare, transport services (including public transport), community buildings, community recycling facilities, sport and recreation facilities, open space, etc.
- Green and Blue Infrastructure (as detailed in Strategic Policy S5) such as woodlands, hedgerows, ponds, green spaces, designed sustainable drainage systems and trees.

Site HA4 does not meet the requirements of 11.1.2 above and Policy S6 for the following reasons:

- It is not practical to install an Active Travel Route to the town centre due to multiple road crossings.
- Sewage treatment is at 100% capacity and Welsh water has not demonstrated its ability to cope with more sewage treatment

- Drinking water quality which is already poor will be adversely affected by run off from the proposed site which will enter the river Wye just upstream of the drinking water extraction point.
- Public transport in Monmouth is acknowledged to be the worst in the county for a primary settlement. There is no rail station and no access to long distance coach travel. Travel by bus to Newport, Hereford and the Forest of Dean is very slow and affects employee's ability to travel to work or for students to access colleges providing vocational qualifications.
- Because of the amount of social housing required S106 contribution from the developer are likely to be small and have an insignificant effect on improving infrastructure. In any event improving the service from TfW will be virtually impossible.

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,H&,H8,H9 & GT1

Is your representation in support or objection ? **Objection**

12.5 New Housing in the Open Countryside

12.5.1 In accordance with PPW12, the RLDP seeks to strictly control and reduce the environmental impact of new dwellings in the open countryside of Monmouthshire. The RLDP defines 'open countryside' as those parts of the plan area lying outside defined Primary, Secondary and Main

Rural Settlement Boundaries or the physical boundaries of Minor Rural Settlements. New build dwellings in the open countryside will not be permitted unless justified by the types of developments noted in Policy S2 and OC1.

Site HA4 is located in the open countryside and is prime farmland

13.1.3 The Local Housing Market Assessment Refresh 2022 - 2037 (LHMA)³⁶ (May 2024) estimates a net need of 453 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027).

13.1.6 Only around 4% of those on the social housing waiting list seek shared equity properties not 17% proposed . Starting to develop a site with the wrong parameters is likely to lead to issues with developers .

13.1.10 Strategic Policy S7 provides detail of the thresholds at which affordable housing will be required. A High-Level Affordable Housing Viability Study has been undertaken as part of the RLDP evidence base, this demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more.

**There is no example in Wales of this level of social housing being achieved .
Feedback from local developers and architects suggest that only 10% is achievable .
Just merely wishing for 50% does not make it achievable ,**

Brownfield Sites

13.1.15 The majority of the financial viability assessments that have been undertaken for housing allocations in the RLDP relate to greenfield sites as does the evidence from the high-level assessments used to inform the policy approach for windfall sites.

In the response to a freedom of information request of September 2023 MCC indicated that they kept no record of brownfield sites so cannot have assessed if any were suitable for housing development.

10. Do you have any comments on the residential site allocations? Policies S8, HA1 to HA18.

Is your representation in support or objection? **Objection**

For a more in depth analysis of the many issues affecting site HA4 and an illustration of the advantages of CS0274 over HA4 , please see the separate submission by Jonty Pearce.

Our Objections to the Dixon Road, Monmouth site fall into three categories

- **Water Quality and Pollution**
- **Traffic Congestion**
- **Environmental Sensitivity**

Water Quality and Pollution

1. **Drinking Water Contamination.** Monmouth derives its drinking water from the River Wye. The River Wye in Monmouth is in a Special Area of Concern for Phosphates. It is also under two notices from the Drinking Water Inspectorate, that says there is a potential risk to human health. One of the notices is for Cryptosporidium, a nasty tummy bug that is chlorine resistant. The Drinking Water Inspector has mandated two upgrades to Monmouth (Mayhill) Welsh Water Treatment Works. These upgrades are not due to be completed until March 2028, and following a period of Monitoring will not be signed off -by the Drinking Water Inspector until March 2030.
2. **Surface Run-off Pollution.** Any surface run-off pollution from the site, during periods of heavy rain (not uncommon in Wales), would flow into the brook network and into the River Wye around 400 metres upstream from where Monmouth gets its drinking water.
3. **Raising Phosphate Levels in the River Wye.** The rainwater runoff pollution from the site would generate extra Phosphate pollution in the River Wye through Monmouth. We have used a phosphate calculator to show that the site would generate an extra 8Kg of Phosphate runoff per year compared with agricultural grazing use. The planned upgrade to Monmouth's Waste Water Treatment works (a key reason why Monmouthshire Council is promoting development in a Special Area of Concern for Phosphates) would only improve phosphate levels downstream of Monmouth town.
4. **Sustainable Drainage Solutions (SuDS) not effective on Phosphates.**
The developer has proposed a Sustainable Drainage Solution (SuDS) to deal with runoff pollution. The problem is that while SuDS can be useful for nitrates, is not very effective

at dealing with phosphates. Evidence shows that only 15 to 24% of Phosphates are removed from a SuDS solution. The British Geological Survey has also highlighted that “For infiltration-based SuDS to drain effectively, the topsoil and the underlying geology need to be free draining”. According to the Soilscape database the Dixon Road site is Clay Soil with impeded drainage (Soilscape 8). The alternative site at Wonastow Road is more suitable for SuDS, as the soil type is Soilscape 12 (Freely draining floodplain soils).

Traffic Sensitivity

5. **Traffic Congestion.** The entrance to the Dixon Road site (HA4) is only 100 metres from the Dixon roundabout, which is a major pinch point for Monmouth.

270 new houses would mean an increase of 405 vehicles and an extra 362 journeys per day on the Dixon Road. This is in addition to the 4,490 vehicles per day already travelling on the Dixon Road and the 36,760 vehicles per day driving along the A40. A Simple journey from Monmouth to Wyesham (less than a mile) often takes 20 minutes. Our calculations show that this could increase by up to 5 to 10 minutes during busy periods.

Based on the average annual mileage, 405 vehicles would create an extra 476 tonnes of the greenhouse gas CO₂ per year, as well as increasing the level of air pollution.

6. **Air Pollution.** Locating an additional 405 cars next to a heavily congested A40 Dixon Roundabout can only increase air pollution. Currently Monmouthshire County Council does not monitor levels of the dangerous air pollutant PM_{2.5} It only monitors NO₂ levels. The nearest monitoring station MM13 Pike House, Dixon Road recorded average NO levels for 2022 of 24.4 µg/m³ (far in excess of the WHO guidelines of 10 µg/m³). Why does the Council not Monitor the more dangerous PM_{2.5} and PM₁₀ particulate levels, particularly given the proximity of the Dixon Road development to Monmouth Comprehensive School. We believe that Monmouthshire Council monitor PM_{2.5} levels for 12 months and model the impact of 405 extra cars on PM_{2.5} before a decision can be made on siting more houses at this location.
7. **Residents will Rely on the Cars as Active Travel is difficult.** The Dixon Road site would struggle to get people out of their cars. The nearest cycle route is 2km away. Cycling from the site involves driving along the busy Dixon Road, Monmouth – already carrying 4,400 cars per day. In comparison the Wonastow Road site is well served by current and planned Active Travel routes with a National Cycle Route going past the site entrance. The Wonastow Road site is within easy walking distance of Monmouth’s major employers such as DS Smith Triwall, Mandarin Stone, Siltbusters and Singleton court.

Environmental Sensitivity

8. **Loss of Habitat for Endangered Greater Horseshoe Bats - Proximity to Rare Bat SSSI.** The site is within 1km of the Newton Court Site of Special Scientific Interest (SSSI) - part of the Wye Valley Bat Sites Special Area of Conservation (SAC). It is a Natura 2000 site, and is protected by law. It is home to the endangered Greater Horseshoe Bats and Lesser Horseshoe Bats. The Dixon Road site is well within the 3Km Core Sustenance Zone (CSZ) for Greater Horseshoe Bats. These bats rely on grazing land (dung insects)

and hedgerows. Development on the Dixon Road Site would remove feeding habitat, hedgerows and commuting lines. It would also increase artificial light.

9. **Site is within the Landscape Setting of the Wye Valley AONB.** The Dixon Road site is within the 'Landscape Setting' (and within 200 metres) and highly visible from the Wye Valley National Landscape (formerly known as an Area of Outstanding Natural Beauty - AONB). Planning Policy Wales says Planning Authorities have a statutory duty to all activities affecting National Parks and AONBs, **whether those activities lie within, or in the setting of, the designated areas.** It adds "Major developments should not take place in National Parks or AONBs except in exceptional circumstances." The development of housing on the Dixon Road is not an exceptional circumstance, as an alternative site is available.
10. **Site is within the Landscape Setting of a Scheduled Monument – Dixon Mound.** Most of the Site is within 500 metres (and clearly visible from) a Scheduled Monument – Dixon Mound. The site has a LANDMAP sensitivity value of Outstanding/High for historical interest.
11. **Loss of Prime Agricultural Land when Lower Grade Land is Available.** The Dixon Road site has been selected in contradiction to planning laws. Planning Policy Wales (Edition 12 - Page 37) says "Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, **development should be directed to land of the lowest grade.**"
The Dixon Road site is of a higher-grade agricultural land (80% Grade2 and 20% Grade 3a). The Wonastow Road site is a lower-grade land (60% Grade 3a, 35% Grade 2 and 5% Grade 3b). Following Planning Policy Wales rules, the Wonastow Road site should have been selected instead of the Dixon Road Site.
12. **Landscape Sensitivity.** The Monmouthshire LLCA shows the Dixon Road site (area M16), having a Landscape Sensitivity of High/ Medium. The Wonastow Road Site is in Area M07, with a Landscape Sensitivity of Medium.
Monmouthshire Council's Landscape Sensitivity report recommends "The area which has the most opportunity is west of recent expansion at Wonastow (M07)." Why has Monmouthshire Council not followed the advice of its own report?
13. **Flooding.** Around 15% of the site is in a flood zone and regularly floods. The last time it flooded was in Feb 2024. The flood zone is around the road entrance and could cause problems for emergency vehicles getting to the site. In contrast only 5% of the Wonastow Road site is subject to flooding (surface water) which the Council says is "minimal and likely to be overcome".

The Wonastow Road site (CS0274) is less sensitive

Site Number	CS0270/HA4	CS0274
Site Name	Dixton Road/ Leasbrook	Land at Wonastow Road
Number of Houses	270	175
Social Housing Provision	50%	50%
Employment Land	No	Yes 2 hectares
Near Active Travel Route	Nearest Cycle Lane 2km away	Yes National Cycle Route 423 passes the site. Active Travel routes planned.
Upstream of Drinking Water Supply	Yes	No
In area failing SAC Phosphate Targets	Yes	No
Prime Agricultural Land	Grade 2 (80%), 3a (20%)	Grade 3a
Bats - site in 3km Core Sustenance Zone	Yes - within 1Km of rare bat roost	No
In Landscape Setting of AONB	Yes Within 500 metres of Wye Valley AONB	No
Setting of Scheduled Monument	Yes within 500 metres of Dixton Mound	No
Flooding - In Zone 2 and 3	Around 15%	Around 5%
Traffic Congestion to Trunk Roads	High - with 100 metres of major pinch point - Dixton Roundabout	Medium
LANDMAP Landscape Sensitivity	High/Medium	Medium

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

Is your representation in support or objection? **Support**

Our Action Group supports the relatively low level of employment land proposed (see below) and the principles of the policy S10. The removal of Candidate sites from the previous RLDP we believe means that MCC has accepted our case made previously that other sites were too far from Monmouth town or were unsuitable due to land issues like the one proposed for Hadnock Road.

EA1b Poultry Units, Rockfield Road, Monmouth 1.3 B1

EA1c Land North of Wonastow Road, Monmouth 4.5 B1, B2, B8

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

Is your representation in support or objection? **Support**

Our Action Group supports the relatively low level of employment land proposed (see below) and the principles of the policy EA1 and EA2 . . The removal of employment land Candidate Sites from the previous RLDP we believe means that MCC has accepted our case made previously that other sites were too far from Monmouth town or were unsuitable due to land issues like the one proposed for Hadnock Road.

EA1b Poultry Units, Rockfield Road, Monmouth 1.3 B1

EA1c Land North of Wonastow Road, Monmouth 4.5 B1, B2, B8

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

Is your representation in support or objection? **Support**

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? **Objection**

Strategic Policy S13 – Sustainable Transport

Development proposals will be required to accord with the Sustainable Transport Hierarchy, as set out in National Policy. This will be facilitated by:

- a) Promoting and prioritising active travel (walking, wheeling and cycling) and public transport above private motor vehicles, using location and design to reduce the need to travel.
- b) Maintaining and improving on the Active Travel Network Maps (ATNMs) to maximise active travel opportunities, including links to these networks associated with new developments.
- c) Ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure.
- d) Ensuring developments are designed to provide safe and efficient access and safe and efficient capacity to the transport network.
- e) Ensuring developments are served by an adequate level of parking provision, with cycle parking given competitive advantage, in accordance with relevant guidance.
- f) Demonstrating how proposals enable solutions to rural transport issues, where appropriate

We consider that it is not possible to achieve the objectives of policy S13 above in relation to site HA 4 for the following reasons . The wish list of requirements above is simply not achievable.

- It is simply not feasible to create a usable Active Travel route from the site to the town centre due to multiple road crossings. Active Travel tends to be a seasonal choice and the principal, although noble, is flawed in that it does not recognise that 25.9% of the population of the county is over 65 years old with many physically unable to cycle or walk especially 2000 metres to the town centre from site HA4.
- For many years efforts have been made by MCC to install a fast charging system for EVs in the Glendower Street car park , This has not been feasible due to the demand on the local electrical supply . It is often forgotten that 15 fast chargers require the same power supply as a town of 8000 people!
- As site HA4 is 2000 metres from the town centre then residents will drive rather than walk or cycle . This means that an additional 405 car parking spaces would be required. It is not feasible to increase the Monmouth town car parking availability by this amount.

19.3.4 Travel plans should demonstrate how road network demand will be mitigated through trip reduction, efficiency and modal shift. MCC cannot demonstrate that site HA4 will reduce road network demand. It is likely to increase it substantially.

Site HA4 should be removed from the Deposit Plan

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

Is your representation in support or objection? **Support**

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**

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**

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

Is your representation in support or objection ? **Objection**

In the Deliver Agreement 3.3 it states that :

- To provide an accessible consultation process and adapt this as necessary to account for individual needs
- To encourage and enable everyone with the opportunity to be involved, if they so choose

Our Action Group consider that the on line questionnaire for the Deposit Plan is too complicated , does not refer to pages for policies in the RLDP and is not accessible to disabled persons.

We consider it not fit for purpose and will be the reason that most responses to the Deposit Plan will be in hard copy.

The Infrastructure Plan included in the RLDP/Deposit Plan is much smaller than that included the LDP of a decade ago and does not adequately address the poor infrastructure of the county , which was one of the key concerns of the Place Scrutiny Committee at their meeting on 28th September 2023. This means that the infrastructure issues are now likely to be left to the last minute when the planning applications are considered.

The RLDP /Deposit Plan needs to be adjusted to address these concerns .

Cabinet member of MCC Cllr Paul Griffiths has made much of the objective of creating 15-minute towns during the promotion period of the Setmerb 2023 RLDP , whereby all shops and services are within that walking time frame. This does not feature in the RLDP or Deposit Plan although it has been used as a marketing tool for promoting them in a positive light. .

It is 2000 metres from the furthest point of the site to Monmouth town centre (Shire Hall) , which could take up to 40 minutes. Research by Sustrans indicates that residents will not come on foot or by bike to a town centre, if it is more than 800 metres away from their home. Therefore, this objective cannot be met in relation to site HA4. .

Part 3 Tests of soundness

Do you consider that the Plan is sound: **No**

Fails legal and regulatory procedural requirements or is not in general conformity with future Wales.

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

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

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

Mitigation vs. Screening:

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

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

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

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

Site HA4 is within 950 metres of Newton Court Bat Site SSSI and is well within the 3Km

Core Sustenance Zone (CSZ) for the endangered (Red List) Greater Horseshoe Bats. At the time of screening, two sites were available for development in Monmouth.

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

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

Fails Test 1. Does the plan fit ? No

Does it have regard to Well-being Goals?

No. The RLDP will lead to an increase in air pollution and will lead to a decline in water quality. Both of these will have an impact on the health and well being of the residents of Monmouthshire.

Does it have regard to national policy (PPW) and Future Wales? No.

We need to protect prime agricultural land, as we need to feed our population. Planning Policy Wales Edition 12 is quite clear that '...agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future.'

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

The site HA4 is of a higher grade of land than another candidate site CS0274 (Land ad Wonastow Road).

The FUTURE WALES The National Plan 2040 highlights the need to protect the rare bats of Wales by establishing buffer zones and protecting functionally linked land to support the Greater and Lesser Horseshoe Bats. The Site HA4 will remove functionally linked land (used by the bats for foraging) as well as established hedgerows. This could result in a decline of the bat populations of Monmouthshire and Wales.

It is impossible for a member of the public to respond to the other bullet points in the Guidance Notes as some refer to documents by initials and others state that documents might not be yet published. For instance the first page of a search on Google for what does NDF mean reveals it stands for Non Deliverable Forwards, relating to currency exchange, not local development plans . We feel that MCC should need to demonstrate that they have met these criteria in writing for us to comment upon them; it is not up to us to judge.

Fails Test 2. Is the plan appropriate. No .

Test 2

In response to the questions posed in the Guidance Notes:

- The plan identifies the local strategy, but it does not adequately reflect the consequences of pursuing that strategy.
- No the plan does address the key issues. It suggests a strategy to achieve demographic change and provide jobs for young people, which is not achievable.
- No it lacks credibility when it suggests increasing the workforce of the county by 21% in the last ten years of the RLDP.
- The rationale behind the plan is flawed as it suggests that just by wishing that more jobs can be created that they will be without financial incentives.
- It cannot meet assessed needs as it does not take account of the small percentage of those on the housing waiting list seeking shared equity properties. Also, sustainable development cannot be so if it works against the adopted policy of the council of accepting the Climate Emergency
- The vision and strategy are at best a wish list and at worst a fantasy of their creators.
- No. In Monmouth's case the option of Candidate Site CS0274 has not been adequately considered as an option to HA4 and MCC staff and councillors have refused to meet to discuss.
- No. It cannot be considered logical, reasonable and balanced when it selects a candidate site (HA4) seemingly purely on the basis in Cllr Griffiths words of "not letting Monmouth miss out"
- No. it cannot be coherent and consistent when it fails to acknowledge that Monmouth has unsolvable major infrastructure issues that other primary settlements do not face.

Fails Test 3 Will the plan deliver No

- The Deposit Plan cannot be effective as it is based on false assumptions, like the ability of the county council to create jobs for young people, change demographics and that building houses creates good jobs.
- The Deposit Plan cannot be implemented as it will be impossible to achieve a social housing rate of 50% , which has no precedent in Wales.

- Usually there is S106 support from developers, but because the county council are trying to impose 50% social housing the amount of S106 money is likely to be negligible.
- Development can only be viable with social housing at a level of 10%, which should be achievable
- There are so many issues with site HA4 that the site will fail regulations when it comes to the planning application stage.
- There seems to be no flexibility in the plan if Preferred Strategy Candidate Sites fail scrutiny tests. Contingency provision can only be delivered if the whole RLDP process begins again.
- The RLDP has already run for 6 years, but the county council have taken no account of its progress or lack of it. 1000 jobs were lost in Monmouthshire in the first five years. This means 7240 jobs now need to be created in 9 years, which would mean a 21% increase in the workforce of the county. Jobs growth in Cardiff, the most dynamic primary settlement in Wales, is only expected to be 7% over this period,

Part 4 Appearance at Examination Hearing Sessions

Objector .. A member of The Gateway to Wales Action Group would like to speak at the Public Examination. Requested language to speak at the hearing session would be English.

Part 5. Welsh Language.

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

The choice of HA4 is detrimental to that objective, as the nearest Welsh Language School, Ysgol Gymraeg Trefynwy, is 3500 metres distance away , far too far to be easily accessible Our suggestion of alternative site CS0274 is only 1500 metres from the school and is accessible by an Active Travel Route close by . .

Candidate Site CS0274 should be substituted for HA4

END



Detailed written response to Monmouthshire County Council to the Deposit Plan (RLDP 2018-2033), including objections to the inclusion of site HA4 and our support for preferred site of CS0274. These responses follow the format (broadly) of the on line questionnaire

on the Deposit Plan

19 pages in total

References are made in response to question 10 to a very detailed separate response to the Deposit Plan

Jonty Pearce of 82 Hereford Road submitted 15.12.24

Gateway to Wales Action Group

Representing the interests of 400 local residents opposed to the development of site HA4

December 2024

Part 1 Contact details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Part 2 Our representation

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? **Objection**

One of the items of concern remaining on the RLDP is that Welsh Government's (WG) response put before the Place Scrutiny Committee on 28th September 2023 and Full Council on 26th October 2023 was dated January 2023. This response must therefore have been to the December 2022 RLDP, not the September 2023 and latest version. It seems therefore that there has been no response to the September 2023 RLDP on which the Deposit Plan is based, from WG. **There has been no response to repeated attempts to MCC from our Action Group to provide evidence of a response from WG to the September 2023 , which forms the basis of this Deposit Plan .** Without WG's endorsement then how can the Inspector judge initially the legitimacy of the plan?

Throughout the process of the RLDP over the last few years the Welsh Government has been clear that it wants houses to be built close to the M4 corridor near to cities like Newport and Cardiff and not in Monmouthshire.

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement

Local Development Plan (RLDP) dated September 2024 in 5.1.1 states

Level of growth in Monmouthshire

Option 1: Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.

- Option 2: Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.

- Option 3: WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs. This is what the Welsh Government want and if adopted site HA4 would not need to be developed.

Location of growth. Our Group consider Option 3 should have been adopted

- Option 3: Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
-

The whole approach is around the need for affordable housing. If you need affordable housing, then build affordable housing only and allocate sites for Housing Associations. This 50% affordable housing is not sustainable for the developer.

Barratt Developments took over Redrow Homes on 22nd August 2024. Subsequent to that purchase, on 28th August, Philip Barnes, Group Land Director at Barratt Developments, warned that the affordable housing policy would deter developers from building on green belt land.

He said that "Barratt has pulled three "in-flight" planning applications being prepared on draft allocated sites "because the spectre of 50% renders the scheme unviable due to the unacceptably reduced (or removed) land value for the landowner". For full quote see <https://www.localgovernmentlawyer.co.uk/planning/401-planning-news/58403-developer-pulls-applications-over-spectre-of-50-affordable-housing-proposal>

Welsh Water have said that the sewers close to site HA4 are unlikely to have capacity and an HMA is needed. There is a real likelihood that new sewers may need to be expensed by the developer at a cost of several million pounds. In this case the 50% affordable housing will not be able to happen.

2.Do you have any comments on the Plan's Growth Strategy. Policy S1

Is your representation in support or objection? **Objection**

Question 2, Policy S1.

The objective to create 6210 new homes is remarkably close to the objective to create 6240 jobs. Creating new homes can create new jobs in construction, but house builders will use their own workforce so new local jobs will not be created.

In the first 5 years of the RLDP the county lost 1000 jobs. Research by commercial estate agents Avison Young Cardiff report (January 2024) forecasts only 2.4% average total growth for Wales in the workforce over the next five years. Cardiff will have the highest growth over the next 5 years of 3.6%. Lichfield's report on Economic Growth forecast for the period of minus 100 jobs from 2022 to 2042. To realise the jobs target of the RLDP would require jobs growth of 21% for the county for the period 2023 to 2033; a totally unrealistic figure!

Currently the number of people in the county aged over 65yrs represents 25.9% of the population. Taking demographic data from the housing waiting list for Monmouth and the likely ages of those purchasing private properties our research suggests that the

demographics could only be changed to 21.9% over 65yrs; a fairly small change . (RLDP ref 6.36 to 6.3.8)

We can find no evidence that high levels of out commuting will not continue in the county (RLDP ref: 6.3.13) particularly for those who purchase private properties in the Preferred Strategy sites . A recent study of job prospects in Monmouth on website Linked In revealed just 12 jobs available at between £12 and £15 per hour. This level of income is far too low to cover mortgage payments on the private housing proposed.

Creating B class use employment land does not mean that employers will move in to an area (RLDP 6.3.14) . Evidence in Monmouth for the existing major employers (except Siltbuster) pay close to the minimum wage, so younger people will not be attracted to move here .

In RLDP 6.3.15 jobs growth is suggested in the sectors of tourism, leisure, food, retail and agriculture. There is ample evidence that both tourism and retail are on the decline and other jobs would again be at close to the minimum wage.

RLDP should be amended to show negligible jobs growth and reflect this in the number of houses to be built. This would reduce the amount of out migration to work which would occur if more homes were built under the Preferred Strategy site HA4,

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? **Objection**

RLDP say "6.4.4 The spatial strategy and identification of suitable sites for allocation in the RLDP reflect the site search sequence outlined in national planning policy. In determining whether or not to allocate particular sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity. For reasons outlined in Part 6 we consider that site HA4 fails on the all the criteria above in bold print.

RLDP says in "6.4.7 In accordance with the PPW12's site search sequence, development proposals are expected to make full and appropriate use of land, with preference given to the development of previously developed land"

A Freedom of Information request response from September 2023 indicates that MCC does not keep a record of brownfield sites so is unable to give preference to these sites.

RLDP says in" 6.4.7For example, all of our settlements are surrounded by agricultural land with a high-level classification as best and most versatile land. Rather, the Deposit Plan allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites.

Site HA4 is the worst connected Preferred Strategy Site in the county and has far higher agricultural value than sites, such as CS0274.

We consider that HA4 site is not suitable for the reasons noted above. If a site for Monmouth must be chosen, then CS0274 should be substituted as it has far fewer issues.

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

Is your representation in support or objection? **Objection**

RLDP Policy OC1 states “7.1.1 It is essential, therefore, that any such development is not at the expense of environmental considerations, including landscape, biodiversity, local amenity and historic, cultural or geological heritage”

Site HA4 fails to take into account all of the above considerations in bold for reasons explained in Appendix.

After 7.2.3 Policy GW1 Green Wedge Designations does not include Monmouth. If it is not included how can environmental considerations be adequately taken into account for site HA4 ? Therefore, it should be removed from the RLDP.

There is a Green Wedge around the Brecon Beacons National Park. But there is no Green Wedge around the Wye Valley National Landscape (AONB). In law a National Park and an AONB enjoy the same level of protection. So, there should be a green wedge around the AONB to cover the Landscape Setting.

5.Do you have any comments on the design and sustainability placemaking policies? S3, PM1,PM2,PM3,HE1, HE2 and HE3

Is your representation in support or objection? **Objection**

Policy S3 (ii) Candidate Site HA4 Creates the need to travel to shop or work.

Policy S3 (iii) HA4 development will not respect the local environment and will detract from the Wye Valley Landscape (AONB)

PM1 Choice of site HA4 offends all the principles of this policy. In particular, 8.3.1 HA4 will increase harm due to pollution of air, light, noise and water pollution.

PM2 Comments as for PM1.

For a more comprehensive response to the policies above and others please see our response to Question 10 regarding site HA4

6.Do you have any comments on the climate change and renewable energy policies. S4, NZ1, CC1 , CC2 and CC3 .

Is your representation in support or objection? **Objection**

Strategic Policy S4 – Climate Change states

(iv) Utilising sustainable construction techniques and local supplies through the adoption of the circular economy principles, where possible.

v) Incorporating water efficiency measures and minimising adverse impacts on water resources and quality.

vi) Using land efficiently and co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel.

In the case of Preferred Strategy Site HA4 development of this site will not conform to points (iv) to (vi) above. There is no evidence that developer Redrow Homes will buy local (iv) . There will be an increase in phosphates entering the river (double the existing farming use's discharges). River water quality will be adversely affected from pollutants including phosphates.

9.2.2 States "In a Monmouthshire context 'Net Zero Carbon' is defined as being a home that seeks to balance its 'essential' operational running costs (regulated energy) from renewable energy sources whilst ensuring the building fabric is to the highest standard (performance rating A)" Redrow homes website clearly states that they will not meet zero carbon emission housing until 2050, not by the end of the RLDP in 2033.

We cannot find mention of Policy NZ1 in this section of the RLDP

Policies CC1, CC2 & CC3 have noble objectives but as to whether they are achievable is outside the scope of this report

Site HA4 should be removed from the Deposit Plan

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

Is your representation in support or objection? **Objection**

10.1.3 states that The Environment (Wales) Act 2016 introduced an enhanced Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) on public authorities in Wales. This places a duty on Council to seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

Site HA4 clearly adversely affects the Sustenance Zone of 3km required for the Greater Horseshoe Bats in the SSI of Newton Court. Also, the local population of dung beetles, a food for the bats, will be adversely affected by the change from Prime Farmland to residential development.

Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery

ii)Landscape setting and quality of place, by identifying, assessing, protecting and enhancing the natural and distinctive landscape, historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character.

iii) Biodiversity and resilient ecosystems by protecting, assessing, positively managing and enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them.

v) Local food production; and

vi) Flood attenuation and water resource management.

Site HA4 clearly adversely affects the distinctive landscape (see ii) above) of the Wye Valley AONB ; a view that has not changed since the Wye Tour of 1780

Site HA4 reduces biodiversity by adversely affecting the foraging sources for the Greater Horseshoe bats of Newton Court. see iii) above

Site HA4 will reduce local food production see v) above, by the change of use from Prime Farmland to residential development.

Site HA4 will adversely affect water resource management see vi) above; by the increase in phosphates caused by the development of the site for housing ,

Policy GI2 – Trees, Woodland and Hedgerows

Development proposals that would adversely impact on trees, woodland and hedgerows that are either a public amenity, of cultural heritage, provide important ecosystem services, are protected, or significantly contribute to GI connectivity will not be permitted.

Site HA4 development will adversely affect GI connectivity

Policy LC1 – Landscape Character

Development proposals that would impact upon landscape character, as defined by LANDMAP, must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection.

Development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects by:

a) Causing significant visual intrusion.

33 LANDMAP is a GIS based landscape resource developed by NRW where landscape characteristics, qualities and influences on the landscape are recorded and evaluated in a nationally consistent data set.

Green Infrastructure, Landscape & Nature Recovery 77

b) Causing significant adverse change in the character of the built or natural landscape;

c) Being insensitively and unsympathetically sited within the landscape.

d) Introducing or intensifying a use which is incompatible with its location.

e) Failing to harmonise with, or enhance the landform and landscape.

f) Losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes of both the built and natural environment; and /or

g) Respecting dark skies.

Site HA4 fails all of the above conditions from a) to g) . Refer to Jonty's work on Landmap

Policy LC4 – Wye Valley National Landscape (AONB)

Within the Wye Valley National Landscape (AONB), any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. In considering development proposals regard will be given to:

a) The long-term effect of the proposal, and the degree to which its nature and intensity is compatible with the character, purpose and overall management of the National Landscape (AONB);

b) The degree to which design, quality and use of appropriate materials harmonise with the surrounding landscape and built heritage.

c) The extent of the landscaping proposed.

d) The need to protect features in the landscape identified as important through

LANDMAP;

e) The extent to which a proposed new building or use will generate additional traffic and the requirement for improvement of existing roads and lanes, including the surfacing of green lanes.

f) The impact of the proposed development upon nature conservation interests.

Development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted. Site HA4 is outside but its development would detract from the character and setting of the AONB.

8. Do you have any comments on the infrastructure policies? S6 and IN1

Is your representation in support or objection? **Objection**

Strategic Policy S6 – Infrastructure

11.1.2 Infrastructure covers a range of services and facilities provided by public and private bodies and includes:

- Physical infrastructure such as transport facilities and related infrastructure (such as footpaths, cycleways), water provision and treatment, sewerage, flood prevention and drainage, waste disposal, power generation and supply, including renewables, digital infrastructure and telecommunications.
- Infrastructure such as schools, healthcare, transport services (including public transport), community buildings, community recycling facilities, sport and recreation facilities, open space, etc.
- Green and Blue Infrastructure (as detailed in Strategic Policy S5) such as woodlands, hedgerows, ponds, green spaces, designed sustainable drainage systems and trees.

Site HA4 does not meet the requirements of 11.1.2 above and Policy S6 for the following reasons:

- It is not practical to install an Active Travel Route to the town centre due to multiple road crossings.
- Sewage treatment is at 100% capacity and Welsh water has not demonstrated its ability to cope with more sewage treatment

- Drinking water quality which is already poor will be adversely affected by run off from the proposed site which will enter the river Wye just upstream of the drinking water extraction point.
- Public transport in Monmouth is acknowledged to be the worst in the county for a primary settlement. There is no rail station and no access to long distance coach travel. Travel by bus to Newport, Hereford and the Forest of Dean is very slow and affects employee's ability to travel to work or for students to access colleges providing vocational qualifications.
- Because of the amount of social housing required S106 contribution from the developer are likely to be small and have an insignificant effect on improving infrastructure. In any event improving the service from TfW will be virtually impossible.

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,H&,H8,H9 & GT1

Is your representation in support or objection ? **Objection**

12.5 New Housing in the Open Countryside

12.5.1 In accordance with PPW12, the RLDP seeks to strictly control and reduce the environmental impact of new dwellings in the open countryside of Monmouthshire. The RLDP defines 'open countryside' as those parts of the plan area lying outside defined Primary, Secondary and Main

Rural Settlement Boundaries or the physical boundaries of Minor Rural Settlements. New build dwellings in the open countryside will not be permitted unless justified by the types of developments noted in Policy S2 and OC1.

Site HA4 is located in the open countryside and is prime farmland

13.1.3 The Local Housing Market Assessment Refresh 2022 - 2037 (LHMA)³⁶ (May 2024) estimates a net need of 453 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027).

13.1.6 Only around 4% of those on the social housing waiting list seek shared equity properties not 17% proposed . Starting to develop a site with the wrong parameters is likely to lead to issues with developers .

13.1.10 Strategic Policy S7 provides detail of the thresholds at which affordable housing will be required. A High-Level Affordable Housing Viability Study has been undertaken as part of the RLDP evidence base, this demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more.

**There is no example in Wales of this level of social housing being achieved .
Feedback from local developers and architects suggest that only 10% is achievable .
Just merely wishing for 50% does not make it achievable ,**

Brownfield Sites

13.1.15 The majority of the financial viability assessments that have been undertaken for housing allocations in the RLDP relate to greenfield sites as does the evidence from the high-level assessments used to inform the policy approach for windfall sites.

In the response to a freedom of information request of September 2023 MCC indicated that they kept no record of brownfield sites so cannot have assessed if any were suitable for housing development.

10. Do you have any comments on the residential site allocations? Policies S8, HA1 to HA18.

Is your representation in support or objection? **Objection**

For a more in depth analysis of the many issues affecting site HA4 and an illustration of the advantages of CS0274 over HA4 , please see the separate submission by Jonty Pearce.

Our Objections to the Dixon Road, Monmouth site fall into three categories

- **Water Quality and Pollution**
- **Traffic Congestion**
- **Environmental Sensitivity**

Water Quality and Pollution

1. **Drinking Water Contamination.** Monmouth derives its drinking water from the River Wye. The River Wye in Monmouth is in a Special Area of Concern for Phosphates. It is also under two notices from the Drinking Water Inspectorate, that says there is a potential risk to human health. One of the notices is for Cryptosporidium, a nasty tummy bug that is chlorine resistant. The Drinking Water Inspector has mandated two upgrades to Monmouth (Mayhill) Welsh Water Treatment Works. These upgrades are not due to be completed until March 2028, and following a period of Monitoring will not be signed off -by the Drinking Water Inspector until March 2030.
2. **Surface Run-off Pollution.** Any surface run-off pollution from the site, during periods of heavy rain (not uncommon in Wales), would flow into the brook network and into the River Wye around 400 metres upstream from where Monmouth gets its drinking water.
3. **Raising Phosphate Levels in the River Wye.** The rainwater runoff pollution from the site would generate extra Phosphate pollution in the River Wye through Monmouth. We have used a phosphate calculator to show that the site would generate an extra 8Kg of Phosphate runoff per year compared with agricultural grazing use. The planned upgrade to Monmouth's Waste Water Treatment works (a key reason why Monmouthshire Council is promoting development in a Special Area of Concern for Phosphates) would only improve phosphate levels downstream of Monmouth town.
4. **Sustainable Drainage Solutions (SuDS) not effective on Phosphates.**
The developer has proposed a Sustainable Drainage Solution (SuDS) to deal with runoff pollution. The problem is that while SuDS can be useful for nitrates, is not very effective

at dealing with phosphates. Evidence shows that only 15 to 24% of Phosphates are removed from a SuDS solution. The British Geological Survey has also highlighted that “For infiltration-based SuDS to drain effectively, the topsoil and the underlying geology need to be free draining”. According to the Soilscape database the Dixon Road site is Clay Soil with impeded drainage (Soilscape 8). The alternative site at Wonastow Road is more suitable for SuDS, as the soil type is Soilscape 12 (Freely draining floodplain soils).

Traffic Sensitivity

5. **Traffic Congestion.** The entrance to the Dixon Road site (HA4) is only 100 metres from the Dixon roundabout, which is a major pinch point for Monmouth.

270 new houses would mean an increase of 405 vehicles and an extra 362 journeys per day on the Dixon Road. This is in addition to the 4,490 vehicles per day already travelling on the Dixon Road and the 36,760 vehicles per day driving along the A40. A Simple journey from Monmouth to Wyesham (less than a mile) often takes 20 minutes. Our calculations show that this could increase by up to 5 to 10 minutes during busy periods.

Based on the average annual mileage, 405 vehicles would create an extra 476 tonnes of the greenhouse gas CO₂ per year, as well as increasing the level of air pollution.

6. **Air Pollution.** Locating an additional 405 cars next to a heavily congested A40 Dixon Roundabout can only increase air pollution. Currently Monmouthshire County Council does not monitor levels of the dangerous air pollutant PM_{2.5} It only monitors NO₂ levels. The nearest monitoring station MM13 Pike House, Dixon Road recorded average NO levels for 2022 of 24.4 µg/m³ (far in excess of the WHO guidelines of 10 µg/m³). Why does the Council not Monitor the more dangerous PM_{2.5} and PM₁₀ particulate levels, particularly given the proximity of the Dixon Road development to Monmouth Comprehensive School. We believe that Monmouthshire Council monitor PM_{2.5} levels for 12 months and model the impact of 405 extra cars on PM_{2.5} before a decision can be made on siting more houses at this location.
7. **Residents will Rely on the Cars as Active Travel is difficult.** The Dixon Road site would struggle to get people out of their cars. The nearest cycle route is 2km away. Cycling from the site involves driving along the busy Dixon Road, Monmouth – already carrying 4,400 cars per day. In comparison the Wonastow Road site is well served by current and planned Active Travel routes with a National Cycle Route going past the site entrance. The Wonastow Road site is within easy walking distance of Monmouth’s major employers such as DS Smith Triwall, Mandarin Stone, Siltbusters and Singleton court.

Environmental Sensitivity

8. **Loss of Habitat for Endangered Greater Horseshoe Bats - Proximity to Rare Bat SSSI.** The site is within 1km of the Newton Court Site of Special Scientific Interest (SSSI) - part of the Wye Valley Bat Sites Special Area of Conservation (SAC). It is a Natura 2000 site, and is protected by law. It is home to the endangered Greater Horseshoe Bats and Lesser Horseshoe Bats. The Dixon Road site is well within the 3Km Core Sustenance Zone (CSZ) for Greater Horseshoe Bats. These bats rely on grazing land (dung insects)

and hedgerows. Development on the Dixon Road Site would remove feeding habitat, hedgerows and commuting lines. It would also increase artificial light.

9. **Site is within the Landscape Setting of the Wye Valley AONB.** The Dixon Road site is within the 'Landscape Setting' (and within 200 metres) and highly visible from the Wye Valley National Landscape (formerly known as an Area of Outstanding Natural Beauty - AONB). Planning Policy Wales says Planning Authorities have a statutory duty to all activities affecting National Parks and AONBs, **whether those activities lie within, or in the setting of, the designated areas.** It adds "Major developments should not take place in National Parks or AONBs except in exceptional circumstances." The development of housing on the Dixon Road is not an exceptional circumstance, as an alternative site is available.
10. **Site is within the Landscape Setting of a Scheduled Monument – Dixon Mound.** Most of the Site is within 500 metres (and clearly visible from) a Scheduled Monument – Dixon Mound. The site has a LANDMAP sensitivity value of Outstanding/High for historical interest.
11. **Loss of Prime Agricultural Land when Lower Grade Land is Available.** The Dixon Road site has been selected in contradiction to planning laws. Planning Policy Wales (Edition 12 - Page 37) says "Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, **development should be directed to land of the lowest grade.**"
The Dixon Road site is of a higher-grade agricultural land (80% Grade2 and 20% Grade 3a). The Wonastow Road site is a lower-grade land (60% Grade 3a, 35% Grade 2 and 5% Grade 3b). Following Planning Policy Wales rules, the Wonastow Road site should have been selected instead of the Dixon Road Site.
12. **Landscape Sensitivity.** The Monmouthshire LLCA shows the Dixon Road site (area M16), having a Landscape Sensitivity of High/ Medium. The Wonastow Road Site is in Area M07, with a Landscape Sensitivity of Medium.
Monmouthshire Council's Landscape Sensitivity report recommends "The area which has the most opportunity is west of recent expansion at Wonastow (M07)." Why has Monmouthshire Council not followed the advice of its own report?
13. **Flooding.** Around 15% of the site is in a flood zone and regularly floods. The last time it flooded was in Feb 2024. The flood zone is around the road entrance and could cause problems for emergency vehicles getting to the site. In contrast only 5% of the Wonastow Road site is subject to flooding (surface water) which the Council says is "minimal and likely to be overcome".

The Wonastow Road site (CS0274) is less sensitive

Site Number	CS0270/HA4	CS0274
Site Name	Dixton Road/ Leasbrook	Land at Wonastow Road
Number of Houses	270	175
Social Housing Provision	50%	50%
Employment Land	No	Yes 2 hectares
Near Active Travel Route	Nearest Cycle Lane 2km away	Yes National Cycle Route 423 passes the site. Active Travel routes planned.
Upstream of Drinking Water Supply	Yes	No
In area failing SAC Phosphate Targets	Yes	No
Prime Agricultural Land	Grade 2 (80%), 3a (20%)	Grade 3a
Bats - site in 3km Core Sustenance Zone	Yes - within 1Km of rare bat roost	No
In Landscape Setting of AONB	Yes Within 500 metres of Wye Valley AONB	No
Setting of Scheduled Monument	Yes within 500 metres of Dixton Mound	No
Flooding - In Zone 2 and 3	Around 15%	Around 5%
Traffic Congestion to Trunk Roads	High - with 100 metres of major pinch point - Dixton Roundabout	Medium
LANDMAP Landscape Sensitivity	High/Medium	Medium

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

Is your representation in support or objection? **Support**

Our Action Group supports the relatively low level of employment land proposed (see below) and the principles of the policy S10. The removal of Candidate sites from the previous RLDP we believe means that MCC has accepted our case made previously that other sites were too far from Monmouth town or were unsuitable due to land issues like the one proposed for Hadnock Road.

EA1b Poultry Units, Rockfield Road, Monmouth 1.3 B1

EA1c Land North of Wonastow Road, Monmouth 4.5 B1, B2, B8

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

Is your representation in support or objection? **Support**

Our Action Group supports the relatively low level of employment land proposed (see below) and the principles of the policy EA1 and EA2 . . The removal of employment land Candidate Sites from the previous RLDP we believe means that MCC has accepted our case made previously that other sites were too far from Monmouth town or were unsuitable due to land issues like the one proposed for Hadnock Road.

EA1b Poultry Units, Rockfield Road, Monmouth 1.3 B1

EA1c Land North of Wonastow Road, Monmouth 4.5 B1, B2, B8

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

Is your representation in support or objection? **Support**

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? **Objection**

Strategic Policy S13 – Sustainable Transport

Development proposals will be required to accord with the Sustainable Transport Hierarchy, as set out in National Policy. This will be facilitated by:

- a) Promoting and prioritising active travel (walking, wheeling and cycling) and public transport above private motor vehicles, using location and design to reduce the need to travel.
- b) Maintaining and improving on the Active Travel Network Maps (ATNMs) to maximise active travel opportunities, including links to these networks associated with new developments.
- c) Ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure.
- d) Ensuring developments are designed to provide safe and efficient access and safe and efficient capacity to the transport network.
- e) Ensuring developments are served by an adequate level of parking provision, with cycle parking given competitive advantage, in accordance with relevant guidance.
- f) Demonstrating how proposals enable solutions to rural transport issues, where appropriate

We consider that it is not possible to achieve the objectives of policy S13 above in relation to site HA 4 for the following reasons . The wish list of requirements above is simply not achievable.

- It is simply not feasible to create a usable Active Travel route from the site to the town centre due to multiple road crossings. Active Travel tends to be a seasonal choice and the principal, although noble, is flawed in that it does not recognise that 25.9% of the population of the county is over 65 years old with many physically unable to cycle or walk especially 2000 metres to the town centre from site HA4.
- For many years efforts have been made by MCC to install a fast charging system for EVs in the Glendower Street car park , This has not been feasible due to the demand on the local electrical supply . It is often forgotten that 15 fast chargers require the same power supply as a town of 8000 people!
- As site HA4 is 2000 metres from the town centre then residents will drive rather than walk or cycle . This means that an additional 405 car parking spaces would be required. It is not feasible to increase the Monmouth town car parking availability by this amount.

19.3.4 Travel plans should demonstrate how road network demand will be mitigated through trip reduction, efficiency and modal shift. MCC cannot demonstrate that site HA4 will reduce road network demand. It is likely to increase it substantially.

Site HA4 should be removed from the Deposit Plan

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

Is your representation in support or objection? **Support**

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**

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**

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

Is your representation in support or objection ? **Objection**

In the Deliver Agreement 3.3 it states that :

- To provide an accessible consultation process and adapt this as necessary to account for individual needs
- To encourage and enable everyone with the opportunity to be involved, if they so choose

Our Action Group consider that the on line questionnaire for the Deposit Plan is too complicated , does not refer to pages for policies in the RLDP and is not accessible to disabled persons.

We consider it not fit for purpose and will be the reason that most responses to the Deposit Plan will be in hard copy.

The Infrastructure Plan included in the RLDP/Deposit Plan is much smaller than that included the LDP of a decade ago and does not adequately address the poor infrastructure of the county , which was one of the key concerns of the Place Scrutiny Committee at their meeting on 28th September 2023. This means that the infrastructure issues are now likely to be left to the last minute when the planning applications are considered.

The RLDP /Deposit Plan needs to be adjusted to address these concerns .

Cabinet member of MCC Cllr Paul Griffiths has made much of the objective of creating 15-minute towns during the promotion period of the Setmerb 2023 RLDP , whereby all shops and services are within that walking time frame. This does not feature in the RLDP or Deposit Plan although it has been used as a marketing tool for promoting them in a positive light. .

It is 2000 metres from the furthest point of the site to Monmouth town centre (Shire Hall) , which could take up to 40 minutes. Research by Sustrans indicates that residents will not come on foot or by bike to a town centre, if it is more than 800 metres away from their home. Therefore, this objective cannot be met in relation to site HA4. .

Part 3 Tests of soundness

Do you consider that the Plan is sound: **No**

Fails legal and regulatory procedural requirements or is not in general conformity with future Wales.

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

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

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

Mitigation vs. Screening:

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

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

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

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

Site HA4 is within 950 metres of Newton Court Bat Site SSSI and is well within the 3Km

Core Sustenance Zone (CSZ) for the endangered (Red List) Greater Horseshoe Bats. At the time of screening, two sites were available for development in Monmouth.

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

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

Fails Test 1. Does the plan fit ? No

Does it have regard to Well-being Goals?

No. The RLDP will lead to an increase in air pollution and will lead to a decline in water quality. Both of these will have an impact on the health and well being of the residents of Monmouthshire.

Does it have regard to national policy (PPW) and Future Wales? No.

We need to protect prime agricultural land, as we need to feed our population. Planning Policy Wales Edition 12 is quite clear that '...agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future.'

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

The site HA4 is of a higher grade of land than another candidate site CS0274 (Land ad Wonastow Road).

The FUTURE WALES The National Plan 2040 highlights the need to protect the rare bats of Wales by establishing buffer zones and protecting functionally linked land to support the Greater and Lesser Horseshoe Bats. The Site HA4 will remove functionally linked land (used by the bats for foraging) as well as established hedgerows. This could result in a decline of the bat populations of Monmouthshire and Wales.

It is impossible for a member of the public to respond to the other bullet points in the Guidance Notes as some refer to documents by initials and others state that documents might not be yet published. For instance the first page of a search on Google for what does NDF mean reveals it stands for Non Deliverable Forwards, relating to currency exchange, not local development plans . We feel that MCC should need to demonstrate that they have met these criteria in writing for us to comment upon them; it is not up to us to judge.

Fails Test 2. Is the plan appropriate. No .

Test 2

In response to the questions posed in the Guidance Notes:

- The plan identifies the local strategy, but it does not adequately reflect the consequences of pursuing that strategy.
- No the plan does address the key issues. It suggests a strategy to achieve demographic change and provide jobs for young people, which is not achievable.
- No it lacks credibility when it suggests increasing the workforce of the county by 21% in the last ten years of the RLDP.
- The rationale behind the plan is flawed as it suggests that just by wishing that more jobs can be created that they will be without financial incentives.
- It cannot meet assessed needs as it does not take account of the small percentage of those on the housing waiting list seeking shared equity properties. Also, sustainable development cannot be so if it works against the adopted policy of the council of accepting the Climate Emergency
- The vision and strategy are at best a wish list and at worst a fantasy of their creators.
- No. In Monmouth's case the option of Candidate Site CS0274 has not been adequately considered as an option to HA4 and MCC staff and councillors have refused to meet to discuss.
- No. It cannot be considered logical, reasonable and balanced when it selects a candidate site (HA4) seemingly purely on the basis in Cllr Griffiths words of "not letting Monmouth miss out"
- No. it cannot be coherent and consistent when it fails to acknowledge that Monmouth has unsolvable major infrastructure issues that other primary settlements do not face.

Fails Test 3 Will the plan deliver No

- The Deposit Plan cannot be effective as it is based on false assumptions, like the ability of the county council to create jobs for young people, change demographics and that building houses creates good jobs.
- The Deposit Plan cannot be implemented as it will be impossible to achieve a social housing rate of 50% , which has no precedent in Wales.

- Usually there is S106 support from developers, but because the county council are trying to impose 50% social housing the amount of S106 money is likely to be negligible.
- Development can only be viable with social housing at a level of 10%, which should be achievable
- There are so many issues with site HA4 that the site will fail regulations when it comes to the planning application stage.
- There seems to be no flexibility in the plan if Preferred Strategy Candidate Sites fail scrutiny tests. Contingency provision can only be delivered if the whole RLDP process begins again.
- The RLDP has already run for 6 years, but the county council have taken no account of its progress or lack of it. 1000 jobs were lost in Monmouthshire in the first five years. This means 7240 jobs now need to be created in 9 years, which would mean a 21% increase in the workforce of the county. Jobs growth in Cardiff, the most dynamic primary settlement in Wales, is only expected to be 7% over this period,

Part 4 Appearance at Examination Hearing Sessions

Objector .. A member of The Gateway to Wales Action Group would like to speak at the Public Examination. Requested language to speak at the hearing session would be English.

Part 5. Welsh Language.

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

The choice of HA4 is detrimental to that objective, as the nearest Welsh Language School, Ysgol Gymraeg Trefynwy, is 3500 metres distance away , far too far to be easily accessible Our suggestion of alternative site CS0274 is only 1500 metres from the school and is accessible by an Active Travel Route close by . .

Candidate Site CS0274 should be substituted for HA4

END

3617

Chepstow Town Juniors FC

View results

Respondent

440

Anonymous

10:59
Time to complete

Part 1: Contact Details

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

1. Title *

2. Name *

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

6. Telephone number *

7. Email *

Part 2: Your Representation

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

8. Would you like to comment on this question *

☒ Yes

☐ No

9. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Chepstow development. We would like to raise the issue of the lack of sports grounds compared to the population in Chepstow. We are having to turn children away from our junior football club because of the lack of grass and all weather football pitches in the local area. We have two pitches at Chepstow Town and have to pay to use Mathern, Shire Newton, Sudbrook and Chepstow & Caldicot pitches to enable our U6-U16's boys & girls team to play matches and train. 80% of our fees is spent on pitch hire. [REDACTED] club which is run by volunteers we are now unable to accept anymore players. More sports facilities should be provided as part of this planning development.

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

11. Would you like to comment on this question *

☐ Yes

☒ No

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

12. Would you like to comment on this question *

☐ Yes

☒ No

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

13. Would you like to comment on this question *

☐ Yes

☒ No

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

16. Would you like to comment on this question *

☐ Yes

☒ No

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

17. Would you like to comment on this question *

☐ Yes

☒ No

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

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. Would you like to comment on this question *

☐ Yes

☒ No

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

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

☐ Yes

☒ No

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

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

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

☒ 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): *

There are no facilities for all the new houses, you need to build sports and other facilities to provide the new development to be able to cope with the new population growth.

Part 4: Appearance at Examination Hearing Sessions

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

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

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

☐ Yes

☒ No

Part 5: Welsh Language

32. 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?

33. 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?



3622

**Wedgwood Park Residents Management
Company Limited**

[View results](#)

Respondent
328 Anonymous

18:53
Time to complete

Part 1: Contact Details

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

1. Title *

2. Name *

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

6. Telephone number *

7. Email *

Part 2: Your Representation

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

8. Would you like to comment on this question *

☐ Yes

☒ No

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

9. Would you like to comment on this question *

☐ Yes

☒ No

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

10. Would you like to comment on this question *

☐ Yes

☒ No

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

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

We support the proposed green wedge around Abergavenny (Policy GW1 7.2.3 page 48) to protect the natural environment, biodiversity and ecosystems and the connectivity between them whilst maximising the benefits to peoples health and well being. We give very strong support to the proposed green wedge north of Herbert Close (Wedgwood Park Estate) beyond the edge of the settlement line along the Deri Road next to the National Park. This would provide essential protection over and above the existing conservation area status (in line with policies HE1 and HE2). The green wedge would help reinforce the clear boundary of the edges of the settlements and preserve the long standing views to and from the national park which is one of the defining features of Abergavenny as a gateway to the National Park. Of note, the woodland within the proposed area is within The Hill CADW registered historic parks and gardens, and the green wedge would recognise its importance in the landscape overlooking Abergavenny and next to open fields.

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

16. Would you like to comment on this question *

☐ Yes

☒ No

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

17. Would you like to comment on this question *

☐ Yes

☒ No

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

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. Would you like to comment on this question *

☐ Yes

☒ No

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

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

☒ Yes

☐ No

Part 4: Appearance at Examination Hearing Sessions

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☒ No

Part 5: Welsh Language

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

3704

Age-Friendly Monmouthshire



Sir Fynwy Oed-Gyfeillgar
Age-Friendly Monmouthshire



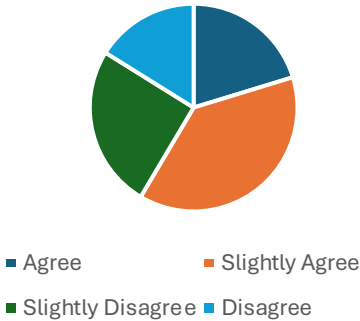
Llywodraeth Cymru
Welsh Government

Age-Friendly Monmouthshire

Housing related overview

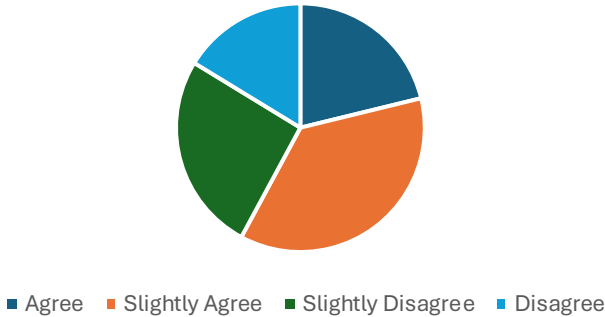
Statement #4: Housing across the county meets the needs of older people

Statement 4 (45-64)



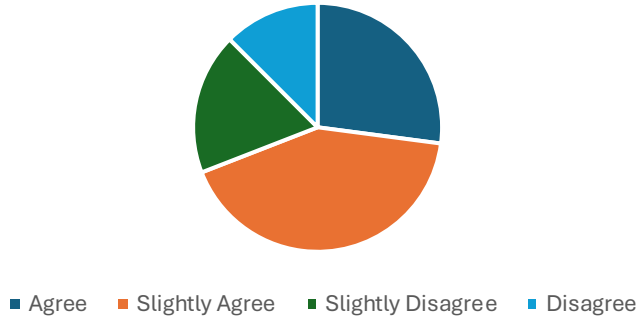
Statement 4	
Agree	88
Slightly Agree	166
Slightly Disagree	110
Disagree	70

Statement 4 (65-74)



Statement 4	
Agree	82
Slightly Agree	142
Slightly Disagree	100
Disagree	63

Statement 4 (75+)



Statement 4	
Agree	78
Slightly Agree	121
Slightly Disagree	53
Disagree	36

Statement #4: Housing across the county meets the needs of older people

- Comments

Accessibility and Suitability:

- There is a notable concern about the lack of housing suitable for older people, with many respondents mentioning the scarcity of bungalows and single-level living options.
- Respondents also highlighted the need for housing that is accessible to amenities and services, emphasizing the importance of being able to downsize and stay within the community.

Affordability:

- The feedback indicates that housing is often too expensive, particularly for those looking to downsize or for older individuals on fixed incomes.
- There is a call for more affordable social housing, especially in rural areas, and for the older local community.

Infrastructure and Planning:

- Many comments pointed out that new housing developments lack the necessary infrastructure, such as medical facilities and transportation, to support the growing population.
- There is a perception that housing needs are being planned more for commuters and the working population rather than for the older demographic.

Social and Community Support:

- Respondents expressed a desire for more community living areas and social housing designed to prevent loneliness and keep older individuals mobile and socialized.
- The lack of social and affordable housing for older people was mentioned, with a focus on the need for more retirement-specific community developments.

These themes reflect a need for more thoughtful housing policies that consider the diverse needs of older residents, ensuring they have access to suitable, affordable, and well-supported living environments.

Statement 4: “Housing across the county meets the needs of older people” - (50-64 age group)
comments

If you disagree, please tell us why:4	Where do you live? Please state the nearest town or village
Don't really know	Monmouth
I have visited some very inappropriate houses, poor ventilation, lack of transport, no local shops or post office.	Raglan
More single level living with assistance if required would be wonderful.	Abergavenny
More bungalows, sheltered housing needed, private and rented	Magor & Undy
I'm concerned about the lack of single storey properties in new developments. These enable people to stay in their own homes for longer	Monmouth
Lack of sheltered accommodation	Abergavenny
Just because you live in monmouthshire discussions on upping Council tax is wrong people here are struggling too and should not be expected to support other areas.posr cde assessment does not work fairly.	Abergavenny
Building more and more retirement communities for incoming retirees from other Counties will increase the H&SC burden.	Abergavenny
Not enough 1 or 2 bedroom bungalows with small gardens	Monmouth
Long waiting lists for social housing.	Caldicot
Lack of new build bungalows	Caldicot
██████████ in the same type of house have been told that their staircase is not suitable for a stair lift. This should be a planning requirement as it will keep older people in their own homes for longer	Caldicot
Because if poor facilities people are moving out of communities leaving those left isolated because local amenities are being closed due to lack of use.	Caldicot
Ability to downsize and stay in your community is key to cohesion and well-being.	Goytre
Housing is expensive to buy and if you are in the rental sector you can easily end up homeless due to chronic shortage of properties	Chepstow
Excessive council tax	Raglan
No bungalows being built	Caldicot
Waiting lists are long for 55+ social housing	Abergavenny
The new Severn View at Crick/portskewett is for the same number of residents as the current one. The elderly population is only going to increase so this shows a lack of for-thought.	Usk
The council no longer provides the type of housing which formerly served the community well. In Raglan there is a small complex of bungalows (probably built in the 1960s/1950s) with a warden housing older residents. This is a perfect arrangement enabling local older people to remain in the village once widowed and elderly. More of such housing should be provided in rural villages.	Monmouth
There is not enough social housing for older people	Magor & Undy
There is precious little social housing for older people.	Abergavenny

I have seen no evidence or am aware of housing projects for the elderly being encouraged or supported.	Caldicot
Doctors and dentists are becoming increasingly hard to find. More and more houses are being built without the necessary infrastructure, such as roads, doctors, schools, dentists, etc, being increased to meet the needs of the increased population. The traffic problems and delays in Chepstow are horrendous on a daily basis, and I know several people over 50 who have had trouble trying to register with a doctors and/or dentist in their local area.	Llanvair Discoed
Not much affordable housing close to towns for retired people	Chepstow
A lot of over fifties live in rural areas where access to services is largely dependent on having access to a car.	Chepstow
More and more older people are moving to Monmouthshire and there isn't enough suitable housing - accessible, smaller properties.	Monmouth
Housing and council tax are not affordable in Monmouthshire. Council Tax is ridiculous. 2 person household paying £4000+ a year in some bands! How is that affordable?	Raglan
Monmouth should look to acquire more town centre buildings and convert to residential.	Monmouth
Lack of affordable and accessible housing.	Abergavenny
the age-specific housing being built is very expensive - if housing associations could build similar but cheaper, it could free up other housing for families etc	Abergavenny
There needs to be incentives and options for older people to downsize and free up family houses for families	Abergavenny
Not enough supported living in locality. Also limited number of residential & care homes would mean having to move out of area if required.	Magor & Undy
Total lack of appropriate housing.	Monmouth
More social housing for over 50's, designed in communities for socializing, activities, keeping people mobile and not lonely.	Magor & Undy
Definitely need more social and affordable housing for the older local community who may have lived in monmouthshire all their lives instead of younger families from different counties buying properties then putting their parents on council lists with various conditions, leaving locals waiting years for council bungalows.	Monmouth
We are talking about over-50s - not retirees or people with physical needs. I think there seem to be sufficient sheltered flats or warden assisted, but in terms of private flats for active people to retire to there are slim pickings - we are lacking private flats with lifts. I think I will have to move away if I ever need something more age friendly.	Monmouth
Expensive housing and private rentals	Raglan
Lack of affordable rental housing which is accessible to those with poor mobility. Abergavenny is getting more and more privately owned apartment blocks for older people of which these developers put clauses in contracts showing little toleration for any care and support needs that may arise as the flat owners continue to age. Older people who do not own a property struggle to pay private rent amounts on their pension	Abergavenny

income and leaves little left over for a suitable quality of living, even when in receipt of all the correct benefits.	
Hundreds of new housing built everywhere but none of it is bungalows.	Caldicot
Not affordable to live here now. I rent but would not be able to buy again because too old for mortgage.	Monmouth
The current system where you have to bid for properties with Monmouthshire Housing is not suitable for the elderly. [REDACTED] who is desperate to maintain his independence wanted to view a property with a view to him renting - we needed to check if the bathroom was suitable, but this request was refused. Apparently, the landlord does not allow viewings. I asked if recent photos could be supplied but this wasn't possible either. How you can expect someone to bid for a property (I was informed you only have three bids before being demoted) if they can't deem it suitable. Elderly people need to be included in decision making, not decisions just made for them.	Usk
What does this actually mean?	Abergavenny
Prices of bungalows are too high, because there aren't enough of them.	Magor & Undy
A lot of older people rent privately and it's too expensive. Not enough Social Housing for older people	Chepstow
There seems to be quite a lot of retirement flats in Abergavenny but I don't know how affordable they are.	Abergavenny
If looking for council housing if your young with children or over 65 your OK but if you are 50 and above there is nothing this age get looked over	Caldicot
Our area in south Monmouthshire is totally over developed leading to lack of community feeling together with strain on resources like doctors that are urgently needed by the older in our community	Magor & Undy
Caldicot has grown massively in recent years yet no increase in older accommodation or care homes. New care facility being built at elderwood will be mainly filled by clients already in care home in chepstow that is due to close.	Caldicot
Need more affordable smaller homes, more warden controlled	Magor & Undy
We need more provision of small apartments and/or accessible houses in the villages - and more retirement accommodation in the community (again in villages). There are many older people unable to downsize and so they are preventing younger families from moving into the area so we have too much of a static ageing population in the villages.	Llanishen
not enough warden housing	Usk
Too expensive and in short supply.	Chepstow
Too much building of new houses without infrastructure	Caldicot
Retrofit older properties	Caldicot
Not enough bungalows are built on new developments, and council stock is few and far between.	Caldicot
Not enough retirement specific community developments, in the public or private sector	Prefer not to say
Do not know	Caldicot
I am not sure it is met for those people that have purchased their own house but social housing seems to be suitable on the face of it. There appears to be "young" people living in some elderly social accommodation	Caldicot
The problem with building so many new homes in and around Caldicot is that you don't put the infrastructure in to support the ever increasing	Caldicot

number of people moving here. It's all very well building new houses in Portskewett and by the castle - but we can't get doctors appointments in Caldicot and Portskewett now, never mind when all the extra people come. Sort the infrastructure and support out if you're going to build hundreds of new homes.	
Lack of social/affordable housing is widespread, often private rented is the only option at hugely extortionate/inflated rents	Abergavenny
Lack of affordable OAP housing and care homes.	Monmouth
Don't know	Chepstow
Don't know	Tintern
Not enough bungalows and social housing for disabled and aged. No sheltered accommodation especially needed for those who live alone.	Sudbrook
Inadequate number of social/affordable housing affects older people as much as anyone.	Chepstow
Not much provision for over 55 housing facilities	Rogiet
More could be done to adapt properties to keep people in their own homes	Portskewett
Need more affordable oap bungalow/flats	Chepstow
Housing stock is limited, I'm ok personally but unsure as to how much provision there actually is.	Abergavenny
Lack of funding and priority to grants and basic equipment mean people are unable to remain safely at home. Two tier system for those who can afford and those who can't	Raglan
housing is expensive , even those who rent pay a high level	Monmouth
More housing in town centres, more car-free or low-car housing, esp. when you get older you may still be able to walk around but not to drive!	This is the only box to comment on in the 'about you' section. This section is really poor - a questionnaire for 50+ that includes an age group of 45-54? Welsh, English, etc are not nationality (which is British) but national identifications (and don't you know that many people identify as, say, Welsh AND British?), only white 'ethnicity' is 'white British' - you sure about that? The order of religions makes no sense. The only good one is the carer questions which has good descriptions
When unwell the length of time taken to evaluate needs is unacceptable.	Prefer not to say

the only community facility near to my village is a mile away, and driving there is the only option, as no pavements are provided along the road to the village hall.	between abergavenny and Usk
Not enough options for bungalows in the Monmouth area, when elderly people want to stay living independently near to family	Monmouth
This is totally dependant on your own home. Can't answer for anyone else.	Monmouth
New housing estates do not have local shops e.g. Llanfoist. Banks and POs closing.	Abergavenny
I was told by a monmouthshire housing representative called Wendy that everyone over 60 in monmouthshire is homeless	Caldicot
Affordable housing/Monmouthshire? You're having a laugh right? I wouldn't qualify for social housing I don't think, buying a house here was a shockingly expensive, and my children can't afford to buy here	Abergavenny
Monmouthshire is very expensive to live in terms of council tax and property costs.	Monmouth
There is not enough social housing available	Chepstow
Unless you own a house or have a large income it would be incredibly difficult to afford rent	Monmouth
There is not enough single storey accessible affordable accommodation available. Not everyone wants to live in an apartment or sheltered accommodation. Providing single storey accessible accommodation not only would free up larger properties for families but also address the lack of accessible accommodation for people with mobility issues that are not 50+ This in turn would keep the younger generation with those needs living and working within Monmouthshire!	Usk
The price of houses is exorbitant when they are of poor quality also. There are too many second homes which prevents local residents from buying a home. Rental properties are few and far between and again the cost is astronomical.	Raglan
Most of the over 50 housing have tiny rooms, communal areas like that of a nursing home with a smell of cheap disinfectant or wee. Grotty.	Abergavenny
Not enough decent housing for elderly. Plenty of elderly living in substandard private housing. Expensive utilities.	Abergavenny
Not enough provision for social care housing. Too many estates being built with large houses for families. Very little provision for older people to downsize.	Magor & Undy
Most of the new builds are 4 bedrooms, where are the 2 bedrooms?	Abergavenny
smaller - one bedroom and one storey accommodation is VERY limited.	Monmouth
I own my property so at present am not in the need for housing, in the future it may be that a bungalow would be preferable and there should be enough of this type of housing for private ownership accessible to amenities.	Usk
It's hard to know - speaking personally I have my [REDACTED] within walking distance of town, but was unable to remain living there independently as [REDACTED] and more importantly have any sort of social life. All adaptations	Raglan

to our home were made by ourselves with no expectation of L.A. - they can't take any credit for housing across the county???	
Not enough housing for older people, access to bungalows.	Caldicot
This is a rural community. There are almost no community or social services outside the towns of Monmouthshire. Also, even if you have your own transport, you have to book online even for services such as taking waste to the dump.	half way between Usk and Abergavenny
Opportunities to downsize and stay in the same area are limited.	Monmouth
Limited	Monmouth
There are too few bungalows being built and are available to rent/buy. Masses of housing being built but family houses being occupied by older people who can't downsize or move to somewhere with more accessibility.	Portskewett
I think we need more bungalows building in the area.	Abergavenny
Monmouthshire has many rural communities who lack basic infrastructure such as mains water/sewage, heating and street lighting, poor road conditions and housing stock is often of poor quality, not well insulated or heated and many are single glazed. Affordable housing is also an issue and ground floor flats and bungalows lacking in many areas. Access to social activities/amenities/services is non-existent for many and they rely on friends and family to support them. Poor internet access is also a real problem in many rural areas.	Abergavenny
[REDACTED]	Gilwern
Do not feel able to answer	Gilwern
I don't think local residents can afford MOST local properties.	Abergavenny
Local residents priced out of the housing market.	Abergavenny
Prices are so high. You may get more for your house but to get another house is also more. Council Tax is getting so expensive.	Abergavenny
V. limited provision for assisted living etc.	Raglan
Lots of community facilities within walking distance of where I live.	Usk
Need more bungalows or one storey buildings where older people living in 3/4 bed properties can downsize freeing up family homes	Abergavenny
There needs to be more future proof housing for people as they age.	Usk
Hurd to climb on a first floor	Chepstow
No option to say don't know!	Raglan
Very expensive to live here	Monmouth
Houses built with no thought whatsoever. Local services in decline due to businesses killed off by poor parking and ridiculous business rates.	Monmouth
Nope. [REDACTED] because younger people can't afford to buy it so I can't downsize meaning I'm having to pay more for energy bills	Chepstow
More social housing needed.	Caldicot
Need more smaller housing. Too many executive homes.	Penallt
Housing prices are very expensive.	Monmouth
Housing is not affordable in Abergavenny and there is limited availability.	Abergavenny
Housing is a scandal UK wide, and has been since councils were forced to sell off social housing. Shocking state of affairs for old and young alike.	Usk

[REDACTED] but I believe that due to the mishandling of public money, and now council taxes keep going up at an alarming rate, I think we will become less comfortable. The government think that if you live in Monmouth you are rolling in it, this is simply not true. We might well have a house we own but we are not rich.	Abergavenny
I don't know the answer to this	Abergavenny
A lot of older person accommodation has been rented out to young families	Chepstow
property is so expensive in Monmouthshire, and is mostly unsuitable for older people. [REDACTED] - a bungalow - is more expensive than my current 2 bed house. I'm not yet ready to live in a flat or retirement community. New Builds often don't include bungalows I see them advertised, but often are out of town or in small villages, where there is little or no public transport	Abergavenny
Not enough low cost one floor housing available for older people to retire to.	Gilwern
I have no opinion.	Caldicot
I think housing is an issue for all ages in Monmouthshire.	Chepstow
Not enough housing for older people.	Raglan
Not enough over 55's accommodation in the Chepstow/Bulwark area with a garden.	Chepstow
I strongly disagree	Abergavenny
Cost of housing is prohibitive	Chepstow
More bungalows need to be available. [REDACTED] but would consider a smaller bungalow if available.....build more as permission for housing is given....none at Brunel development!!!!	Chepstow
Not aware of much/any housing development done with older residents in mind	Chepstow
I am very involved with [REDACTED] their options from Monmouthshire county council, I find there is provision, however the council are relying on the homeless to have charged mobile phones and be mentally capable of actively pursuing housing, which, particularly if they have a drink or mental health problems, is often not the case. In these cases better housing provision is needed and a more pro active approach on the part of the council is needed.	Chepstow
I really have no idea, bit of a daft question for people 50 to 70/80 i think	Chepstow
Affordability is a worry for some.	Llangwm
actually I don't know, but there is no option for that	Chepstow
Lack of available social housing.	Abergavenny
[REDACTED]	Monmouth

[REDACTED] Monmouthshire could be more innovative in their thinking when it comes to providing housing like other places in the UK. There's options like tiny homes which can be off grid and have alternative waste options thus putting less pressure on the already neglected infrastructure for amenities that we have. The situation is appalling and causing those in an already challenging position even more stress. There is no dignity in [REDACTED]	
[REDACTED] This is wrong ruling as you should be able to get housing over 60 with the council [REDACTED]	Caldicot
unable to answer	Usk
Not enough lifetime homes or convenient smaller homes	Abergavenny
You do not enforce rules on parking on pavements outside homes making access impossible. Lack of double yellow lines on clearly required areas. Makes access to homes difficult	Monmouth
Availability of good affordable accommodation is a problem across the country	Chepstow
shortage	Usk
New housing developments do not have new shops or doctor's surgeries as they should.	Monmouth
I have no idea - does this mean council housing?	Tintern
(very poor needs more) I was treated very badly by housing services for years, despite numerous health conditions (GP letters etc.) advising need for bungalow - goal posts moved after, told too young, not maximum	Monmouth

occupancy even in one bedroom i.e. a couple more likely (shock people under 60 do need more help than some older people.) More should be done to weedle out people that abuse housing system e.g. Wyesham	
I live in my own house and it meets my needs	Maes-Y-Gwartha
With so many people extending their houses I think we're going to be left with a shortage of small properties, especially single story.	Monmouth
Lack of bungalows and elderly friendly social housing	Chepstow
There isn't enough affordable housing	Usk
More bungalows needed	Magor & Undy
Lot of old, big, hard to heat houses. Not much available for downsizing that is desirable	Trellech
If over 55 and on list you can bid for housing but if 50 there is nothing there is a big gap between 20 to 40 then it seems to be over 60	Caldicot
Limited social housing and smaller properties	Magor & Undy
Not enough affordable smaller homes for older ppl. If there were lovely places we could downsize to the bigger homes would free up for families! We are currently in a five bedroom home too big for two but there are just no alternatives! Private complexes for the older generation is the way to go!	Magor & Undy
As population ages more opportunity to downsize would be very helpful.	Caldicot
There is a lack of NHS dentists in the Magor and Undy area. It is extremely difficult to get to see a doctor here. The Magor surgery is underused, quite often only having 1 GP in attendance meaning that a lot of people have to travel to Caldicot for appointments.	Magor & Undy
More 1 or 2 bed properties should be available for older people	Chepstow
Is this survey a joke?	Chepstow
Benefit of being 51 is buying property years ago is it was a lot cheaper so I've got a nice house	Prefer not to say
As demonstrated by this survey it proves how ageist the council is, also by providing very little housing for the elderly	Chepstow
Affordable housing for older people needs to be prioritised	Caldicot
Woefully low social housing.	Caldicot
I don't know I own my own house	Maesygartha
Where to start not all elderly people can afford private nursing homes and some may need to downsize from their long term house to a bungalow, all good if you have around £350,000 spare! Transition to giving up and selling their family home of 50 years + but still live independently should be a lot easier and more bungalows or smaller houses made available	Chepstow
More bungalows needed for elderly. Apartments with lift but freehold not leasehold.	Monmouth
Not enough experience to comment	Parkhouse Trellech
Too many small houses/bungalows are getting converted by developers into more profitable, larger homes (particularly in rural areas)	Chepstow
Not enough affordable bungalows being built - if more older people could downsize to single storey more family homes available.	Caldicot

A possible summary is:

The comments from the public survey of those who are 50+ and live in Monmouthshire reveal some common themes and concerns regarding housing for older people. Some of the main points are:

- Many respondents expressed a need for more affordable and accessible housing options for older people, such as bungalows, apartments with lifts, or social housing.
- Some respondents also mentioned the difficulties and costs of downsizing from their long-term family homes to smaller properties, especially in rural areas where there is a lack of supply.
- A few respondents indicated that they were satisfied with their own housing situation, either because they had bought their property years ago or because they did not want to move.
- One respondent accused the council of being ageist and providing very little housing for the elderly.

Statement 4: "Housing across the county meets the needs of older people (65-74 age group)"
comments

If you disagree, please tell us why:	Where do you live? Please state the nearest town or village
Don't know	Abergavenny
See below	Magor & Undy
Housing needs are being planned and designed for commuters and the working population. The focus is on building as many houses as possible. For instance where are bungalows being built ?	Magor & Undy
Insufficient investment in housing for the homeless and front line staff.	Chepstow
I don't know the answer to this in sufficient detail.	Monmouth
Shortage of bungalows, which creates a competitive market and higher prices. Developers often replace bungalows with large houses, reducing the stock further. Go to Scotland and see how many bungalows there are there.	
Hard to speak authoritatively on local provision but it is a matter of fact that UK housing provision is seriously lacking.	Monmouth
More sheltered accommodation needed and dwellings built with easy access to amenities	Usk
██████████ there is no help to pay for better insulation and having to pay VAT on any repairs rubs salt in the wound	Monmouth
I am not familiar enough to make a comment.	Llanvair Discoed
House prices and rents are relatively high, difficult to find decent places to rent.	The Narth
Good if you are sufficiently well off to buy a decent home.	
Lack of affordable social housing generally and especially in rural areas.	The Narth
No info, so can't comment	Monmouth
older age specific housing in Mobmouthshire very sparse	Wolvesnewton
very few bungalows	Caldicot
I don't really have enough information to answer this question truthfully.	Monmouth
Most builds for older people seem to be aimed at older people living on their own.	Monmouth
There should be more purpose built Dementia full time care centres for an increasing problem. Long term planning has fallen well short given the availability of predictive data	Monmouth
More bungalow's should be built both for individuals to buy and social housing to rent	Caldicot
Shortage of appropriate social housing	Chepstow
Much more affordable housing is needed	Chepstow
Not all are conducive with the needs of older people especially the disabled	Caldicot
Not enough bungalows available to older people	Chepstow

House and rent prices in and around Chepstow are beyond the pocket of most older people. There is insufficient social housing and few affordable care home places. There are also long waiting lists for home care and frequently, when allocated, is insufficient.	Chepstow
As with such questionnaires, the housing status can be improved.	Chepstow
More affordable accommodation is needed.	Monmouth
Housing in Monmouthshire is relatively expensive. Older people living alone may not have means to downsize. There are insufficient rental properties available to suit the needs of residents young or old.	Usk
More bungalows and community living areas needed for private house owners, not just council tenants. private owners would pay full rent where most of the tenants now in retirement bungalows o pop at hardly anything .	Caldicot
Can't answer - but I think council tax is too high.	Magor & Undy
There are far too many expensive 4/5 bedroom house built in proportion to 2 bed homes.	Chepstow
Shortage of OAP places (people living in 3 beds alone)	Chepstow
More housing for older people - more accessible, fewer bedrooms etc.	Shirenewton
Many more smaller houses are needed to enable older people to downsize.	Chepstow
As a mortgage free homeowner I don't feel qualified to comment.	Gilwern
Private housing is expensive to rent or buy. Social housing is limited.	Abergavenny
Only if you have an awful lot of money, or sometimes no money.	Abergavenny
New builds need to provide bungalows	Chepstow
Council tax is too high for pensioners.	Abergavenny
I have worked in older peoples' housing for 20 years. This includes MCC, MHA, privately owned and now a charity. I understand that there are currently 750 people aged over 60 on Monmouthshire Homeseach. While many of these are adequately housed, many are desperate to move. There is great need for more social housing for older people. There is also the need for older people to move out of family sized homes to free these up for families. Does MCC have any plans to encourage Extra Care facilities in the county? This would free up some of the existing older persons' housing and allow those who move into Extra Care a better quality of life. It would also relieve some of the problem of providing social care in peoples' houses.	Tintern
Smaller houses or bungalows for young people starting off and older single people.	Goytre
Need for more suitable smaller properties for older people to downsize to. Privately owned bungalows.	Penperlleni
Housing list too long	Goytre
Not enough accommodation for the elderly	Abergavenny
Do not have sufficient knowledge to answer this question.	Abergavenny

scarcity of rented housing/ high cost of renting; scarcity of lower cost owner occupied housing; high prices generally of owner occupied housing.	Govilon
Steps, inclines, prevent accessibility	Abergavenny
Don't know	Portskewett
We need more bungalows and accessible flats for older people. Also ideas like older people's villages should be explored	Gilwern
Don't really know enough about this.	Abergavenny
Greater emphasis on the building of affordable accommodation suitable for elderly would then release multi bedroom housing for those on current waiting lists. A potential buy back scheme could be considered inclusive of a "withdrawal" facility for those that signed up, reduces the immediate "payback" by LA and amortises over the years the re-funding to those signatory's & or members of their identified estate.	Caldicot
House prices are high, rental properties are also high and difficult to find.	Abergavenny
The criteria for somebody needing sheltered housing but with a small nest egg is far too strict. Private OAP flats are too expensive to buy or maintain	Abergavenny
Facilities within communities, banks, post offices, leisure activities, care facilities are closing every day. Nothing is done to replace them. The elderly at stuck at home unable to get out and meet people, or access the facilities and services that they need.	Caldicot
We need to invest in some of the innovative 'older age' housing developments becoming more common in EU countries.....pleasant AFFORDABLE complexes where older people, especially on their own, can feel safe and have easy access to social activities, connectivity and help if required.	Abergavenny
extremely high poll tax rent etc on top of poll tax have to pay for garden waste our "tip" is not fit for purpose high shop rental mean high street in trouble council not interested in abergavenny very expensive place to live!!	Abergavenny
communities rather than herding people together in retirement flats/complexes would be better	Glascoed
Need more housing suitable for older people.	Portskewett
No housing for older people wanting to move out of larger houses e.g. bungalows, flats.	Gilwern
There is a shortage of affordable housing	Abergavenny
There could be more small bungalows built for elderly single occupancy, freeing up family size housing.	Abergavenny
Not enough good housing for older people	Abergavenny
More appropriate affordable housing needed.	Abergavenny
There are not enough living accommodations for older people to downsize into	Abergavenny
There is still a need for more ground floor accommodation for older people who cannot afford to buy or rent in expensive purpose built complexes.	Govilon

Seems to be a trend for building 3 storey town houses, which are totally unsuitable for older people. Housing affordability is a national problem for all age groups..	Chepstow
Very little sheltered accommodation.	Chepstow
There is insufficient supply of private rented accommodation and legislation is making the problem much worse.	Chepstow
Expensive.	Monmouth
Not enough bungalows 1 & 2 bedrooms.	Abergavenny
Don't know	Usk
There are too many large, expensive houses being newly built which older people can not afford and don't need.	Usk
Caldicot has lots of bungalows which suit older people, all on flat ground in area I live. Not sure affordability - council is high to pay out of pension. Insulation helps keep heating costs down! Along with cold weather/heating allowance pay.	Caldicot
Housing association do not maintain their stock ie drafty windows no solar	Govilon
Very little older persons accommodation available, although if you can afford it there are a few new blocks available. It's unwise to put single person in same blocks as older people. Not much choice for good quality care/retirement homes.	Abergavenny
Insufficient one floor housing	Chepstow
Housing is tucked away, increasing isolation and reliance on a car. I live mid way between Chepstow and Monmouth but I am looking to move somewhere with easier access to shops, Drs, social activities.	Monmouth
Exceptionally high rate bands with no apparent property checking	Caldicot
I have no real idea about this - i can see all manner of issues that need serious attention but apart from discovering how poor disabled facilities are, I can't really say too much about housing. As far as I am concerned that's a private issue which I am able to manage for myself. I think I would have to give it some serious consideration, but no doubt you have policy folk who could turn their attention to this.	Caldicot

Being a homeowner, I do not think I'm in a position to address this question directly. [REDACTED] [REDACTED] I am able to make some observations. The housing is managed by Monmouthshire Housing Association (MHA) and they appear to be very attentive to residents' needs. Certainly, it is the case when cold weather requires gritting services and the surrounding green areas are well maintained. But while the MHA housing benefits, residents in other parts of Llangybi do not benefit [from the gritting]. That is, the MHA residents obtain a better service than that received directly from the Authority. Presumably, MHA is funded - in small part at least - by our Council Taxes. So, it would appear that our taxes are sponsoring MHA tenants' services where the remaining villagers are losing out. With regards to other aspects of the question, speaking about the local facility, all of the other "accessibility" challenges mentioned previously will prevail. In answer to the general question, regarding the meeting of all needs, the answer has to be in the negative. This is a greater issue with the forecast increase in Council Tax rates. This will negatively impact residents in the age group being considered. Many will have worked hard all their lives to purchase their home and will no longer (during retirement) necessarily have the income necessary to afford increased taxes alongside cost of living pressures.	Usk
I can't answer this question, as I don't know.	Raglan
Not enough affordable housing for the elderly and disabled people.	Dingestow
Not enough social housing or bungalows.	Monmouth
No evidence of suitable housing new or old in the area	Usk
Don't know	Llangybi
Places in care homes are limited.	Chepstow
More bungalows and accessible flats needed. House prices are high.	Usk
[REDACTED]	Llandenny
Really pleased with wet room installed by Monmouthshire Housing Association	Usk
Don't know enough to comment.	Usk
When i need to move to an accessible or adaptable house, there is little choice of where I can go.	Skenfrith
High costs of housing.	Monmouth
I don't know. [REDACTED].	Abergavenny
	Abergavenny
Housing costs too expensive.	Prefer not to say

██████████ which I can adapt to my needs and I like where I live. Unsure across the County.	Chepstow
Not enough housing for the elderly and disabled. Not enough benches for people to rest when walking from their homes to local facilities.	Caerwent
I don't know	Monmouth
No idea	Llantilio Crossenny
You cannot get social services unless you pay through the nose for it. ██████████ which means he has to get by as best he can as he can't afford this.	Abergavenny
We should be building more housing built to passive house standards to improve comfort and affordability and start a retrofit program of existing housing stock to bring that up to standard too.	Abergavenny
Can't downsize due to lack of suitable properties, considering moving out of Wales.	Chepstow
Need more new builds to have a proportion of single storey (bungalows) to enable elderly to downsize	Chepstow
Limited social housing stock available.	Chepstow
I own my own home but I doubt the amount of rented properties are within budget for many older people	Chepstow
Retirement village would be good	Chepstow
With an aging population there is not enough small housing or bungalows for people to downsize to.	St Arvans
We have a lot of new housing in the south of Monmouthshire, most of which is for families. Friends of my own age are now wanting smaller properties with less maintenance and level access, which is really hard to find in a hilly town like Chepstow. But there are level sites, sadly these are not prioritised for the needs of the less mobile.	Chepstow
Housing needs for the whole of UK needs a complete shake up for all ages	Chepstow
Difficult to trade down to more appropriate housing, e.g. too many three storey properties being built	Chepstow
Bungalows are in short supply and command a very high price. I would like to downsize to one, but cannot afford to do so.	Chepstow
I am at present trying to downsize and want to be within walking distance of a town centre (Monmouth or Chepstow) but there is not much available. I realise I am privileged to be able to buy rather than rent.	Chepstow
Appropriate housing for the elderly are low level or bungalows with or without assisted living. The new Elder Parc estate in Portskewett are all houses with no consideration for the elderly. You as a council signed this off. You as a council has not assured residents that you have made preparations for this by having a plan to increase medical surgery needs or to accommodate increase in school pupils for the 285 new homes	Portskewett

Y	
Most of the housing is fairly large family housing	Chepstow
Think there is not enough suitable housing for older people.	Chepstow
Incredibly varied across county	Chepstow
Not enough community spirit or safe activities in sheltered accommodation. Older people are isolated and not encouraged to do extra activities.	Chepstow
Very few bungalows are built on new housing developments.	Magor & Undy
Not enough affordable bungalows	Tutshill Chepstow
There is inadequate affordable housing in the county. By this I mean housing available for long term rent at affordable prices for the less well off in the community.	Chepstow
I think it probably meets the needs of those who are reasonably comfortably off. I question whether it meets the need of those on lower incomes/ pensions but lack the information to give an informed opinion here	Chepstow
Not enough housing provided by the council. Though contentious there are houses with one older person living in leaving families homeless or cramped. Provide good quality housing that would encourage and support movement in the housing sector	Chepstow
Not enough good social housing for people on pensions. There needs to be a scheme which allows pensioners with a property to buy part of a property without having to pay a huge mortgage payment each month. This way they could supplement the pension with their equity and simply leave the portion of the property to children when they die. If they do not own property then the standard of low cost rental should be raised. Older people have contributed to our economy all their lives and should not have to worry about their ability to afford a decent home.	Caerwent
Cannot answer for whole of county, Monmouth seems to provide comfortable housing - Abbeyfield & Home Forge some way from town centre - pavements not safe - very narrow in places in Goldwire Lane and very uneven near Ty Price Community Hall, St Thomas's square.	Monmouth
Many older people live in properties that are now too big for them, but there are very few bungalows, especially new build bungalows for them to move into. This means that many family sized properties continue to be occupied by older couples or single people, thus meaning fewer families can find suitable properties. Developers should have to include two or three new build bungalows on every development	Chepstow
There is a need for more spacious social housing for older people. Just because you are older does not mean you have to forego space for activities and visitors.	Monmouth
There is a need for more independant living private and social accommodation.	Mathern
I do not think there is adequate provision for care homes. As there is an ageing population more provision for care homes will become critical. For example, I cannot understand why the Severn	Chepstow

View rest home is being replaced by one in Portskewett with fewer beds. Once it is closed it should either be renovated or replaced and not repurposed.	
Insufficient bungalows being built. New housing is aimed at new buyers and families.	Crick
Most new housing is aimed at families.	Crick
Not applicable as I have no experience or engagement on this.	Rogiet
Lack of bungalows for older people near facilities.	Magor & Undy
Older people find it hard to downsize or get bungalows, also would be nice to live with people the same age.	Caldicot
Need more accessible bungalows locally; need more opportunity for people to 'downsize.'	Caldicot
Greater need for single storey dwellings	Usk
Not enough affordable housing, and in new housing areas, the oft-promised support infrastructure, schools, community shops, etc, fail to materialise.	Raglan
Financial assistance with energy saving improvements. [REDACTED] [REDACTED]	Chepstow
Monmouth is not providing sufficient homes for rent or purchase that meet the needs of older people,	Monmouth
Considering the increasingly ageing population, there is not enough community based living accommodation (with transport to town) If anyone required care later in life, it would be easier for care staff to carry out their duties in such a place.	Redbrook, Monmouth
[REDACTED]	Chepstow
I have no personal experience of this but from what I read in the local paper they are doing a bad job on housing	Llanvihangel Crucorney
A lack of age suitable housing within walking distance of amenities	Chepstow
Housing rental and purchase is very expensive	Gilwern
Am concerned that village is becoming a retirement area - how do young people/families afford a home.....	Gilwern
Not enough bungalows	Caldicot
I am aware of some housing for the elderly being available but it is not enough, given the ageing population.	Magor & Undy
As above regarding accessibility to transport. Also, housing is expensive and largely not adapted for the needs of older people.	Tintern
Few 'downsizing' options with appropriate facilities.	Chepstow
You need to have a don't know category	Monmouth
The lack of affordable housing is a well known issue although it does not affect me (now). Despite being a professional it took me ten years after arrival before I was able to afford a house in Monmouth.	
There is housing for older people, but do they have access to the town e.g. by bus. Are the buses easy for more elderly people than me to get in and out?	Abergavenny
Very little social housing for those on a lower income. Relatively few bungalows for those with mobility issues.	Abergavenny

Affluent in the county can afford the expensive retirement flats in the towns eg Abergavenny.	
when I get to the point when I can no longer drive or live independently what support can I expect. As regards housing affordability please identify appropriate housing designed and in proximity to community and social services which allow older residents to live comfortably and safely, while housing affordability gives them peace of mind.	Magor & Undy
If older employees need to down size there are very few appropriate properties available eg flats or bungalows large enough for two people	Magor & Undy
Not enough housing or choices	Caldicot
Not enough for older people only families	Magor & Undy
See my point in Statement 1	Magor & Undy
Need more over 60 sheltered housing	Chepstow
Housing in my area is good quality but socialising is difficult because of transport! See above.	Tintern
More bungalows required in the area. Also apartments with lift facilities. Free-hold.	Monmouth
I'm fine but it may be others find they need more appropriate housing	Monmouth
Generally housing provision is good. However, there seems to be a dearth of bungalows in town for elderly people.	Abergavenny
Too few well designed, energy-efficient ground floor 2 beds. The private market will never meet this need affordably and social housing is narrowly construed i.e. only available to v. lowest incomes.	Abergavenny
Should be smaller homes for people to downsize and free up larger houses for families	Chepstow
Still needs improvement. I am fine (provide my own support) others are struggling and this is a UK wide problem. Old housing stock that needs modernising. Problems of cost and provision of building maintenance.	Monmouth
There are insufficient bungalows for the elderly - also when retired people want to downsize thus freeing up larger family homes there are limited options. Why aren't new developments including a few bungalows??	Mathern
More affordable homes/more affordable rents	Chepstow

Summary of Public Survey Comments on Housing for Over 50s in Monmouthshire

Positives

- Good quality housing is generally available in the area.

- Social housing is acknowledged to exist, though it may have certain limitations.
- Private housing market is active but may not cater to all needs.

Areas for Improvement

- There is a significant need for more sheltered housing specifically for those over 60.
- Transport issues hinder socialising for elderly residents.
- There is a strong demand for more bungalows, particularly for elderly residents and those wishing to downsize.
- Apartments with lift facilities and energy-efficient ground floor two-bedroom homes are required.
- Private market housing does not meet affordable housing needs adequately.
- Social housing is perceived to be narrowly targeted, mostly at the lowest income brackets.
- Old housing stock requires modernization and building maintenance is a significant cost issue.
- New developments are criticized for not including enough bungalows.
- There is a call for more affordable homes and rents.

General Observations

- Monmouth residents feel that housing provision is generally good but lacks sufficient bungalows for elderly people.
- Abergavenny respondents highlight the need for smaller homes to enable downsizing, freeing up larger houses for families.
- Chepstow comments note that while some individuals manage well on their own, others struggle with housing issues, which reflects a broader UK-wide problem.

Statement 4: “Housing across the county meets the needs of older people” (75+ age group)
comments

If you disagree, please tell us why:4	Where do you live? Please state the nearest town or village
Not enough housing for disabled.	Abergavenny
Need to drive to community and social services.	Usk
Property is good but constant issues with parking and failure to complete minor works causes stress and anxiety and the appointment of community support officers are a farce	Caldicot
Smaller, and volume of, social housing shortage.	Monmouth
There is a need for more small housing in the area and fewer 4-5 bed houses.	Monmouth
New housing is focused on bigger homes and not aimed at older downsizers at all.	Abergavenny
Insufficient high quality sheltered accommodation	Usk
████████████████████ but know that people that have waited 18 yrs for a bungalow, when both of them (even 18 yrs ago) are disabled, in wheelchairs, and one unable to use stairs at all. They have just been re-housed after 18 yrs on the list waiting for a bungalow.	Monmouth
I answered this because I don't know the answer to this question in general. I have no issues or complaints about my home and immediate local environment personally although we seem to have increasing incidents currently of vandalism where we have rarely experienced it before so this is a concern at the moment.	Monmouth
Not enough retirement accommodation to enable retirees to 'size down' and sell family suitable accommodation.	Trellech
Not enough bungalows	Dingestow
Don't know	Caldicot
We are ok but not so sure for others	Magor & Undy
There is a need for more different types of bungalows for older people to downsize into in the Caldicot area	Caldicot
I'm concerned about lack of housing for younger generation, more expensive houses being built but no increase in facilities i.e. doctor, hospital, community facilities.	Caldicot
Own home.	Chepstow
More affordable housing	Chepstow
Don't know	Caldicot
This type of facility is available I assume in built up areas but is non existent in rural areas where many older people live in increasing isolation and I would guess poverty due to the cost of upkeep of houses that can be old, large and expensive.	Llanvapley
Not enough Bungalows/Single storey properties for older people to downsize. Older people blocking suitable family accommodation	Abergavenny
Relatively expensive housing can put a financial strain on older people.	Monmouth
I am a home owner so cannot comment directly.	Abergavenny

Rents high - difficult to find small bungalows for people downsizing i.e. elderly.	Penperlleni
Not enough smaller properties to allow older people to downsize.	Abergavenny
I wouldn't know!	Penperlleni
Need more 2 bed bungalows.	Goytre
Need more suitable for downsizing.	Abergavenny
If I were unable to drive, I should need to move to a town. However, there is no affordable housing, as proximity to facilities and public transport drives up property prices.	Gilwern
Not enough housing for older people	Abergavenny
More sheltered living needed	Abergavenny
Inadequate provision of social housing. Rents and house prices high. We need rent control.	Abergavenny
I live in a rural area of Monmouthshire there is no assistance available for me. My income is too great to obtain any grants or assistance. For example I have to take my refuse up my long drive and place it in a suitable area to be collected. The new bags provided are heavily weighted and therefore heavy to lift also the glass container very quickly becomes too heavy. The Llanfoist refuse centre is how I and many rural residents have to deal with our refuse.	Abergavenny
I assume the lack of decent funding prevents the Local Authority from providing more appropriate and up to date accessible housing apart from going in to a home that has been purpose built over looking McDonalds and the community tip	Llanthony Valley
All new developments assume that everyone is a car owner. This does not only apply to older people. General nationwide bad house design.	Abergavenny
I work with CAB and find our clients have difficulty finding appropriate housing	Abergavenny
Private housing v. expensive and often outside towns with ltd public transport	Gilwern
Older people need to be near to the town and unless you have money to buy a flat or house this means you can be housed out of town.	Abergavenny
Not enough social housing!	Abergavenny
Don't know	Abergavenny
Low cost single storey need in most areas.	Magor & Undy
I cannot responsibly answer this question accurately since it refers to housing across the County. All the other questions above I have assumed the context is Abergavenny and surrounding areas. Maybe this is wrong.	Abergavenny
Sheltered accommodation available - if room there when needed.	Abergavenny
More sheltered housing needed.	Usk
Doesn't apply to me	Abergavenny
More social housing is needed. Also housing for single people. The location of dwellings needs to be linked to transport, community and social services.	Abergavenny

Housing in the social sector is scarce and often in very small flats which is not what older people really want. We are the age group who love to potter in a small easily maintained garden. Housing needs to be close to a local shop and transport	Monmouth
Need more affordable bungalows so older people can downsize	Abergavenny
Affordable	Raglan
Need more affordable single storey accommodation.	Trellech
We need smaller houses for the elderly, and for the young first time buyers.	Monmouth
All houses are all too large for single people.	Monmouth
Limited housing within safe walking distance of amenities.	Monmouth
Insufficient	Gilwern
Because I own my own home.	Usk
Not enough sheltered accommodation	Abergavenny
Usually flats and houses for older people are not near town.	Abergavenny
Don't know about this subject.	Rockfield
Do not know.	Monmouth
Although I have my own home I am aware that there is not enough social housing for young and elderly people.	Talycoed
New housing tends to be for families. If more smaller houses were available, older people could sell/ vacate bigger houses for smaller ones to meet their needs.	Abergavenny
These are empty words. No-one checks to see if my house is safe or comfortable and house prices in Chepstow are not exactly affordable!	Chepstow
Not enough housing.	Caerwent
Not enough housing for aged.	Caerwent
Little scope to downside to single person accommodation, especially in rural areas	Abergavenny
I live in Forest of Dean so can't comment. I use Monmouth leisure as closest to us.	Forest of Dean
How am I to know?	Trellech
Have no experience of this.	Govilon
Hasn't concerned me.	Govilon
House prices are too high	Abergavenny
The second reason for my move to "town" (Abergavenny) is that there is scant provision for older people (or first time buyers) in housing. No bungalows (affordable ones) available in Pandy, when I needed to move - small ones on Wern Gifford not available at the time. Thus, a move into a restrictive, one-bed flat was the only option.	Abergavenny
I don't know. We can afford our own place. Do not make council tax unaffordable. Since I have always worked and paid everything I do not want to keep those who are not so careful. However those with problems I hope to help.	Gilwern
N/A	Chepstow
Insufficient housing	Chepstow
Many are unable to afford to rent or purchase housing.	Chepstow

Many older people would like to downsize their homes but nothing suitable in the area. No pretty retirement villages in the area.	Chepstow
If an older resident wishes to downsize to a more manageable unit, they are in competition with the younger generation, and there is a significant shortage of affordable units for every generation - especially those which are convenient to local shops.	Chepstow
Insufficient social/affordable housing, and few, if any new developments of such housing. House prices are, in general, approaching the most expensive in Wales.	Llanishen
Too little suitable housing at a reasonable price.	Monmouth
If this is important why have wardens been withdrawn from community accommodation?	Usk
More bungalows needed.	Usk
[REDACTED] complex I cant comment on other housing designs or availability?	Usk
Don't know	Chepstow
[REDACTED]	Abergavenny
No lighting outside flats for older people on Hereford Rd, Abergavenny	Abergavenny
Do not know about housing	Tutshill
Don't know	Chepstow
When developers apply to build new homes, I don't believe there is any legal requirement to build a proportion of single storey dwellings for people with mobility issues. Doors need to be wide enough for wheelchairs	Usk
Not being in council accommodation I have no personal experience, but news programmes would suggest you have a long way to go.	Monmouth
Not being in council accommodation I have no personal experience but news programmes would suggest you have a long way to go.	Monmouth
[REDACTED]	Monmouth
Haven't got enough housing, lots of people in temporary accommodation.	Monmouth
Don't know	Monmouth
A couple who are both disabled - one cannot walk at all - waited 18 years for a council bungalow - recently allocated to them. Much of the population is over 50 - and have their own houses fortunately, but are being penalised by the very high council tax, far higher than most of Wales. Having a house doesn't mean one has the means to pay high taxes.	Monmouth
not enough appropriate for older people	Chepstow
House prices and rents are unaffordable	Monmouth
This is put so generally that is is impossible to answer. What does 'appropriate' and 'affordable' actually mean = the context.	Monmouth

No social housing and extortionate rents, young ones should be encouraged to stay local to support older family members	Magor & Undy
Owning my own home this is not really relevant.	Magor & Undy
Not enough smaller houses and bungalows to allow people to downsize	Chepstow
There seems to be a terrible need for everyone for housing, housing is not available sufficiently.	Monmouth
Not enough experience to comment on housing.	Devauden
Good provision in Abergavenny. Much better than in Torfaen.	Abergavenny
Housing across the county does not meet any of the needs	Monmouth
Housing in Monmouth is pretty good, though there needs to be more bungalows. Regular community buses to train stations, or hospitals would be helpful.	Monmouth
Needs to be more affordable housing for older folk	Monmouth
Insufficient provision, either private or public housing suitable for the elderly. Sheltered accommodation?? Is there any anywhere in the county??	Usk
How would I know, as you have not given me any figures to go by. So I cannot answer this question.	Caldicot
Don't know. I own my own house, I have looked at some retirement places but I found them very pokey. I think they try.	Llanvapley
We elderly people require more smaller i.e. bungalow type housing - then we can release larger houses on to market.	Chepstow

Summary of Public Survey Feedback on Housing for 50+ Residents in Monmouthshire

The public survey of Monmouthshire residents aged 50 and above revealed several key points regarding housing:

Positives

- Abergavenny: Good provision of housing, better than in Torfaen.
- Monmouth: Housing is generally considered good, though there is a need for more bungalows.

Areas for Improvement

- Overall County: Housing does not meet the needs of the population adequately.
- Monmouth: More affordable housing is needed, especially for older residents.
- Monmouth: Regular community buses to train stations and hospitals would be beneficial.
- Usk: Insufficient provision of private or public housing suitable for the elderly; a question on the availability of sheltered accommodation.
- Chepstow: Demand for smaller housing, such as bungalows, to allow elderly residents to downsize and release larger houses to the market.

- General: Lack of experience or information among some residents to accurately comment on housing needs.
- General: Some retirement housing options are perceived as too small or not suitable.

3859

**Swifts Local Network: Swifts &
Planning Group**

View results

Respondent

566

Anonymous

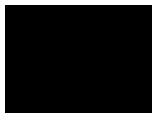
17:52

Time to complete

Part 1: Contact Details

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

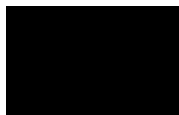
1. Title *



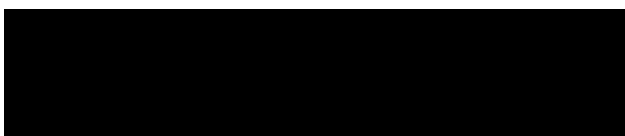
2. Name *



3. Job Title (where relevant)



4. Organisation (where relevant)



5. Address *

6. Telephone number *

7. Email *

Part 2: Your Representation

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

8. Would you like to comment on this question *

☐ Yes

☒ No

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

9. Would you like to comment on this question *

☐ Yes

☒ No

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

10. Would you like to comment on this question *

☐ Yes

☒ No

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

11. Would you like to comment on this question *

☐ Yes

☒ No

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

12. 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)

13. Would you like to comment on this question *

☐ Yes

☒ No

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

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

In summary, strategic policy S5 and its associated policies are very welcome, but please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Monmouthshire.

Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Monmouthshire return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/bricks and other species features are excluded from biodiversity net gain and green infrastructure calculations, so require their own clear policy.

Although not currently included in Planning Policy Wales, swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance in England, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). Features for swifts, bats and hedgehogs are also highlighted as important by the NPPF in England (December 2024).

The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

Many local authorities in England have included detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan>),

which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,

and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift b

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

17. Would you like to comment on this question *

☐ Yes

☒ No

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

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. Would you like to comment on this question *

☐ Yes

☒ No

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

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

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

☒ Yes

☐ No

Part 4: Appearance at Examination Hearing Sessions

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

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

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

☐ Yes

☒ No

Part 5: Welsh Language

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

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