



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit
Representations Register

Volume 22 - Organisations



monmouthshire
sir fynwy

1001	Campaign for the Protection of Rural Wales
1002	Theatres Trust
1006	Usk Town Council
1013	Glamorgan Gwent Archaeological Trust (GGAT)
1016	Chepstow Town Council
1056	Abergavenny Town Council
1106	Llanarth Fawr Community Council
1136	Portskewett Community Council
1138	Raglan Community Council
1239	The Canal & River Trust (Glandwr Cymru)
1255	Home Builders Federation (HBF)
1367	Abergavenny and District Civic Society
1376	Abergavenny Transition Town
1765	National Grid Electricity Transmission (NGET)
1787	Gwent Wildlife Trust
1819	Minerals Products Association
1984	Raglan Village Action Group
2399	South East Wales Regionally Important Geodiversity Sites Group (SEWRIGS)
2532	Cwmpas Community Housing
2542	Devauden Community Council
2548	Shirenewton Community Council
2550	Whitecastle Community Council
3059	Magor with Undy Town Council
3168	Roadchef Motorways Limited
3276	Gwent Police
3454	Chepstow Society
3506	Sport Wales - Miss Alison McCann
3591	Monmouth Town Council
3602	Llanbadoc Community Council
3630	Shirenewton Community Council
3902	Usk Civic Society

1001

Campaign for the Protection of Rural Wales

View results

Respondent

626

Anonymous

4668:49

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)

Campaign for the Protection of Rural Wales

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

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

15. 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)**

16. Would you like to comment on this question *

☐ Yes

☒ No

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

17. Would you like to comment on this question *

☒ Yes

☐ No

18. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

There are two residential allocations: land at Moun-ton Road (HA3) Chepstow and land on former MOD land at Caerleon(HA8), which are both inappropriate land for housing development.

Housing developments need to be planned on a sustainable basis and this includes the necessity of reducing the need to travel by car.

The Moun-ton road site is close to the M48 link road on the edge of Chepstow. The location is not within reasonable walking distance from the centre of Chepstow and public transport is poor. Residents would be almost totally reliant on the car for all journeys from home.

The Caerwent site is not attached to existing housing and is isolated from shops, schools and employment. Again considerable reliance would be placed on the car.

The Welsh Government Planning directorate advised Newport City Council Planning (letter 18/12/2023) that proposed housing developments within easy access of j 24 of the M4 (Coldra roundabout) were not in conformity with Future Wales as they failed to reduce the need to travel by car in that there was no easy access to public transport and other public services.

A similar argument can be applied to both these sites within the Monmouthshire plan.

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): *

The allocation of housing land detailed is not in accordance with Future Wales

Part 4: Appearance at Examination Hearing Sessions

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

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

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

☒ Yes

☐ No

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

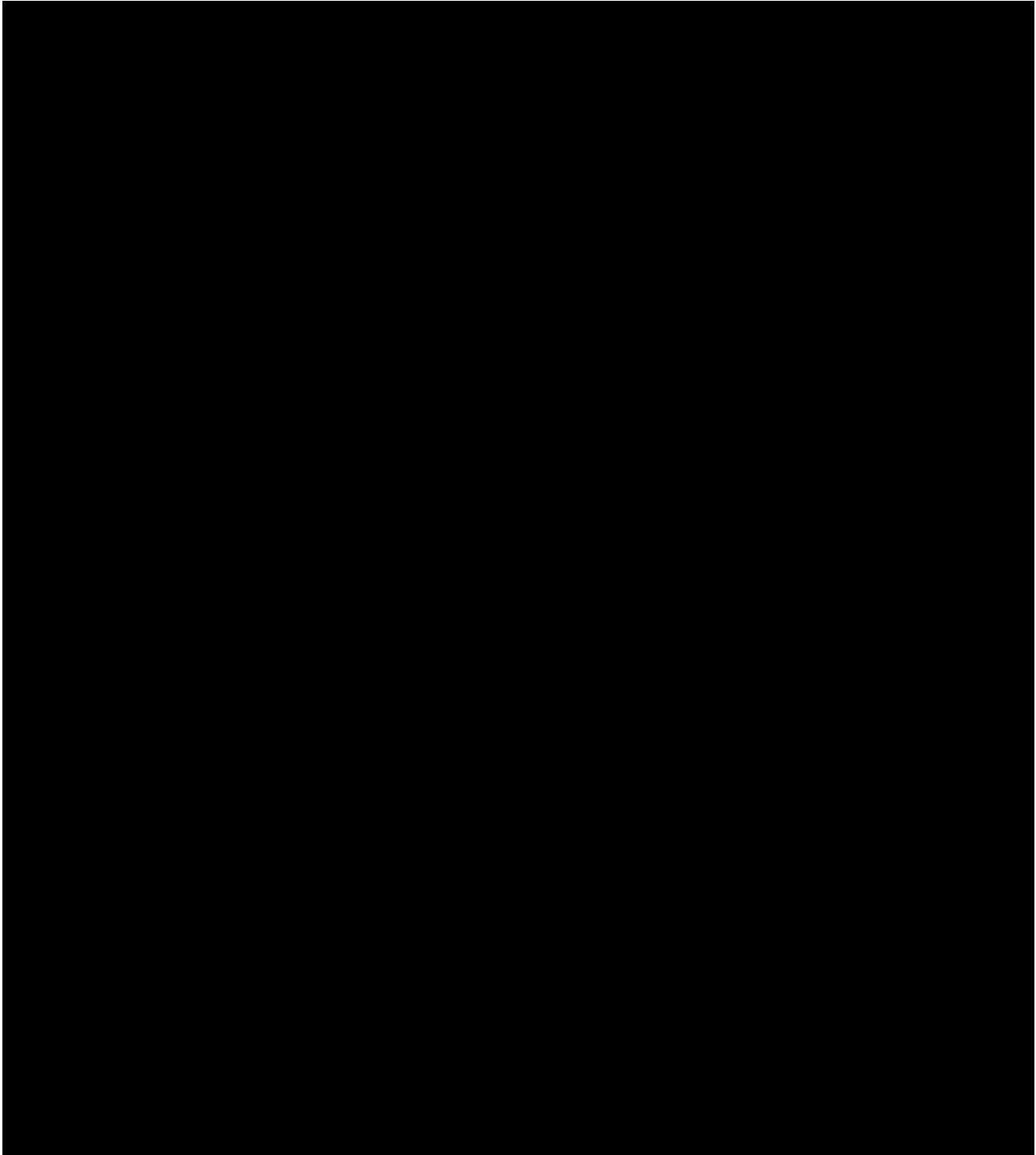
☐ Welsh

☒ English

Part 5: Welsh Language

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

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



1002

Theatres Trust

View results

Respondent

425

Anonymous

11:14

Time to complete

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- ☒ Support
- ☐ Objection

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Policy CI1 – Retention of Existing Community Facilities

We welcome this policy and the protection it provides to existing valued facilities. We suggest however an amendment to wording to make clear that the policy also applies to cultural facilities such as Monmouthshire's theatres. These provide important opportunities for engagement and participation in theatre and the arts, bringing people together, helping to develop skills, and reducing isolation.

**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

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☐ Yes

☒ No

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About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.

You are not obliged to complete these questions and can select 'prefer not to say'.

1006

Usk Town Council

Bailey, Louise S.

From: clerk.usk@usktown.org
Sent: 17 December 2024 16:36
To: MCC - PlanningPolicy
Subject: Usk Town Council re RLDP

Dear Planning,

Usk Town Council voted against the RLDP Development for Burrium Gate site on 09.12.24

Public feedback shows residents are mostly against the proposed development of new houses at Burrium Gate. All councillors are for new housing in principle.
Councillors voted on their stance for new housing at Burrium Gate and gave reasons for and against:

Cllrs **for** RLDP at proposed site = **1**
Cllrs **against** RLDP at proposed site = **5**
Cllrs **abstaining** = **1**

Reasons For	Reasons Against
More housing for more people	MCC's proposal of 50/50 percent affordable homes and zero carbon would eat into any profit and viability of the scheme to such a degree that it's unlikely to be achievable and if it is it could be at the expense of other infrastructure that is required to support these homes.
Lack of affordable housing Need for starter homes in principle	An extra 40 homes will put extra burdens on resources in town that are already stretched. The town doesn't see enough public investment in roads, doctors, dentists, public transport, open spaces or schools
Firemen, local families, teachers would like to be settling in Usk. There will be a mix of starter homes and 3-bedroom houses. 1/3 will be shared ownership and 2/3 will be social rent	Other sites were not possible as have constraints and yet this site also has constraints. Is this the least bad option?
No other available sites	Concern that houses will not go to Usk people, that 'local' means it's a wider area within Southeast Wales. Housing association criteria on Home Search Portal stretches across all of Monmouthshire.
Work to be done in March to deal with run-off water	Flooding does so much damage to the town
MCC have assured that what is implemented in terms of drainage will be as it is (green field) or better	Priory Gardens and the Athletic Club have recently been affected by the flooding of the Olway Brook. There's so much building between Monmouth and Usk, affecting the Olway and it has no flow; the water has nowhere to go except out around the surrounding fields and onto roads.
Aging population has increased and working population has decreased	More houses, more concrete, more roadways will adversely impact on flooding
School would like to see more young families in the area.	The amount of money needed to be spent on drainage solutions will not be gained back from 40 houses.

Kind Regards,



Usk Town Clerk



1013

**Glamorgan Gwent Archaeological Trust
(GGAT)**



Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Our ref: RLDP/MON/JBHD

Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP15 1GA

27th November 2024

Dear Sir

**Re: Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033:
Deposit Plan Consultation; Integrated Sustainability Appraisal; Habitats
Regulations Assessment.**

Thank you for consulting us on these documents.

We note that Glamorgan Gwent Archaeological Trust is mentioned as archaeological advisors to Monmouthshire County Council; as of 1st April 2024, GGAT merged with the three other Welsh Archaeological Trusts to form Heneb: The Trust for Welsh Archaeology. Our remit as advisors remains unchanged, and as agreed in the Memorandum of Understanding with your Authority includes the historic environment, heritage management and buried archaeology. Within the new structure, we remain Glamorgan Gwent Archaeology, and your Authority still comes within our remit.

A change to the primary legislation regarding archaeology and the historic environment occurred on 4th November 2024 when the Historic Environment (Wales) Act 2023 came into force. This has consolidated the existing range of primary legislation, and the supporting cascade of Policy, Guidance, Advice and Best Practice advice will be updated as a result.

As we have noted in previous responses, archaeology and the historic environment is an important part of Monmouthshire's area, and includes statutorily designated historic assets formed by both areas and structures, as well as non-designated historic assets. The deposit plan notes the historic assets which are statutorily protected (the Internationally Designated World Heritage Sites: Blaenavon Industrial Landscape; 202 Scheduled Monuments 2,420 Listed Buildings, 48 Registered Parks and Garden and 3 Registered Historic Landscapes of Outstanding Historic Interest: Blaenavon; Lower Wye Valley; and the Gwent Levels). However, it must be noted that these are a small proportion of the sites recorded in the Historic Environment Record. There are currently 9221 Core records (sites, features, findspots, etc) and an additional 1784 Event records (archaeological interventions, for example, excavations, evaluations, watching briefs, building and structural recording). These are all considered non-designated historic assets. As part of the appropriate management of the historic environment in development processes in

PLANNING SERVICES
GWASANAETHAU CYNLINIO

Heneb is the trading name of

THE TRUST FOR WELSH
ARCHAEOLOGY

SA12 Business Centre,
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Baglan Energy Park. Port
Talbot
SA12 7BR

Heneb yw'r enw
masnachu

YMDDIRIEDOLAETH
ARCHAEOLEGOL CYMRU

Canolfan Fusnes SA12,
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01792 655208

planning@ggat.org.uk

www.heneb.org.uk

Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

The Trust is both a Limited Company (1198990) and a Registered Charity (504616)

Cyfeiriad cofrestredig: Tŷ Cornel, 6 Stryd Caerfyrddin, Llandeilo, Sir Gaerfyrddin SA19 6AE

Registered address: Corner House, 6 Carmarthen Street, Llandeilo, Carmarthenshire, SA19 6AE





Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Monmouthshire, there are 67 Historic Settlement areas, and 12 Archaeologically Sensitive Areas.

The range of the archaeological remains includes the large scale representation of minerals and metals exploitation, as well as prehistoric upland settlement patterns and information on isolated finds of all periods, all of which contribute to the distinctive heritage and current form of the area. These should not be seen as any constraint to development, planning land use change or non-planning land use change, but viewed with the Well-being of Future Generations (Wales) Act 2015, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.

The Integrated Sustainability Appraisal notes the legislative framework that the Plan needs to adhere to; and included are the well-being objectives; heritage is noted in Objective 16 under Well-being Goal 6, as noted archaeology and the historic environment contribute to a wide range of other Goals and Objectives. The assessed impact on the historic environment concerning the strategic growth options is inconclusive (paragraph 6.4.3), noting that there is little to differentiate between negative and positive impacts and outcomes. and that the impact will be dependent on scale and location of the proposed development. The ISA theme chapter (8) dealing more specifically with the historic environment and landscapes, notes, as we have previously stated, that all forms of planned activity will have an impact on the historic environment, including large scale infrastructure works of all types, with a minor negative outcome as the conclusion. The support of a range of Policies within the Plan reduces adverse impact on the historic environment and therefore should ensure compliance with Welsh Government Legislation and Policy.

There are extant more specific policies which include consideration of the impact on archaeology and the historic environment and will contribute to its protection. Policies HE1 and HE 2 relate to Conservation Areas and their management, HE3 to the Roman Town of Caerwent, limiting the location of development change to protect the finite archaeological resource. Policy LC2 – Blaenavon Industrial Landscape World Heritage Site details that change via development will be permitted in certain circumstances only where there would be no adverse impact and where change would have a positive outcome. Policy LC4 – Wye Valley National Landscape (AONB) this area includes a number of historic environment landscape areas as well as sites and features. Whilst all policies for development in land allocation may have an impact on archaeological remains and the historic environment, which will require mitigation, there are some policies that may have a more specific impact. Both Policy H4 – Conversion/Rehabilitation of Buildings in the Open Countryside for Residential Use and Policy H5 – Replacement Dwellings in the Countryside may have a direct impact on historic buildings, farmsteads and historic management of land and boundaries that may require mitigation, and this should be noted. Locations of growth options we have commented on previously regarding their impact on the historic environment.

The Habitats Regulations Assessment refers to the protected areas of the natural environment. The Historic Environment Record shows there are features and sites

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Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

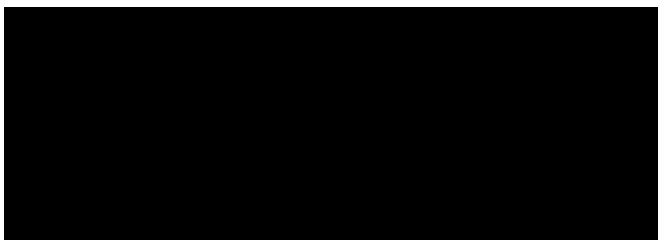
relating to the historic environment which are within the areas of importance to the natural environment, and these should be considered not in isolation from each other. For example, the Gwent Levels are a Registered Historic Landscape and include thousands of archaeological sites related to the reclamation of the land since the prehistoric period. Upland sites include evidence of prehistoric burial and ritual landscapes; wooded valleys include land and water management sites relating to the industrial growth of south Wales. The threats to the natural environment are those faced by the historic environment.

We have commented on the Candidate Sites submitted to recommend mitigation that may be necessary for some sites, due to the likely impact on the archaeological deposits from proposed development. It also should be taken into consideration that climate change, and the effects of climate change such as flooding, desiccation, leading to erosion and the impacts of other severe weather events have an impact on the historic environment. This includes fragile finite remains which are anaerobically preserved, and evidence of prehistoric and early historic activity which is contained in peats, and in pollen and seed remains.

The impact of balancing tourism and education regarding archaeology and the historic environment also needs to be considered from an impact viewpoint, where increased visitor numbers may have an adverse impact on remains. This is an issue being considered globally at the moment and can be mitigated where visits are limited by time, areas of access, and visitor tax. Clearly this also has impacts economically and on wellbeing, where outdoor walking and social prescribing, engaging with heritage and historic sites is being promoted.

If you have any questions or require further advice on this matter, please do not hesitate to contact us.

Yours faithfully



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1016

Chepstow Town Council

Archived: 10 March 2025 11:59:49

From: [REDACTED]

Mail received time: Fri, 3 Jan 2025 11:57:08

Sent: Fri, 3 Jan 2025 11:56:58

To: [MCC - PlanningPolicy](#)

Subject: Chepstow Town Council response to RLDP

Importance: Normal

Sensitivity: None

Good Morning

Unfortunately I have just found this response in my outbox having assumed that it had been sent following the Council's last meeting on 27.11.24. I would be really grateful if the comments can be included in the RLDP.

- Members are positive regarding the progressive development planning as proposed. However, major concerns were expressed about the infrastructure and the reluctance to approve the development without appropriate commitment to it, particularly until the well-known issues on High Beech roundabout are fully addressed.
- Discussion was largely in favour of Moun-ton Road and there was some reasonable support for development at Bayfield.

Kind regards



Tel: 01291 626370

Please note my working days: Monday – Thursday.

Chepstow Town Council



AMBITION INCLUSIVITY RESPECT GREEN

GDPR

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1056

Abergavenny Town Council

View results

Respondent

579

Anonymous

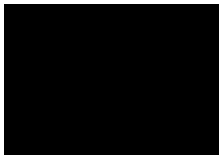
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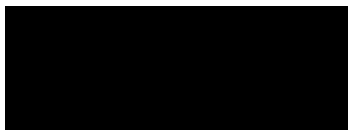
Part 1: Contact Details

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)

Abergavenny Town Council

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

ABERGAVENNY: We support the objective of 600 new homes in Abergavenny. We note that 500 of these new homes are intended for East Abergavenny. We are aware of numerous problems connected to this development, therefore we would strongly support the relocation of the A465, rather than working through the challenge of designing access across the A465 – gaining agreement of Welsh Government Trunk Road Agency and Network Rail.

We feel the inclusion of 50% affordable homes is admirable.

We recognise the need for more employment opportunities and note the allocation for B use class employment land, and would welcome the expansion of this further if the opportunity is available.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☒ Support

☐ Objection

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

ABERGAVENNY: It is essential that the town can offer sites and premises for new and expanding businesses.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

☒ Support

☐ Objection

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

ABERGAVENNY: We support the housing development for East Abergavenny, with reservation over the integration of this community with the town. The natural barrier of the A465 needs to be addressed - simply installing crossings will not be sufficient to encourage the development of a real community.

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

17. Would you like to comment on this question *

☒ Yes

☐ No

18. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENNY: GW1: We fully support the green wedge designation for Abergavenny.

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

20. Would you like to comment on this question *

- ☒ Yes
- ☐ No

21. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENNY: S3, PM1, PM2, PM3: We are currently in the consultation phase of creating a Placemaking Plan for the town. We hope to have this integrated to the wider plans for the county and support the policies within the RLDP which will enable the implementation of the projects that are identified.

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

23. Would you like to comment on this question *

☒ Yes

☐ No

24. Is your representation in support or objection? *

☒ Support

☐ Objection

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

ABERGAVENNY: Policy S4: We have two rivers - the Usk and Gavenny - which are defining characteristics of our town. It is essential to work towards restoring the health of these waterways, and we welcome the incorporation of water efficiency measures and minimising adverse impacts on water resources and quality.

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)

26. Would you like to comment on this question *

☒ Yes

☐ No

27. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENNY: We recognise that many of the activities in this area are provided by volunteers. In order to make sure this continues, there needs to be more encouragement and recruitment of interested parties to ensure we continue to protect and enhance the green spaces we have, as well as developing new areas for such uses as community growing initiatives.

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

29. 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)

30. Would you like to comment on this question *

- ☒ Yes
- ☐ No

31. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENTNY: Fully supportive of the affordable housing allocation for the sites in Abergavenny.

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

33. Would you like to comment on this question *

- ☒ Yes
- ☐ No

34. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENTNY: We support the allocation of 500 houses on the East Abergavenny site, but recognise that this will put additional strain on the primary schools and healthcare provisions in the town. We would like to see more around the inclusion of additional facilities to support the growth in population which this will bring, and more detail around the affect on local governance.

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

36. Would you like to comment on this question *

☐ Yes

☒ No

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☒ Support

☐ Objection

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

ABERGAVENNY: We would support the expansion of these allocations in Abergavenny which are essential for the creation of new job opportunities, particularly for the younger demographic.

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

40. Would you like to comment on this question *

☒ Yes

☐ No

41. Is your representation in support or objection? *

☒ Support

☐ Objection

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

This will be an essential part of our Placemaking Plan when it is completed.

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

43. Would you like to comment on this question *

☒ Yes

☐ No

44. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

ABERGAVENNY: S13: We welcome the promotion and prioritisation of Active Travel Routes for new developments. However, the current proposal to install crossings on the A465 to connect the proposed housing development for East Abergavenny is not sufficient. Special attention should be paid to connectivity between bus and rail, with facilities to enable the wider community to take full advantage of these facilities.

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

46. Would you like to comment on this question *

- ☒ Yes
- ☐ No

47. Is your representation in support or objection? *

- ☒ Support
- ☐ Objection

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

We await the results from the Placemaking Plan consultation currently underway for Abergavenny.

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

49. 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)

50. 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?

51. 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>

52. 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.

53. 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?

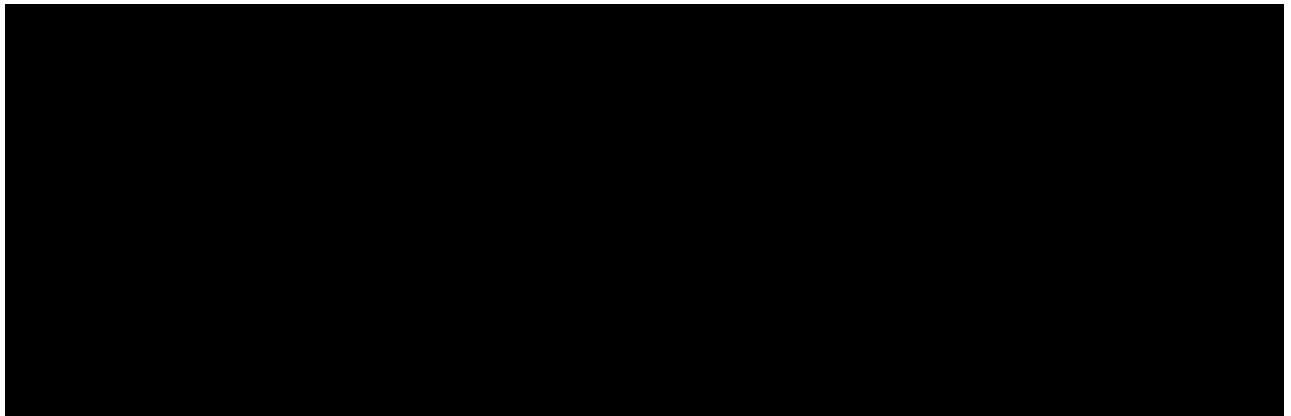
☐ Yes

☒ No

Part 5: Welsh Language

54. 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?

55. 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?



1106

Llanarth Fawr Community Council

View results

Respondent

421

Anonymous

12:41

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)

Llanarth Fawr Community Council

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

10. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

11. 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.

*

Object to the excessive level of housing growth, and to the 15% flexibility allowance.

Object to Policy S1: The housing target of 5,400 – 6,210 homes over the Plan period 2018 – 2033 is excessive, and is exacerbated by the 15% flexibility allowance. It includes approximately 4,080 homes in the existing landbank, so new sites are allocated for approximately 1,320 – 2,130 new homes. The Welsh Government letter of 27 August 2021 to MCC stated that the proposed level of housing growth should “be no greater than 4,275 units ... plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.” [REDACTED] etc. wrote to all MCC members on 22 September 2021 stating that the WG “letter’s prescribed maximum of 4,275 homes plus 10% flexibility ... result in a Plan with no new housing allocations.” The fact that the housing figure in the Preferred Strategy, carried forward into the DRLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, does not alter the fact that WG’s 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales.

Indeed, the later letter reiterated WG’s stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the DRLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

The objection to 5,400 – 6210 homes is that a target of 4,275 homes would reduce the pressure on Minor Villages.

Regarding soundness, there is also objection to the DRLDP’s preparation process; the Delivery Agreement which accompanied the consultation draft Preferred Strategy was agreed by the Council on 1 December 2022 and committed MCC to gain endorsement of the Preferred Strategy and its housing target before the DRLDP was prepared. This Delivery Agreement requirement was not complied with, as set down in Part 3 to this Representation Form.

Do you have any comments on the Plan’s Spatial Strategy ...? (Policy S2)

Yes

Object to the new definition of allowing “infill between existing buildings” in Tier 4 settlements such as Bettws Newydd, Great Oak, and Llanarth.

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

13. Is your representation in support or objection? *

☐ Support

☒ Objection

14. 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.

*

Object to the new definition of allowing "infill between existing buildings" in Tier 4 settlements such as Bettws Newydd, Great Oak, and Llanarth.

The Settlement Hierarchy is said in para 6.4.3 to reflect the findings of the Sustainable Settlement Appraisal, but no such appraisal was undertaken for Tier 4 settlements, see below objection regarding Minor Villages and the change in 'infill' policy.

Object to Policy S2 regarding Minor Villages: Policy S2 is also objected to because it changes the definition of minor infilling in Tier 4 Minor Villages (which include Bettws Newydd, Great Oak and Llanarth) from that contained in the current adopted LDP. The current LDP Policy S2 states "small scale residential development will be allowed in the circumstances set out in Policy H3" which in turn refers to the "filling of a small gap between existing dwellings". The new Policy S2 wording refers to "minor infilling between existing buildings". Bearing in mind the number of buildings rather than dwellings that exist in the vicinity of Minor Villages, and the propensity for new buildings to be erected (perhaps using permitted development rights) thereby creating more 'existing buildings' and therefore more residential infill opportunities, and it is easy to see that Minor Villages could become the focus of significant residential development pressures. This would fly in the face of their Minor Village status which reflects their unsustainability in terms of their lack of public transport, facilities, infrastructure etc.

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

15. 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)

16. 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)

17. 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)

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. 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)

20. Would you like to comment on this question *

☒ Yes

☐ No

21. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

Object to Policy H3 and H9: Compounding the objection to the wording of Policy S2, Policy H3 goes even further by stating: "...planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings ... subject to detailed planning considerations ...". To add to the excessive development opportunities allowed by Policy H3, para 12.4.1 also allows "... for the possibility of affordable housing on exception sites, i.e. sites where development would not be allowed other than to provide affordable housing." The affordable exception sites for tier 4 settlements according to Policy H9 will be for "5 homes or less". It would be contrary to the DRLDP's sustainability principles to allow such significant new housing development in settlements such as Bettws Newydd, Great Oak and Llanarth. Object to Paragraph 15.1.2: The wording of the reference to four pitches at Llancayo should be changed to: "The resolution by the Planning Committee on 16th July 2024 to approve a further four pitches at Llancayo would reduce the overall pitch requirement if the pitches prove capable of implementation."

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

23. 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)**

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☐ Yes

☒ No

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

28. Would you like to comment on this question *

☐ Yes

☒ No

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

29. Would you like to comment on this question *

☐ Yes

☒ No

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

30. Would you like to comment on this question *

☐ Yes

☒ No

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

31. Would you like to comment on this question *

☒ Yes

☐ No

32. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Object to the Sustainable Settlements Appraisal: The appraisal failed to evaluate Tier 4 settlements despite the changes to Policy H3 which will direct significantly increased development pressures towards Minor Villages.

Part 3: Tests of Soundness

Please refer to the notes at the for further

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

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

☐ Yes

☒ No

35. 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)?

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

The DRLDP is not considered sound as it fails legal and regulatory procedural requirements. MCC has contravened its Delivery Agreement/Community Involvement Scheme. The Council committed to a Delivery Agreement/Community Involvement Scheme that commendably but voluntarily embraced a scheme of public consultation summarised in the Officer Report of 1st December 2022 at its 3.28 that: "Statutory consultation/engagement will take place over an eight-week period in December 2022 - January 23 ... Following the stakeholder involvement, engagement and consultation on the Preferred Strategy, responses will be collated and carefully considered. A consultation report will be prepared and published containing details of the representations and the Council's response to them. A summary consultation report and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy." The Council has contravened its own Delivery Agreement/Community Involvement Scheme, and thereby contravened the 2005 (2015) Regulations and the Planning and Compulsory Purchase Act 2004 63 - (1). The Preferred Strategy housing target is the single most important element of the DRLDP and Members were denied the chance to consider it in the light of representations received before the Deposit Version was prepared.

The DRLDP is not considered sound because it fails Test 1 in that its excessive level of housing growth is not in general conformity with the South East Wales regional housing apportionment in Future Wales: the National Plan 2040. The DRLDP unsustainably directs too much development away from the National Growth Area which is Cardiff, Newport and the Valleys. The Welsh Government letter to MCC of 27 August 2021 required a level of housing growth no greater than 4,275 units plus an appropriate flexibility allowance: "This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales." The fact that the housing figure in the Preferred Strategy, carried forward into the DRLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales. Indeed, the later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the DRLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

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.

37. 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

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

☐ Welsh

☒ English

Part 5: Welsh Language

39. 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?

40. 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?



1136

Portskewett Community Council

[View results](#)

Respondent

255

Anonymous

208:05

Time to complete

Part 1: Contact Details

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

1. Title *

2. Name *

3. Job Title (where relevant)

4. Organisation (where relevant)

Portskewett Community Council

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.

*

Policy H1 – Residential Development in Primary and Secondary Settlements

Councillors have raised serious concerns in respect of the proposed Caldicot East development as detailed below, many of these concerns have also been raised with the Council by Portskewett residents:

The location and size of the proposed development is akin to that of a new settlement, being a 116% increase on the current number of households in Portskewett Village. It is not therefore seen by councillors or residents as an extension of an existing settlement and plans should therefore not only provide for the necessary infrastructure to support it as such, but steps must be taken to ensure that the infrastructure is actually put in place should the development be approved.

The proposed development is located within the Portskewett boundary, and this should be recognised in the name by which it is referred to. By referring to the development as Caldicot East it implies that the development would lie within Caldicot, which is not the case. As Portskewett does not have the infrastructure to support a development of this size it is important that the location is identified correctly.

Access to services and facilities in the immediate and wider locality is not sufficient to support a development of this size. Doctors and dentists in the area are already oversubscribed, and access to NHS dental services is severely lacking. Portskewett has only one shop, there is no post office, there is no bank in the neighbouring town of Caldicot and leisure facilities in the area are also lacking, therefore access to basic services is very limited, especially as public transport provision in the community is poor.

Portskewett is, and has historically been, a rural community. The location of the proposed development would result in the loss of valuable agricultural land, which could not be replaced. A development of this size, which would more than double the size of the village in which it would be located, would conceivably result in the intrinsic nature of the community being lost.

The areas adjacent to the Nedern brook are known to flood regularly in bad weather, and this has worsened in recent years as a consequence of other developments being built. Another large development in the proposed location would only exacerbate the problem further.

The proposed development site also straddles Crick Road, which is a well used traffic route for a variety of vehicles, including large articulated lorries. Vehicle movements would increase as a result of the development and the installation of a pedestrian walkway would require the removal of established hedgerows, which is prohibited in many situations, but if permitted would be detrimental to the environment.

Although a new school is proposed which would encompass pupils from Portskewett and Sudbrook, there is no safe route to the proposed location, which lies on the opposite site of the B4245 to the existing settlement.

Conversely there are no existing safe routes to Portskewett Village, or other settlements in the locality, which would serve the proposed development site, and the proposed site is not on a public transport route. Integration of the development into the community would be hampered by this and it is plausible that it would become an independent settlement as a result, but without the infrastructure that would be necessary to support it.

Whilst the Council appreciates it is necessary to meet housing needs, especially those for affordable housing, which it is proposed would account for 50% of the development, the suggested location would not appear to be advantageous for potential residents for the reasons outlined above, and therefore the Council believes an alternative site should be found, which would provide access to the services and facilities needed to support a development of this size.

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

11. Would you like to comment on this question *

☐ Yes

☒ No

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

12. Would you like to comment on this question *

☐ Yes

☒ No

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

13. Would you like to comment on this question *

☐ Yes

☒ No

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

16. Would you like to comment on this question *

☐ Yes

☒ No

Do you have any comments on the infrastructure 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

20. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

HA2 Land to the East of Caldicot/North of Portskewett

Councillors have raised serious concerns in respect of the proposed Caldicot East development as detailed below, many of these concerns have also been raised with the Council by Portskewett residents:

The location and size of the proposed development is akin to that of a new settlement, being a 116% increase on the current number of households in Portskewett Village. It is not therefore seen by councillors or residents as an extension of an existing settlement and plans should therefore not only provide for the necessary infrastructure to support it as such, but steps must be taken to ensure that the infrastructure is actually put in place should the development be approved.

The proposed development is located within the Portskewett boundary, and this should be recognised in the name by which it is referred to. By referring to the development as Caldicot East it implies that the development would lie within Caldicot, which is not the case. As Portskewett does not have the infrastructure to support a development of this size it is important that the location is identified correctly.

Access to services and facilities in the immediate and wider locality is not sufficient to support a development of this size. Doctors and dentists in the area are already oversubscribed, and access to NHS dental services is severely lacking. Portskewett has only one shop, there is no post office, there is no bank in the neighbouring town of Caldicot and leisure facilities in the area are also lacking, therefore access to basic services is very limited, especially as public transport provision in the community is poor.

Portskewett is, and has historically been, a rural community. The location of the proposed development would result in the loss of valuable agricultural land, which could not be replaced. A development of this size, which would more than double the size of the village in which it would be located, would conceivably result in the intrinsic nature of the community being lost.

The areas adjacent to the Nedern brook are known to flood regularly in bad weather, and this has worsened in recent years as a consequence of other developments being built. Another large development in the proposed location would only exacerbate the problem further.

The proposed development site also straddles Crick Road, which is a well used traffic route for a variety of vehicles, including large articulated lorries. Vehicle movements would increase as a result of the development and the installation of a pedestrian walkway would require the removal of established hedgerows, which is prohibited in many situations, but if permitted would be detrimental to the environment.

Although a new school is proposed which would encompass pupils from Portskewett and Sudbrook, there is no safe route to the proposed location, which lies on the opposite site of the B4245 to the existing settlement.

Conversely there are no existing safe routes to Portskewett Village, or other settlements in the locality, which would serve the proposed development site, and the proposed site is not on a public transport route. Integration of the development into the community would be hampered by this and it is plausible that it would become an independent settlement as a result, but without the infrastructure that would be necessary to support it.

Whilst the Council appreciates it is necessary to meet housing needs, especially those for affordable housing, which it is proposed would account for 50% of the development, the suggested location would not appear to be advantageous for potential residents for the reasons outlined above, and therefore the Council believes an alternative site should be found, which would provide access to the services and facilities needed to support a development of this size.

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. 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)

27. 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)

28. 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?

29. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

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

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

☐ Yes

☒ No

31. 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)?

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

The plan does not appear appropriate for all localities within the area. Proposals for localities that are not seen to be appropriate need to be reviewed.

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.

33. 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?

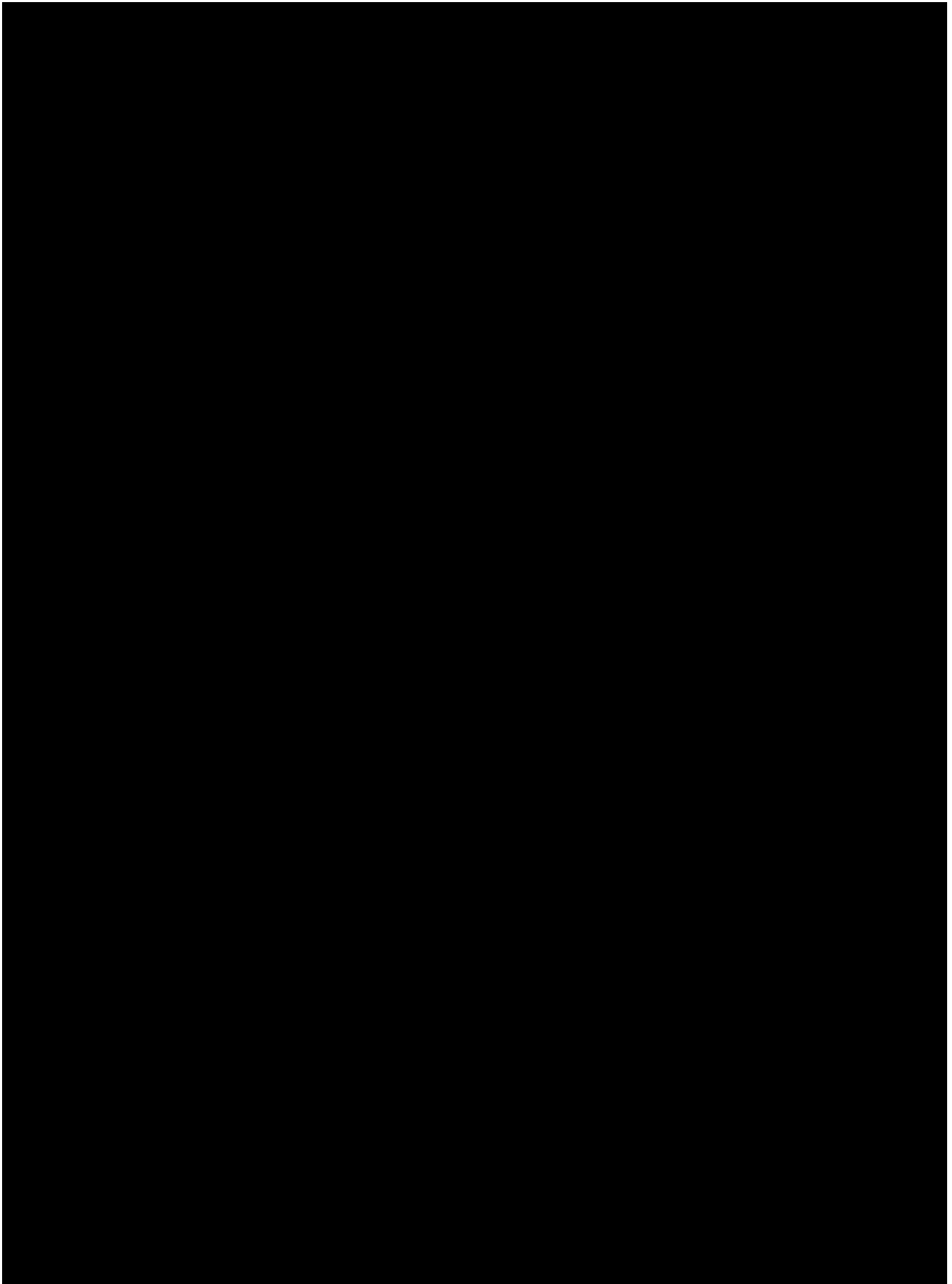
☐ Yes

☒ No

Part 5: Welsh Language

34. 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?

35. 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?



1138

Raglan Community Council



**Office
Use Only**
Representor
Number

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.....

Monmouthshire Deposit Plan Representation Form

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

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

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

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

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

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

Part 1: Contact Details Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

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



Part 2: Your Representation

Office
Use Only
Represent
tor
Number
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.....
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1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Is your representation in support or objection?

Support:

Objection:

Yes

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

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

Raglan Community Council would like the proposed RDLP to be changed to support the community of Raglan and wider community.

Members of Raglan Community Council are supportive of small-scale development to support young families to remain in the community, but object to the proposed medium / large scale developments included in the proposed Deposit RLDP.

General Note:

Raglan Community Council engaged with residents in an open meeting for Raglan and surrounding communities to express their observations. Following that engagement the Community Council received a number of emails with observations, which are attached as an appendix.



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

Is your representation in support or objection?

Support:

Objection:

Yes

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

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

Raglan Community Council object to the excessive level of housing growth, and to the 15% flexibility allowance.

Object to Policy S1:

Raglan Community Council believes the housing target of 5,400 – 6,210 homes over the Plan period 2018 – 2033 is excessive.

Set out in Monmouthshire County Council Replacement Local Development Plan (RLDP) amended in October 2024, para 6.2.3. states: "*This level of growth is in general conformity with Future Wales's overall strategy. Although Monmouthshire is not within the National Growth Area identified in Future Wales 2040, our evidence shows that the identified level of growth is essential to deliver our local evidence-based issues and objectives and ensure the RLDP is sound. It is supported by Future Wales policies 3, 4, 5 and 7, which support public leadership and the use of public land to deliver on ambitious affordable housing targets, demographically balanced rural communities, the rural economy and the delivery of affordable homes. The RLDP Growth Strategy will assist in addressing our core issues without harming or compromising Welsh Government's objectives for the wider South East Wales region*".

The RLDP includes approximately 4,080 homes in the existing landbank, so new sites are allocated for approximately 1,320 – 2,130 new homes.

Included in correspondence from a Welsh Government (WG) letter of 27 August 2021 to Monmouthshire County Council it stated that the proposed level of housing growth should "be no greater than 4,275 units plus an appropriate flexibility allowance.



This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales. The former Head of Placemaking at Monmouthshire County Council, wrote to all Monmouthshire County Council Elected Members on 22 September 2021 stating that the WG letter's "prescribed maximum of 4,275 homes plus 10% flexibility, resulting in a Plan with no new housing allocations"

Therefore, the housing figures in the Preferred Strategy, carried forward into the RLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, and does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales.

The later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes.

Objectors have criticised the absence of credible viable technical data to evidence that 50% affordable housing will be delivered. Without guaranteed delivery of 50% affordable housing, there is no justification for the RLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

Objection:

The Community Council are objecting to the 5,400 – 6210 homes. A target of 4,275 homes would remove the need for new housing allocations in Raglan and the other secondary settlements set out in the RLDP.

The candidate site South of Monmouth Road, Raglan (CS0183) is unnecessary, and its impact on the environment and its sustainability could harm the community and increase flooding within the wider community of Raglan, which can be avoided by excluding this proposed site from the RLDP.



The "*Candidate Site Assessment Report*" states that the proposed candidate site (CS0183) has been reduced in area/size, (from 111 dwellings to 54) compared to the candidate sites submission proposed for allocation in the RLDP.

The Planning Authority has indicated that the site performs well against the site search sequence with good access to local amenities and no fundamental constraints have been identified. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 54 dwellings.

Raglan Community Council along with residents of Raglan are concerned if this proposed site is included in the RLDP there is going to be far more road safety matters through the highstreet in Raglan, along with the increased use of the Interchange Junction on the A40.

WG and their agents have undertaken a Safety Study on this section of the A40 in Raglan. The Safety Study indicated that there were 73 traffic movements from Monmouth Road during the peak times, and 613 traffic movements in any 12-hour period of the survey. The traffic movements totalled 13,500 in any one day.

Due to the inclusion of the Candidate site (CS0183) it would increase the traffic movements and increase the safety issues.

The Planning Authority issued consent to Planning Application DM/2023/01019 for 21 dwellings, therefore automatically increasing the traffic movements through the village and the Interchange Junction.

Included in Policy S1, the 15% flexibility allowance is unjustified:

Justification for the 15% flexibility allowance is provided in the Housing Background Paper October 2024 and includes the statement at para 3.3 that:

"it ensures the strategic sites ... are sufficiently large..." and will "...result in the Plan being able to provide a range and choice of sites..." etc.



This would lead to over-allocation of sites that could/would lead to developers cherry-picking. Therefore, more sites will be developed than are justified by already excessive housing targets, the most difficult to develop sites will be left to last, and the most marketable sites, in villages such as Raglan, will be developed first, adding to pressure on Raglan infrastructure.

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

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

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

Raglan Community Council Objects:

- Raglan Community Council objects to the proposed level of the growth in Raglan as a secondary settlement in Policy S2

The proposal will result in excessive housing targets and flexibility allowance as set out in Policy S1;

- Raglan Community Council object to the excessive total of 6.05 ha employment growth because 4.5ha is allocated to Raglan;
- Raglan Community Council object to the new definition of allowing "infill between existing buildings" in tier 4 settlements such as Gwehelog and Llandenny.

Raglan Community Council Object to Policy S2 regarding Raglan village:



Raglan Community Council object to para 6.4.1 Strategic Policy S2 set out in the RLDP Spatial Strategy.

The overall 350 figure for Raglan, Usk and Penperlleni is 'indicative', and the figure is not apportioned between the three Tier 2 settlements, as referred to in para 6.4.4 which states that *"Where growth cannot be met in an individual settlement, development will be directed toward a same tier or higher tier settlement within the same Housing Market Area."*

Raglan, is a Tier 2 settlement. Raglan, Penperlleni and Usk are all in the same tier and implausibly within the Chepstow Housing Market Area (for decades, Raglan has been in the Monmouth Housing Market Area). Raglan Community Council must express concern if Usk and Penperlleni as Tier 2 settlements have difficulties accommodating their allocated level of housing growth could this see the housing allocation redirected to Raglan.

Monmouthshire County Council, Planning Committee refused a Planning Application and the applicant and its agents appealed the decision. The inspector indicated *'This would be unsustainable, (see the Inspector's Hearing Decision of 2019 on the Raglan 111 proposal by Richborough Estates APP/E6840/V/18/3218503) and contrary to the RLDP strategy of sustainable growth: the phrase in para 6.4.4 "towards a same tier"*

Settlement Boundary Review;

Raglan Community Council object to the Raglan Enterprise Park candidate site (CS0069) Employment (B1) and Renewable Energy (Solar). It would appear that this site is not included within the boundary. The boundary follows the Nant-y-Wilcae brook. It would seem that the boundary is different on different documents. It would seem to be outside the Settlement on page 27 in the Boundary Review published and page 92 in the Raglan-combined-2023 document.

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

	Support:	
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Is your representation in support or objection?	Objection:	Yes
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. The Settlement Hierarchy reflects in para 6.4.3 the findings of the Sustainable Settlement Appraisal, but no such appraisal was undertaken for Tier 4 settlements, see below objection regarding Minor Villages and the change in 'infill' policy.		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	Yes
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. <u>Policy H3 and H9</u> <u>Raglan Community Council Object to Policy H3 and H9:</u> Raglan Community Council object to the wording of Policy S2, Policy H3 which goes even further by stating:		



"...planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings ... subject to detailed planning considerations ...".

To add to the excessive development opportunities allowed by Policy H3, para 12.4.1 also allows "for the possibility of affordable housing on exception sites, i.e. sites where development would not be allowed other than to provide affordable housing."

The affordable exception sites for tier 4 settlements according to Policy H9 will be for "5 homes or less". Consideration needs to be taken into account relating to windfall/infill sites in tier 4 settlements. The RLDP does not take into account the lack of infrastructure and community facilities including matters relating to residents travelling for work, social and domestic pleasure to and from those proposed windfall or infill sites.

It would be contrary to the RLDP's sustainability principles to allow such significant new housing development in settlements such as Gwehelog and Llandenny and other small hamlets in Raglan surrounding communities.

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

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

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

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

Climate Change

Raglan Community Council object to Strategic Policy S4 – Climate Change

The policy relating to provision of ULEV charging infrastructure must be provided to every dwelling.



The policy indicates that Monmouthshire County Council are committed in providing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality;

The RDLP doesn't seem to have taken into account the charging infrastructure. This RDLP doesn't seem to take into account the policy the Government has set out about Net Zero Carbon use.

Currently the RLDP do not demonstrate how the infrastructure will support the policy, when the LPA seems to have omitted charging infrastructure from the policy document intending to reduce emissions and improve air quality inline with Government policies.

Drainage:

Under Policy S4 contained in the Development Management Policy document, Monmouthshire County Council indicates that the Sustainable Drainage should be functioning effectively. It would seem to be unclear as this document and the Infrastructure Delivery Plan Background Paper October 2024 states that "DCWW note there are no issues with water supply network or foul flows being accommodated for this site at the Raglan WwTW".

It would seem this policy statement and the current information from the LPA has indicted that DCWW doesn't have any concerns, but its clear with the budget restraints on both organisations don't have the financial resource to upgrade or provide an updated infrastructure system. The proposed candidate site South of Monmouth Road, Raglan (CS0183) without infrastructure updates is going to have a detrimental effect on other dwellings in Raglan.

To support Raglan Community Council observations relating to infrastructure upgrades and the potential flooding, contained in the appendix to this section several photographs have been included as an example of the flood that occurred in November 2024.

Section 3.1.7 states that land which is designated as Best and Most Versatile cannot be avoided for development.

Key consideration in assessing the Candidate Sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy; all four of our primary settlements are surrounded by BMV



agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy.

Under Climate Change Policy S4 the document says development should be avoided in areas at risk of flooding. Developing the candidate site

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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

Yes

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

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

Water quality in Riverine Special Areas of Conservation (SAC) "18 A plan of the catchment area of the Rivers Usk and Wye can be found on the Council's website"

The following section within the Monmouthshire RLDP indicates that Natural Resources Wales (NRW) have been consulted. Residents of Raglan witnessed extreme levels of



rainwater and local flooding at the lower areas of the community, following the excessive rain fall in the months of November and December 2024.

It's clear the targets NRW have set have been mis calculated therefore failing to meet the required target. Therefore, this will have an impact on Raglan and the wider community.

3.1.3

Following recent evidence about the environmental impacts of phosphates in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for river water quality and has assessed the nine riverine Special Areas of Conservation in Wales. Within Monmouthshire, it was identified that 88% and 67% of the River Usk and River Wye water bodies respectively failed to meet the required target.

3.1.7

A key consideration in assessing the Candidate Sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy: all four of our primary settlements are surrounded by BMV agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy.

Under Climate Change Policy S4

The document says development should be avoided in areas at risk of flooding.

It's noted from current Planning Applications, DCWW has major issues managing ground water and foul water to their treatment plant and water courses in Raglan. It can be said that due to the lack of infrastructure in the past, there is no evidence that DCWW have shown commitment to *Policy CC1 Sustainable Drainage Systems* and the investment in substantial infrastructure improvements.

Currently ground water and surface water is a major issue in Raglan. The two brooks in Raglan (Nant-y-Wilcae and Barton Brook) take a lot of the ground water from high rainfall which has been witnessed, but due to the amounts of rainfall the brooks do not have sufficient capacity, which has led to flooding, to low-lying areas in Raglan village and other parts of the Community Councils area. With the forecasted increase in global warming this is only likely to increase in the future and have a detrimental effect on residents of Raglan and the wider community.



Regarding the proposed Candidate site Land West of Raglan (CS0278) Employment, if this site is included in the RLDP, this will have a detrimental impact on the management of ground and surface water. There will be an increase in ground and surface water due to the large roof areas and the hard landscaping to and around the proposed buildings.

The brook (Nant-y-Wilcae) will be overwhelmed with ground water thus having an impact on land and properties east of the village. The view in Raglan of an expanded industrial area on land that is currently farm land is not acceptable. The land currently used as the industrial site could be expanded.

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

Is your representation in support or objection?

Support:

Objection:

Yes

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

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

Raglan Community Council object to

Policy H3 and H9:

Concern must be expressed and supporting the objection to the wording of Policy S2, and Policy H3 goes even further by stating:

"...planning permission will be granted for minor small scale rounding off or infilling of a small gap between existing buildings ... subject to detailed planning considerations ...".

To add to the excessive development opportunities allowed by Policy H3, para 12.4.1 also allows



"... for the possibility of affordable housing on exception sites, i.e. sites where development would not be allowed other than to provide affordable housing."

Raglan Community Council would like make the following comment. The affordable exception sites for Tier 4 settlements according to Policy H9 will be for "5 homes or less". That would appear to be contrary to the RLDP's sustainability principles to allow such significant new housing development in settlements such as Gwehelog and Llandenny and Llandenny Walks.

Raglan also have other small hamlets (Kingcoed, Coldharbour), that have not been included in these policies.

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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

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

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



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

Is your representation in support or
objection?

Support:

Objection:

Yes

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

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

Policy EA1 – Employment Allocations: Site EA1

Raglan Community Council Object to Policy EA1

Employment Allocations: Site EA1, Candidate site Land west of Raglan (CS0278), 4.5ha for use classes B1, B2 and B8 is objected to.

Raglan Community Council object to this candidate site on the following grounds. The site would comprise of visually prominent large buildings (sheds), and the surface / ground water would exacerbate the risk of flooding to dwellings downstream (Nant-y-Wilcae).

With a candidate site of this size, it would have a visual impact due to light pollution, on properties that are on the opposite side of Usk Road.

The RLDP para 2.1.10 Raglan and wider community has a significantly higher proportion of older age groups (65+) and a lower proportion of young adults (16-44) compared to the Welsh average. The proportion of our population aged 65+ and 85+ is increasing well in excess of the Welsh average.

The 2021 Census shows that the population aged 65+ has increased by 26% since 2011, which compares to a Welsh average of 18%. For the Monmouthshire as a whole, the 2021 Census identifies that nearly 26% of the population is over 65 (compared to 21% in Wales) Therefore, this would call into doubt if this candidate site Land west of Raglan (CS0278 of this size is required.



The Monmouthshire County Council assessment on page 206/207 notes the damage to high quality agricultural land and on the setting and landscape of Raglan village, but concludes the site's "allocation will provide much needed employment land in Raglan and the wider County reflecting Raglan's location and its access to other settlements."

This is no justification at all, and suggests that Monmouthshire County Council have longer term aspirations for the growth of Raglan village which would be utterly contrary to the Inspector's decision on Planning Application DM/2018/01050 for 111 houses (proposal mentioned above and rejected on sustainability grounds.) Site EA1, if developed, would result in visually prominent large sheds, and the run-off would exacerbate flooding risks for downstream residents. The site's development would also set the precedent for northward extension towards the A40 and its roundabout.

Raglan Community Council would support the extension of the existing Employment Site on Clytha Road, and Pen-y-Parc Road, Raglan. This site has all the relevant infrastructure to support areas of employment.

Raglan Community Council would also support Raglan Country Estate, Candidate Site (CS0281) Tourism/Leisure/ Commercial (A1/A3/C1/D1/D2 /Sui Generis).

The Community Council understand that this site was withdrawn from stage three, but this Candidate site has access directly onto the A449/A40 with some access/egress from the site.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



Object to Policy C14

Areas of Amenity Importance (AAI).

The policy states "Areas of Amenity Importance are identified on the Proposals Map. Development proposals that lead to the loss of Areas of Amenity Importance will not be permitted."

The deletion of the AAI in Raglan north of Monmouth Road is objected to. It is deleted simply on the basis that the AAI Review (October 2024) states at para 1.6: "Other spaces that are privately owned and not accessible to the public have also been excluded from AAI, this includes areas classified as garden curtilage and private grounds/paddocks. Some of these spaces were previously designated in the adopted Local Development Plan (2014) but it is not considered appropriate to roll these forwards."

The AAI review provides no justification for the exclusion of privately owned areas that, in the case of the deleted Raglan AAI, was designated because of its openness, amenity value and importance to the Conservation Area and the views and links between the Castle and its Parkland south of Monmouth Road, an importance upheld by numerous Planning Inspectors.

The AAI does not have recreational value, and has no need for public access. The only justification given is that the Raglan AAI site is "*Private, not accessible, therefore cannot be designated as AAI*". To hide such an important and unjustified policy decision in a background paper also calls into question the process for the RLDP's preparation and therefore its soundness.

It should be noted that the Planning Committee's resolution to grant planning permission for 21 houses (DM/2023/01019) was justified by officers in their report to the meeting on 3 December 2024 and was based on their concluding allegation that "Public open areas within the site mean that the important historic view of the castle will be retained and therefore there will be no adverse impact on land designated as an Area of Amenity Importance."



Although the presenting officer did comment to members that the AAI designation was deleted in the consultation RLDP, the implication of the officer's conclusion is that the AAI designation could remain despite the 21 houses, implausible as this may seem.

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

Is your representation in support or objection?

Support:

Objection:

Yes

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

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

Policy W3

Raglan Community Council object to Policy W3 which identifies W3a, 1.5 ha, Raglan Enterprise Park and W3b, 4.5 ha, Land West of Raglan, as both having potential for the location of in-building waste management facilities. Waste management will add to the impact of the traffic and will erode the quality of the existing and proposed employment sites.

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

Is your representation in support or objection?

Support:

Objection:

Yes

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

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



Areas of Amenity Importance Review

Raglan Community Council object to the Areas of Amenity Importance Review (AAI):

The deletion of the AAI in Raglan north of Monmouth Road is objected to.

It is deleted simply on the basis that the AAI Review (October 2024) states at its para 1.6: *"Other spaces that are privately owned and not accessible to the public have also been excluded from AAI, this includes areas classified as garden curtilage and private grounds/paddocks. Some of these spaces were previously designated in the adopted Local Development Plan (2014) but it is not considered appropriate to roll these forwards."*

The AAI review provides no justification for the exclusion of privately owned areas that, in the case of the deleted Raglan AAI, was designated because of its openness, amenity value and importance to the Conservation Area and the views and links between the castle and its parkland south of Monmouth Road; an importance upheld by numerous Planning Inspectors.

The AAI does not have recreational value, and has no need for public access. Indeed, the only justification given is that the Raglan AAI site is "Private, not accessible, therefore cannot be designated as AAI".

To hide such an important and unjustified policy decision in a background also calls into question the process for the RLDP's preparation and therefore its soundness.

Here it should be noted that the Planning Committee's resolution to grant planning permission for 21 houses (DM/2023/01019) was justified by officers in their report to the meeting on 3 December 2024 and was based on their concluding allegation that:

"Public open areas within the site mean that the important historic view of the castle will be retained and therefore there will be no adverse impact on land designated as an Area of Amenity Importance."



Although the presenting officer did comment to members that the AAI designation was deleted in the consultation RLDP, the implication of the officer's conclusion is that the AAI designation could remain despite the 21 houses, implausible as this may seem.

Sustainable Settlements Appraisal:

Raglan Community Council object to the Sustainable Settlements Appraisal: The appraisal failed to evaluate Tier 4 settlements despite the changes to Policy H3 which will direct significantly increased development pressures towards Minor Villages.

Housing Background Paper:

Raglan Community Council object to the Housing Background Paper:

The section entitled Housing Potential Study and its Appendix 1 should not have included the Area of Amenity Importance north of Monmouth Road, Raglan.

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

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



Soundness:

Raglan Community Council wish to object on the soundness, relating to the RLDP's preparation process;

- The Delivery Agreement which accompanied the consultation draft Preferred Strategy was agreed by the Council on 1 December 2022 and committed MCC to gain endorsement of the Preferred Strategy and its housing target before the RLDP was prepared.
- The Delivery Agreement requirement was not complied with, as set down in Part 3 of this Representation Form.
- Monmouthshire County Council has contravened its Delivery Agreement/Community Involvement Scheme. Monmouthshire County Council committed to a Delivery Agreement/Community Involvement Scheme that commendably but voluntarily embraced a scheme of public consultation summarised in the Officer's Report of 1st December 2022. "Statutory consultation/engagement will take place over an eight-week period in December 2022 - January 2023. Following the stakeholder involvement, engagement and consultation on the Preferred Strategy, responses will be collated and carefully considered.
- A consultation report will be prepared and published containing details of the representations and Monmouthshire County Council response to them. A summary consultation report and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy.
- Monmouthshire County Council has contravened its own Delivery Agreement/Community Involvement Scheme, and thereby contravened the 2005 (2015) Regulations and the Planning and Compulsory Purchase Act 2004 63 - (1). The Preferred Strategy housing target is the single most important element of the RLDP and Members were denied the chance to consider it in the light of representations received before the Deposit Version was prepared.



The Settlement Hierarchy

- The Settlement Hierarchy as indicated in para 6.4.3 was to reflect the findings of the Sustainable Settlement Appraisal, but no such appraisal was undertaken for Tier 4 settlements. See below objection regarding Minor Villages and the change in 'infill' policy.

Report to Monmouthshire County Council, council members.

- The importance of the Preferred Strategy (PS) in the RLDP process was not disputed as the PS, when agreed, will set the housing target for the RLDP Deposit Plan, and from my participation in the Monmouthshire County Council LDP Examination.
- Raglan Community Council are led to believe in 2013 and the current LDP's adoption in 2014 that the PS target is not deviated from without good reason. Effectively therefore, once the RLDP PS housing target is agreed, the Deposit Plan and its examination will be concerned only with where the housing sites are rather than the key question of whether the total amount of proposed housing is needed and justified.
- Given the importance of the PS, it should be noted that endorsement by Monmouthshire County Council members on 1 Dec 2022 was only for consultation purposes; the PS stage being the first statutory public consultation stage.
- The Officer Report stated: "*Statutory consultation/engagement will take place over an eight-week period in December 2022 - January 2023 ... Following the stakeholder involvement, engagement and consultation on the PS, responses will be collated and carefully considered. A consultation report will be prepared and published containing details of the representations and the Council's response to them. A summary consultation report and the PS with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the PS.*"
- The Officer's Report to Council on 26 Oct 2023 (the delayed 'Spring 2023' meeting) and its appended '*Summary of representations received in response to the PS 2022 consultation*' made no attempt at presenting '*the Council's response*' to the



representations received, and therefore cannot be described as a 'consultation report'.

- The 26 Oct 2023 the Officers Report unarguably failed to inform Members of "*the Council's response*" to nearly all of the representations received.

The RLDP is not considered soundness:

The RLDP fails Test 1 in that its excessive level of housing growth is not in general conformity with the South East Wales regional housing apportionment in Future Wales.

The National Plan 2040. The RLDP unsustainably directs too much development away from the National Growth Area which is Cardiff, Newport and the Valleys.

In a letter from WG to Monmouthshire County Council dated 27 August 2021 required a level of housing growth no greater than 4,275 units plus an appropriate flexibility allowance: *"This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales."*

The fact that the housing figure in the Preferred Strategy, carried forward into the RLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales.

The later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes.

Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the RLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.



Part 4: Appearance at Examination Hearing Sessions

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

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

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	Yes

Part 5: Welsh Language

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

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



Guidance Notes

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

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

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

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

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

Tests of Soundness

Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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



New or Amended Sites

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

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

General Data Protection Regulation (GDPR)

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

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

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

The below image is around Chepstow Road and the and sewerage plant

Chepstow Road and the new development, and the pre school nursery on Station Road.



The below image is flooding around the sewerage plant and surrounding fields

The Nant-y-Wilcae brook that burst its banks to the rear of a housing development in Raglan.



The Nant-y-Wilcae brook in flood to the rear of a housing development in Raglan.

Flooding of a development site under construction in Raglan



Appendix



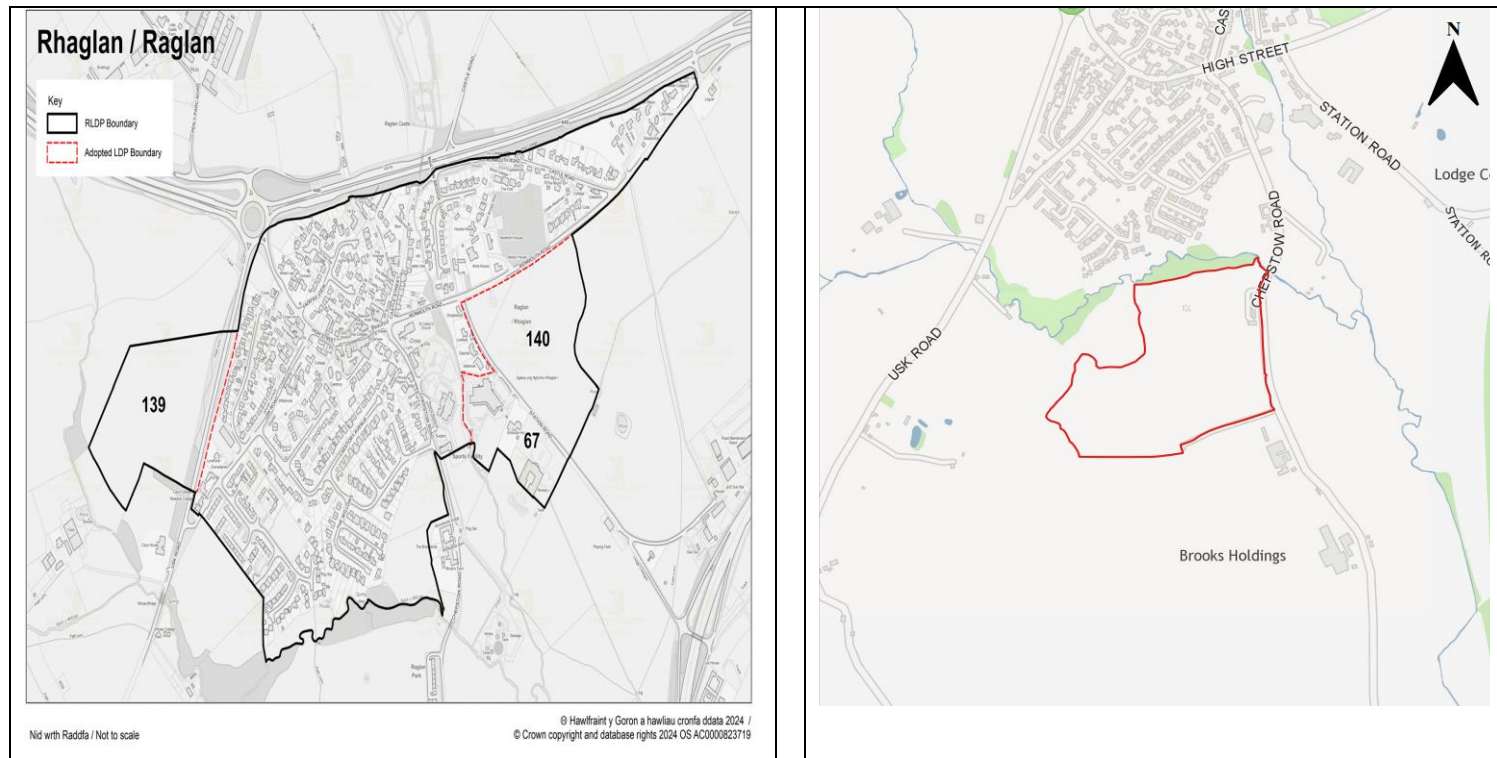
monmouthshire
sir fynwy



You will note the settlement boundary follows the Nant-y-Wilcae brook. The image on the right below was taken from Candidate Site Assessment Methodology (Updated June 2023)

The image on the left was taken from Extract from the Settlement Boundary Review (October 2024).

Therefore, the RLDP can not be considered as being sound.





Appendix 1:

Re RLDP Raglan

To who it may concern

Although I accept the need for extra housing in the area, after considering the preposed RLDP, I wish to state my following observations and concerns:

The target number for Raglan is too high.

- there are already 21 houses approved, 38 in progress of being built plus numerous infills, 8 in my immediate vicinity within the last 10 years.

The infrastructure will not be adequate.

- the **doctors'** surgery already has difficulty giving appointments
- the **school** is already full and even if the role drops, the number of pupils would increase quickly with the new affordable houses proposed
- more **cars** (average of 2 per house hold) and **heavy vehicles** would follow. The High Street already gets gridlocked. The Raglan / A40 junction is indisputably dangerous.
- **buses** are very infrequent and unreliable. On average, routes run one every 2 hours at best. Buses cease at 5.30pm.
- **drainage** cannot cope at present and in bad weather there is back up in existing houses. This will only get worse and more frequent with climate change.
- **broadband** is known to be particularly poor in Raglan despite having the Open Reach Office within the village

Flooding

- flooding is already very evident in some of the proposed areas. More houses mean more concreted surfaces leading to reduced **natural drainage**. There are at least three large **streams** already prone to flooding, flowing through Raglan that would be adversely effected. The latest being only two weeks ago. Raglan was almost cut off. My road was impassable and present houses were effected.
- the **New Graveyard** on Monmouth Road and Station Road where my son is buried, frequently floods due to the high water table. The building of the approved 21 houses opposite will only increase this and also the distress of relatives.

Pollution.

- **light pollution** would increase in amount and time span especially in industrial complexes (possibly 24 hours). There is already a well placed industrial estate on the outskirts that could be enlarged.
- **Air pollution** would obviously increase. We are already affected by this by our proximity the A449 and A40.

Community

- **community and leisure** provision is already poor as there is no Village Hall



Raglan has already accommodated a large amount of new dwellings but any further need to be built in the right place. I bring your attention to Monmouthshire County Council's 'Our Vision and Goals'.

I trust you will acknowledge these concerns.

Yours sincerely

Redacted

Appendix 2:

Dear All,

I felt the meeting on Tuesday evening went well and was constructive on all sides. Thank you to the clerk for putting together a very useful slide presentation.

I have made the following notes on issues raised. They are certainly not exhaustive, but may provide some points for the report to the county council on the RLDP.

- Flooding is of great concern, both in the proposed sites and in the likely impact on other areas "downstream" in the village. This concern highlighted the recent flooding in many areas of the village and made reference to the drone images taken on the day by a resident. Surface water is overwhelming current drainage. With more building on natural drainage sites, the problem can only be exacerbated.

- There is a serious lack of infrastructure in the village.
Public transport is infrequent and cannot be used for commuting purposes, due to its hours of operation. Cars are, therefore, a necessity, directly contradicting the "active travel" policy.

No proof has been provided for the ability of the utilities, such as sewerage, clean water and

electricity to be able to cope with the huge increase in demand.

There appears to have been little thought given to the inevitable increase in demand for both the school and the surgery.

- The proposed solar farm will take good grazing land from the dairy cow herd. Production of milk will be seriously affected. Similarly the proposed "employment " site will take away useful arable land. This is at a time when food security has become an important topic.

- The "employment "site, itself, is at the top of the village and so will increase light and noise pollution across Raglan.



- The proposed developments will inevitably increase the amount of traffic, both personal and commercial, in and around the village. This will lead to more congestion and a greater risk of accidents in local, small roads.

- The size and number of the proposed developments are totally out of proportion to the current size of the village. There will be a complete change of character as the village morphs into a small town, with the accompanying pressure on existing infrastructure and risk to community cohesion.

Best wishes.

Redacted

Appendix 3:

From: Redacted

Date: Fri, 6 Dec 2024 at 11:53

Subject: mcc rldp

To: [REDACTED]

We believe that the new development plan is not sound because:-

1. The road infrastructure is not there in the village to support an increase in traffic that any new development would cause.(congested at the best of times)
2. The GP practice is already under pressure without adding More to it
3. The water treatment plant is insufficient to cope with the increase. and is also under threat of flooding
4. There is a better site for housing to the south, Prince charles way
5. There is no need both financially or employment wise to build a new industrial site West of raglan when you could increase the one already to the north which is not fully occupied. You have sites at Newport and Cwmbran which would be a better place as all the transport infrastructure is already in place (no need to travel to a new site in the middle of nowhere
- 6 .There is a major issue with flooding around the village which can only be aspirated by any new development
- 7 Light pollution noise and increase lorry/van traffic to new industrial site too close to residential area
- 8 Waste management site not highlighted at the drop in session only B1 B2 B8 shown to us although hidden on one of the other display boards ?cover up
- 9 Solar Farm. Why build something that is going to put other people out of work and would it actually benefit the village?



10 Raglan is a village not a major town and just because it not in the national park it should be respected before it loses its identity

11 Fill in Brownfield sites before destroying the fabric of a village

12 No one is objecting that there is a need for affordable housing but it dosnt need to be on a such a large scale in a small village.

i hope this helps you in some way towards a collective objection to the development plan regards

Redacted

Appendix 4:

To Monmouthshire County Council Planning Committee

I wish to convey my concerns and hence objections to the proposed developemnet plans for Raglan Village by Monmouthshire County Council Planning Committee.

1. Raglan is an historic village with Raglan Castle as its famous landmark, along with its surrounding beautiful green countryside. Greenfield sites need to be cherished and preserved for agricultural food production and should in my opinion not be built upon. I believe that it is incumbant upon Monmouthshire County Council to look to its own Deposit Plan 2018-2033 'The protection of our landscapes and Heritage that make Monmouthshire a unique, special and attractive place to live'.

2. A major concern myself and countless other residents of Raglan, is the INCREASING frequency of serious flooding that is occuring in Raglan due to climate change. I am hopeful that you will already have been furnished with the alarming aerial photographic evidence of the serious flooding in Raglan which took place two weeks ago during Storm Bert. Concreting over current existing greenfield land for housing developements, a large solar panel farm and a new Enterprise Park developement will, without question raise the water level table in Raglan. Such developement will actively increase flooding within Raglan which is contrary to the objective presented by Monmouthshire County Council Planning - Climate Emergency Strategic Policy S4 'Locating developement outside of flood risk areas'.

3. From my understanding, Monmouthshire Planning Committe is proposing the developement of over 100 new homes in Raglan (including those currently being built on Chepstow Road). With the average of two cars per household (bearing in mind the very limited provision of a bus service to get people to and from work), this will neseccarily cause a huge increase in car usage through Raglan. The high street already gets extremely log jammed and the addition of so many extra vehicles has the potential to cause massive disruption along Raglan High Street, particularly at peak times.

4. The above increase in car traffic in Raglan will cause an increase in carbon emissions, which will have will a negative impact upon the health of the residents living in Raglan who already live with the harmful emissions caused by being close/adjacent to the A40 and the A449. We have a 'Climate Emergency' and this will continue to increase if more vehicles are added to the roads in Raglan. We are many decades away from being carbon neutral with vehicles.



5. Raglan V.C Primary School is already at full capacity, which will mean that children from the proposed new housing development will need to travel by coaches through Raglan to neighbouring schools. So, in addition to the above increase in cars, the use of coaches will again only add to the air pollution in Raglan .

6. Raglan has already accomodated a large number of new houses, 34 currently being built on Chepstow Road and 21 new houses have been approved along Monmouth Road, as well as a quantity of housing infills. We have yet to see what impact these new builds will have in terms of the increase of flooding in Raglan. Even basic science would indicate that the addition of another 54 new houses, along with a large solar panel field, and a large Enterprise Park would ergo increase the flood risk to the people of Raglan beyond those who have already been affected to date by flooding.

I very much hope that you will acknowledge the points I have made prior to any decision making for the future of Raglan Village.

Your sincerely,

Redacted

Appendix 5:

Hello [REDACTED]

I would like to express my objections to some of the sites proposed for development under the above plan.

My first and biggest concern is that a plot of land off the Usk Road has been suggested as a site for industrial or commercial use. I object to this for several reasons..

1. Why does Raglan need this? There are currently empty units at the existing industrial site in Raglan (which is just off the old Abergavenny Road.
2. This is currently an agricultural site which does not need to be lost to the environment. There are sufficient brownfield sites to house this type of development just 12-15 miles away along the M4 corridor and along the heads of the Valley route.
3. The huge area, which will be all hard surfacing, is going to contribute to the well known flooding issues suffered in Raglan. The surface water run off will inevitably end up in the brook which is already so problematic. Flooding issues are a concern every year and very recent evidence of the extremity of this is available.
4. likely powerful lighting, definite large traffic increase and possible night working will disrupt the currently fairly peaceful environment of the village that is very important to residents - it's mosly why they live here.
5. Such a development and what it will bring will change the village of raglan beyond recognition and may open the floodgates to raglan becoming a mini town rather than a village as it is likely that other large developments will subsequently be proposed. The infrastructure we have is not suitable for this.



6. it will bring more traffic through the High Street in Raglan as not every vehicle will use the A40 to access the site. There are already enough problems caused by traffic passing through the High Street.

I also object to the proposal of land off the Chepstow Road being proposed as a solar energy site. My reason for this is that I believe this will contribute to flooding in that already difficult area. I so support the idea of alternative energy sources but if, as I am advised, these sites create more water run off than a field left alone then I believe more appropriate sites should be identified elsewhere.

I object to the land to the south of Monmouth Road behind the new graveyard being developed for housing. Again this is agricultural land and has already been refused by the inspectorate, one of the grounds being the lack of sufficient public transport for people to use to get to work etc. resulting in most of the households needing to use cars on a regular basis. I would also say that Raglan has accepted new housing developments off Chepstow Road (currently under construction) and just approved is a site to the north of Monmouth Road. It is my opinion that the infrastructure in Raglan will hopefully just about cope with these increases in population and all that that brings. Impact on the High Street and traffic increase are my major concerns. The junctions onto and across the A 40 present a real hazard which will be exacerbated by the increased usage a development in this position would create. I would also ask, does Raglan need this development? Has a local need for this been identified? Or will these homes attract people from far away.

Lastly I would like to ask why Monmouthshire has a target of over 6000 homes in the years covered by the RLDP? It is my understanding that the target was originally in the region of 4000 homes which sounds more reasonable. I am not against growth. I understand that people need homes. However I believe these should not be created to the detriment of existing communities.

Regards

Redacted

Appendix 6:

Dear Sirs.

The weekend of 23/24 November 2024 saw major flooding in Raglan, evidenced by drone footage published in the regional newspaper The South Wales Argus and Wales on Line.

Development of this small village over the years is destroying the equilibrium of the land and causing inevitable flooding and disruption.

Yet Monmouthshire County Council wants to damage the area even more.

Why make a bad situation even worse?



The site "Land West of Raglan" would cause enormous detriment to the village for the following reasons:-

This land is 4.5ha of green, natural drainage which would disappear completely.

The land is high and partly bordered by Nant y Wilcae, the brook that continues right around the South of the village and which flooded in Nov 2024.

Removing such a huge area of natural drainage on higher ground will certainly compound the flooding problem enormously, encircling the south of the village.

The proposal is that of "employment land" so anything could be built there! Resulting in 24 hour noise, lights, traffic and so on.

The land being higher could potentially have tall structures, lit constantly and be visible from many parts of the village lighting up the whole area.

An original proposal was for an even bigger area, so once "something" is built then the chances are it will expand.

The loss of natural habitat and wildlife would be gone forever.

Raglan already has a perfectly good Industrial Estate on the other side of the main roundabout. The infrastructure is already in place and it is well established, if not to full capacity.

Parts of the village had sewage coming up into their bathrooms in Nov, these houses were central to the village and not bordering the Brook, the water was far reaching and had a knock on effect.

It is a matter of record that extreme weather conditions will continue and be something we will have to learn to "manage" . Why on earth would anyone want it to be worse?

Further development would attract more vehicles and more pollution, after all it's not exactly cyclable.

I have been a resident for over 30 years and I strongly object to further unnecessary development which will damage the village even more.

Yours sincerely

Redacted





From: Redacted

Sent: 10 December 2024 10:19 PM

To: [REDACTED] Planningpolicy@monmouthshire.go.uk
<Planningpolicy@monmouthshire.go.uk>

Subject: Monmouthshire County Council RLDP 2018-2033 - Land West of Raglan

Dear County Council/Town Planners,

I have been a resident of Raglan for over thirty years. My family moved to the area so that I could be raised in a peaceful, quiet community. The village has always been this and continues to be so. I plan on raising my daughter here and giving her the same wonderful childhood experience which I enjoyed. The building the site 'Land West of Raglan' would decimate the tranquility of the small village lifestyle that myself and the other villagers have become accustomed to over the years. There are countless industrial estates in the surrounding area which offer the same benefit your project entails without encroaching on the local community, including one less than a mile from the village and, furthermore, one which is not full to capacity.

As you have no doubt seen, the recent flooding has caused considerable turmoil to the local community. Many homes were flooded and well established lines of communication and transport severely impacted. Such a project would simply increase the devastation such weather causes as many of the sites lie on higher ground than that of the village. You would remove massive areas of natural soak away which would simply increase the risk, severity and frequency of flooding in the local area.

Other impacts that the new sites would have include the additional light pollution and traffic impacting the local area. There must surely be a more suitable location to establish such a site which does not impact a well established, tightly knit community, many of whom choose to live there to avoid such disruption as that proposed by your project.

A final point I would like to raise is the area to the West of the village is one in which I hold particularly close on a personal level. I have bird watched across this stretch of land for many years and the removal of this opportunity would no doubt impact on others with similar interests.

Furthermore, my shooting rights, granted by Gwent Constabulary, allow me to shoot from a neighbouring field. I would certainly lose the opportunity to shoot across this land, and hence my license which took years to earn, due to the constraints of the industrial estate.

In closing, I urge you to reconsider. For the above reasons, such a proposed project would impact the local area on a financial, personal and physical safety level, one in which would have a significant lasting impact on the local residents.





Dear [REDACTED]

My comments re the RLDP are below:

The jargon used in the report is almost incomprehensible to the layperson but I have tried to work out what is planned for the area of which I am a Community Councillor.

I don't think that the number of houses that could come to the Raglan area is acceptable in the timescale set out for this report.

My reasons are:

We do not have the infrastructure to support the additional housing.

We do not have sufficient water treatment for either sewage or rainwater

We do not have capacity in the doctor's surgery for the many more people that would be in the Raglan area.

We do not have the roads or transport links for many more people to travel to work.

We are surrounded by BMV land which should not be used for development.

Slow and steady is the way to develop the village of Raglan and its associated minor rural settlements.

I don't think a new industrial area is warranted for Raglan. The existing site could be expanded if businesses want this.

Further notes on the document

Section 11 sets out the situation and Strategic policy S6 says infrastructure improvements should be provided prior to development. We are not seeing this in the Raglan area

In the section which describes Monmouthshire's Natural and Built Environment (section 2.1.7) the section shows Monmouthshire as renowned for *its beautiful landscapes and biodiversity*.

In section 3.1.3 Water quality is highlighted

In the area covered by Raglan CC one of the key issues in housing is the provision of waste water treatment and rain and storm run-off.

Section 3.1.7 states that land which is designated as *Best and Most Versatile* cannot be avoided for development

Under Climate Change Policy S4 the document says development should be avoided in areas at risk of flooding. This has not been done in Raglan and the addition of further large numbers of properties will not help in this aim. Proposals so far have not shown commitment to *Policy CC1 Sustainable Drainage Systems*

Section 10.13.4 says that DCWW is committed to *undertake improvements in WwTw capacities*. We have seen nothing about this for the Raglan area and the increase in housing and industrial sites envisioned for the area would strain to breaking point the current waste water treatment.

Surface water is also a problem in Raglan with the Brook taking a lot which in times of high rainfall is not sufficient leading to flooding. Low lying places in Raglan village and in other parts



of the Community Councils area have been the subject of flooding recently and this is only likely to increase in the future if all we are told about climate change comes to fruition.

My view is that new sites containing more than 25 houses become ghettos not linked to the rest of the community. We should be going for smaller developments that can be taken into the community without problems.

The view in Raglan of an expanded industrial area on land that is currently farm land is not acceptable. The land currently used as the industrial site could be expanded.

I hope this is helpful for your report writing. You can add my comments verbatim or put them into your report.

Best wishes for a Merry Christmas and a Happy New Year

Redacted

1239

The Canal & River Trust (Glandwr Cymru)

[View results](#)

Respondent

377

Anonymous

47:50

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)

The Canal & River Trust

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 placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

12. Would you like to comment on this question *

☒ Yes

☐ No

13. Is your representation in support or objection? *

☒ Support

☐ Objection

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

S3, PM1

Thank you for consulting the Canal & River Trust, or Glandŵr Cymru in Wales. We are the guardian of the majority of the of the Monmouthshire and Brecon Canal as it runs through South Wales, and we are working with all the councils through which it runs to promote the benefits that the canal corridor brings to each area.

Glandŵr Cymru is fully supportive of these policies which is in line with our own guidance. Our guidance to creating successful waterside places can be found at <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/creating-successful-waterside-places>

Glandŵr Cymru will shortly be publishing a document 'Coding for Waterways' which will help identify specific issues to be considered in waterside sites.

PM2 Support this policy

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

17. Is your representation in support or objection? *

☒ Support

☐ Objection

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

S5

Glandŵr Cymru is fully supportive of this policy and its supporting text. We are pleased to note that there is a requirement to carry out an audit of the existing situation to better inform discussions on what impact there may be and whether remediation is necessary.

Glandŵr Cymru promote our canals as multi-functional Green Infrastructure assets and we note that canals are specifically recognised as GI in the glossary and in para 10.2.1

GI1 Support.

NR1 Support. Glandŵr Cymru has written to all Local Planning Authorities regarding LNRS setting out how together we can identify and deliver opportunities for habitat enhancement on our waterways through Local Nature Recovery Strategies (LNRS), to meet local and national aspirations for access to blue-green space, habitat quality and connectivity.

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

19. 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)

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☒ Yes

☐ No

22. Is your representation in support or objection? *

☒ Support

☐ Objection

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

H17 Llanellen - General comment

Any new path (or improved existing path) joining the canal towpath should be agreed with Glandwr Cymru to ensure that the location and design of the joining point is safe and suitable for all users and is not detrimental to the canal embankment. This matter should be discussed and agreed before a formal planning application is made.

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☒ Yes

☐ No

28. Is your representation in support or objection? *

☒ Support

☐ Objection

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

ST6

Glandŵr Cymru support this policy and note that 'Redundant routes' will be protected from development that would prejudice future sustainable transport use. However Glandŵr Cymru do not consider the canal and its towpath to be 'redundant' even if their former use in carry freight has waned. The canal remains an important leisure and recreational route used by local residents and visitors to the area.

We continue to advocate the need for an alternative strong canal related policy which recognises the multi-functionality of the canal and its wide-ranging benefits. The existing policy is very limited in considering it needs to protection as a sustainable transport route alone, when canals deliver so much more.

Glandŵr Cymru has published an eplanning toolkit which gives further detail on the role that canals can play, and we suggest working with the council to create a new wide-ranging policy which recognises the full range of benefits the canal brings to the area. The canal is a multi-functional assets providing economic, social and environmental benefits. Whilst it can provide a local and strategic sustainable transport route in addition to being a form of green and blue infrastructure, important for leisure, recreation and tourism uses.

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

30. Would you like to comment on this question *

☐ Yes

☒ No

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

31. Would you like to comment on this question *

☐ Yes

☒ No

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

32. Would you like to comment on this question *

☐ Yes

☒ No

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

33. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

Please refer to the notes at the for further

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

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

☒ Yes

☐ No

Part 4: Appearance at Examination Hearing Sessions

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

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

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

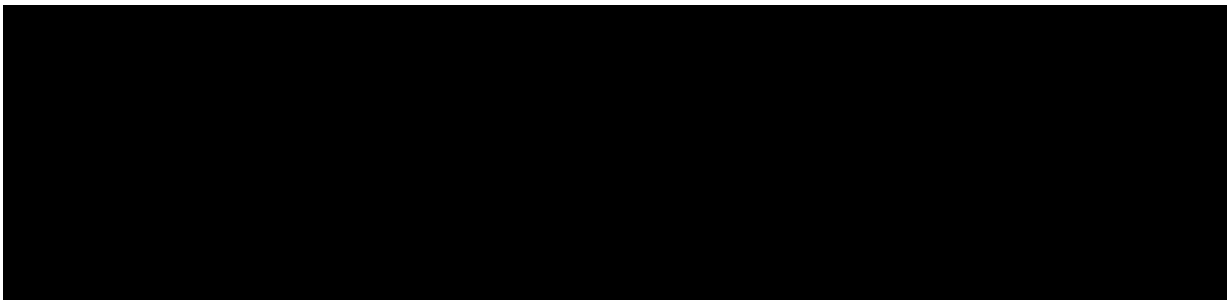
☐ Yes

☒ No

Part 5: Welsh Language

36. 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?

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



1255

Home Builders Federation (HBF)



**Office
Use Only**
Representor
Number

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

Monmouthshire Deposit Plan Representation Form

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

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

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

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

planningpolicy@monmouthshire.gov.uk.

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

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

Part 1: Contact Details Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

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



Email:



Part 2: Your Representation

Office
Use Only
Represent
tor
Number

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

Is your representation in support or objection?

Support:

Objection:

X

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

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

Para.3.1.9

HBF suggests some additional wording to make it clear that it is not the role of the LDP to assess or designated Green Belt, instead, it is the role of the SDP in line with Future Wales.

Objective 10

As currently worded the objective relates to housing in its headline, yet in its more detailed objective only references affordable homes. HBF considers that reference should be made to all tenures of housing, as this will support the delivery of 'mixed sustainable places' and economic growth both requirements/aspirations of the plan.

Objective 10 /11

HBF questions the need to refer to housing schemes as 'exemplar', we note that no other objectives require an 'exemplar' solution. This would appear to increase the pressure on the delivery of homes and runs the risk of delaying delivery. There is also the question over who will decide if something is exemplar as this is often an accolade awarded to a development post completion rather than a decision made during the planning application stage. Other policies within the plan should and do drive high quality sustainable development so the requirement to be 'exemplar' is considered unnecessary.

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:	X
	Objection:	X

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

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

Although, the HBF supports the level of growth proposed by the policy and the 15% flexibility allowance, it is disappointing that the Level of growth has been reduced from the previous Deposit Draft in part as a result of intervention from The Welsh Government. The HBF considered that the previous higher figure was justified by the Councils supporting evidence and nothing has changed in terms of the evidence to justify the proposed reduction. Any further reduction in the proposed figure would therefore be unacceptable and unjustified. Further, in view of the delays in bringing some sites forward in the current LDP and the nature of the newly allocated sites, a number being green field requiring infrastructure upgrades, the 15% flexibility is also considered appropriate and should not be reduced.

Para 6.3.2 The Plan is focused on the delivery of affordable homes to specifically address housing affordability which is one of the most fundamental challenges facing our communities.

The HBF challenges this statement, as affordability is not just about providing affordable homes. Affordability is an issue for many private house purchasers, as not all people looking for a home will qualify for an affordable home provided by a Housing Association [HBF presume this is what Monmouth mean by affordable home is in line with the Welsh Government definition in TAN2], if so, this should be clarified by amending the text.

This point is highlighted in part by paragraph 6.3.8 in the document which suggests that *'the provision of a wider choice of smaller market and affordable homes will provide opportunities for both younger people to both stay in and move to the area, and older people to downsize from large family homes.'*

Para 6.3.4 This ambitious policy may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding.

The HBF are concerned about this statement as developers have no control over if and when such a policy position would be changed by Welsh Government. Further HBF consider it's unlikely that Welsh Government would change such a policy for only one LPA so there is doubt over how much control Monmouth also have over this policy change. This uncertainty can only lead to concerns over deliverability and the soundness of the plan.



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:

X

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

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



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

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

Is your representation in support or objection?

Support:

Objection:

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

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

Policy NZ1 – Monmouthshire Net Zero Carbon Homes

The HBF objects to the principle of a Local Development Plan policy being used to impose building standards requirements over and above national policies contained within Building Regulations. Planning Policy contains no guidance on how to set such standards within the planning system, accordingly the main concern is that this will result in a different set of standards for each LPA which is likely to have viability issues as well as slowing down the delivery of new homes.

The way in which homes are built, including the standard of construction, has always been controlled through Building Regulations, a national standard applied across Wales. In terms of energy efficiency, the standards are due to be increased in 2025 as set out in the previous increases in 2020. These new requirements will therefore be in place when the homes proposed to be allocated in the replacement plan are constructed.

HBF considers that Policy NZ1 conflicts with paragraph 5.8.5 of Planning Policy Wales, which states higher standards should apply only to strategic sites. Applying these standards to all housing allocations exceeds the remit of local policy.

The higher costs associated with the increased building requirements to meet the proposed standard is likely to affect SME developers disproportionately, another reason why the requirement should not apply to all new development.

The HBF are also concerned that there is a lack of resources including knowledge and experience available to implement such a requirement, the added complication of new homes being required to comply with both a building standard through planning and building regulations is likely to slow down the delivery of new homes. In particular any delay associated with the signing off of the 'built performance survey following construction' is of particular concern, as this could impact on mortgage offers and the ability of purchasers to complete their purchase.





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

Is your representation in support or objection?

Support:

Objection:

X

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

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

Policy S5 Green Infrastructure, Landscape and Nature Recovery

Policy GI1 – Green Infrastructure

Supporting text paragraphs.

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

Policy GI1 (a)- specifically demands a GIA be submitted with all major development applications. This is not in line with PPW and should be changed to reference a GIS only.

Further the HBF considers this policy is unnecessary as the policy requirements mirror those already in national policy. It's noted that the supporting texts states that the policy repeats national policy.

Para 10.1.6

HBF highlights a misinterpretation of PPW12 within the RLDP in respect of Green Infrastructure Assessments (GIA) which is a duty placed on LPAs to undertake and not a developer.

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

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



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

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

Strategic Policy S5

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

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

Is your representation in support or objection?

Support:

Objection:

X

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

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

Strategic Policy S6 – Infrastructure

Where possible, infrastructure improvements should be provided prior to occupation.

In terms of the above sentence HBF requests that the following additional wording is added 'On larger sites a phased delivery will be acceptable subject to agreement over triggers as part of the S106 agreement.'

21.3.8 Developers are encouraged to maximise the functionality of public open spaces by considering opportunities for biodiversity net gain, ecological connectivity, SUDS and active travel. Recreational facilities should not be included within areas of SUDS

The HBF suggests a change of wording to provide support for the principle of 'stacking' to allow a range of uses within informal open space. Instead of saying 'developers are encouraged' it should say 'the Council will support' the multi-use of informal open space.



Such an approach would have the advantage of helping to maximise land use and also help scheme viability.

In terms of the final sentence the words 'recreational facilities' has not been used in Policy C12 which the text supports. HBF suggests clearer wording linked to the policy wording, HBF presumes this sentence means no 'Formal open Space' within SuDS areas.

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

Is your representation in support or objection?

Support:

Objection:

X

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

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

S7 – Affordable Housing

The HBF questions what is meant by the phrase 'meet national policy guidance in relation to the most efficient use of land'. Any development proposed will be subject to compliance with all other relevant policies within the plan and these policies should be in accord with National Policy. Accordingly, the phrase is considered not only too vague but also unnecessary.

The supporting text to Policy H8 includes two paragraphs [12.10.6, 12.10.7], HBF requests that these include additional clarification.

Regarding para 12.10.16 further guidance is required to advise at what stage in the planning process will this decision/ advise be available. HBF advises that it will be needed at pre application stage if delays in the determination of the application and abortive work on the scheme are to be avoided. The tenure mix will also affect site viability particularly due to the 50 % affordable requirement, therefore wording needs to be included to cover the need to be flexible, otherwise again potential delays in deliverability of the plan may occur.

Regarding para. 12.10.7 HBF suggests that the wording should include clarification of what 'housing evidence' is being referred to, we presume it should be the latest LHMA. Although flexibility in what evidence can be used would be helpful, such as use of local waiting lists.

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



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

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

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

Strategic Policy S8 – Site Allocation Placemaking Principles

All residential site allocations must comply with and incorporate the following placemaking principles into the schemes:

Sustainable Communities

- *Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location. Where appropriate, the layout will identify and respect key views to and from the wider landscape setting.*
- *Provision of 50% affordable homes on-site comprising a mix of housing types and tenures to meet local need.*
- *Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points.*
- *Provide a mix of house types, tenures, sizes, materials and colour to be developed at an appropriate density.*
- *Broadband /digital infrastructure must be provided to serve each new home.*

HBF notes that all these requirements are repeated within other policies in the plan or national policy so are unnecessary.

HA1- HA18 – Residential Site Allocations

HBF notes that within the Tier 1 and Tier 2 settlements none of the allocations are likely to be suitable for development by SME companies, due to their size. This leaves only 259 unit or 11% of allocated sites suitable for SME's. HBF suggests that this is a missed opportunity for the plan to support the delivery of homes by SME's and if this where to be done it could help ensure delivery of the plan because of a wider range of developers being able to contribute. Site suitable for SME's are usually less than 50 units and often are able to come forward quicker.

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



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

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
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Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

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



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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

X

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

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

Policy CC1 – Sustainable Drainage Systems

The HBF considers this policy is unnecessary as the requirement to use SuDS is covered by separate legislation. The policy attempts to go further than existing legislation by requiring SuDS drainage on all development, the HBF argues this is not the role of the planning system. Further there is no justification provided as to why the policy should go further than existing national policy.

Policy PROW1 – Public Rights of Way

The HBF considers that the first paragraph of the policy is not necessary as it merely states a process which already exists and is dealt with by separate legislation.

The HBF notes that the plan will have less than 10 years left on adoption, The current plan DA indicates adoption in 2026 at which point the plan would only have 7 years left. The Development Plans Manual states that *'When a plan is adopted, there should be at least 10 years left of the plan period remaining.'*



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

Do you consider that the Plan is sound?	Yes:	X
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): There are a number of concerns raised by HBF in the answers to the questions above, although individually they do not make the plan unsound, we are concerned that they may slow down the delivery of much needed new homes.		

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.

	Yes:	X
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If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

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

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



Guidance Notes

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

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

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

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

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

Tests of Soundness

Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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



New or Amended Sites

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

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

General Data Protection Regulation (GDPR)

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

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

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

1367

Abergavenny and District Civic Society



**Office
Use Only**
Representor
Number

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...1367...
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Monmouthshire Deposit Plan Representation Form

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

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

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

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

planningpolicy@monmouthshire.gov.uk.

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

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

Part 1: Contact Details Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		
Job Title:(where relevant)		
Organisation: (where relevant)	Abergavenny and District Civic Society	
Address:		
Telephone No:		



Email:

Part 2: Your Representation

We wish to record that we find a form that invites 'comments', and then asks whether a representation is in Support or an Objection, is difficult to complete when the representation is finely balanced. This is especially the case where relatively minor amendments are requested to supported a policy or where unresolved matters require an objection to a policy supported in principle.

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, with one reservation

Objection:

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

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

Para 3.1.1 and Objective 9: While we recognise that an ageing population is an issue or challenge for local services, especially if they are locally funded like much of care of the elderly, we are not convinced that the attempt to correct this by encouraging growth via the Town and Country Planning Act plan-making process is valid. Planning has little control over the age of those taking up new housing, except indirectly via the allocation of some affordable housing. We recognise that the high proportion of affordable housing in this RLDP may therefore assist an improvement to the local demography, but the plan has no supporting evidence to support this, or reference to the possibility that attracting younger people might put pressure on services such as education. Demographic imbalance can be accentuated by administrative boundaries and the consequences should be redressed by Government funding.

Apart from this reservation, which was more strongly held when the LPA favoured much greater growth of market housing supposedly to improve the county's demography, we support the vision and (unquantified) objectives of the Plan.





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, with reservations

Objection:

To the 15% flexibility allowance

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

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

Conditional Support for Policy S1: While we doubt the deliverability of the plan's housing requirement by 2033 and would welcome a lower number, and, despite previous opposition to the housing requirement of the plan, we now accept this, except the 15% flexibility allowance which seems unnecessarily high without further justification.

The evolution of our views is described to assist understanding of our position:

Background:

In a Strategic Options consultation in 2019 the Society preferred a Mid Growth option for an extra 4,305 homes, or 287 extra homes per annum, close to the average for the past fifteen years. We contested options that would encourage high levels of in-migration but lacking evidence supporting a proportionate increase in local employment. We particularly questioned the lack of evidence that in-migration will significantly improve the demographic profile of a county that is popular to retire to. Nevertheless in 2020 the Council consulted on a Preferred Strategy to provide for 8,322 extra homes across the county 2018-2033 (averaging 550 pa). The Council considered this level of growth, the second highest Option, to be that which best achieved their Objectives. Consultation was halted by Covid measures and in 2021 we were consulted again on Strategic Options. The Society regretted that these were little different from those in 2019 despite significant changes in the context, including new population and household projections and the existence of a draft Welsh Government Future Wales national framework. In mid-2021 there was consultation on an updated 2020 Preferred Strategy – now for 8,366 homes. An extensive Society response objected strongly due to conflict with Future Wales and unrealistic economic growth ambitions. We suggested an average annual housebuilding rate of about 300 if this was the result of an acceleration of the delivery of affordable housing. Welsh Government made a similar response, suggesting that about 4,275 extra homes plus flexibility would be sufficient.

In late 2022 a new County Council consulted on a Preferred Strategy for up to 5,940 extra homes including 10% flexibility (396 pa). The Society welcomed a somewhat arbitrary reduction of the housing target but would have preferred it to be about 5,250 (350 pa) and restated concerns that the unrealistically high job creation target, 50% affordable housing provision and extra infrastructure would not be achieved. This time the Welsh Government accepted the proposed housing growth, especially because of the Council's evidence of a





high need for affordable housing, also recognised by the Society. In October 2023 the Council agreed a strategy with an amended figure of 6,210 homes to provide extra flexibility in case some sites do not proceed as hoped.

The Deposit Plan:

The Deposit Plan continues to provide for up to 6,210 extra homes (5,400 plus a 15% flexibility allowance that is not in our view sufficiently supported by evidence of need); up to 2,000 will be affordable. Despite our 2023 doubts about the countywide housing growth provision, for the following reasons we do not now object to the Deposit Plan housing figures:

- (a) the housing provision is much lower than that in the first Preferred Strategy and the Welsh Government has conditionally endorsed the present Council's compromise between their initial figures and those of the previous Council; if the Government now shares the County Council's interpretation of Future Wales 2040 we do not demur, especially as:*
- (b) on past evidence and considering economic and other uncertainties we doubt that the housing requirement will actually be achieved by 2033; over 4,000 homes would have to be completed in nine years, an average of 450 pa, a rate achieved only in four years this century. The peak delivery of 600 in 2027/28 expected in an optimistic Housing Trajectory seems unlikely with Adoption of the Plan only expected in May 2026.*
- (c) the increase in the flexibility percentage from 10% to 15% has not been adequately supported by evidence of need, and should be, as it means a maximum countywide yearly average of an extra 60 homes.**
- (d) a high proportion is intended to be affordable housing, especially social housing for those already living (and possibly working) in the county;*
- (e) our fears of extra unsustainable commuting by car to work out of the county may be mitigated by working from home, the growth of EV car ownership, job creation just over the county boundary (e.g. at Mamhilad, Torfaen) and public transport improvements close to new housing, as at East Abergavenny; and*
- (f) we are broadly content with proposals for the Abergavenny area, which are the Society's primary concern.*

We are aware that representations may be made against housing proposals in other parts of the county and we would equally support a consequential lower countywide housing requirement. Conversely, we would object to any proposals that significantly increase the housing requirement. That would not comply with the government's Future Wales policy, put excessive pressure on infrastructure and be of more questionable deliverability. We would also object to any diversion of housing growth from elsewhere in the county to Abergavenny, apart from a modest increase in the allocation to the East Abergavenny site.

Our reservations about paras 6.3.6-8 have already been stated under 'Q.1'.



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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:

Yes

Objection:

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

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

We note the footnote on the employment growth strategy for Abergavenny/Llanfoist and deal with that matter under 'Q.12' below.

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

Is your representation in support or objection?

Support:

OC1 if amended

Objection:

GW1

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

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

Objection to Policy GW1 (Inset Proposals Map): We welcome Policy GW1 as worded but object to Policy HA5 (see 'Q.10' below) and consequently object to the Green Wedge boundary in the vicinity of HA5 and propose an amended boundary as shown on the accompanying plan ADCS 1. This objection should be considered together with our response to 'Q.10'.

Having proposed Green Wedges between the Settlement Boundary and the boundary of Bannau Brycheiniog National Park as Candidate Sites for Protection, the Society welcomes this policy.

However, if, as we wish ('Q.10'), Policy HA5 is rejected, the GW1 boundary on its lower, settlement, edge will need adjustment as shown on our plan. Our plan also adds a further



area to the Wedge that has been omitted with little explanation, except that in the Green Wedge Assessment the designated area is considered to have a moderate-high potential for designation whereas the 'white area' has a moderate potential. It seems irrational to designate only an arbitrary upper band of the narrow area proposed by the Society as the purpose of the Wedge is to provide a buffer between the settlement edge and the National Park boundary.

If the lower area is not added it will be vulnerable to random development that would be damaging to the well-defined settlement edge. However, we have not included field X in the Green Wedge as this Candidate Site might be suitable for future housing development if access difficulties can be overcome.

A Society proposal for a Green Wedge in the Gavenny valley (CSP001) has been assessed by the LPA as an Area of Amenity Importance, and rejected. We presume its Green Wedge potential was not assessed because it is not considered to fit the PPW guidance that wedges should either be a buffer on the National Park boundary, in the vicinity of Llantilio Pertholey church, or safeguard important views into and out of the area. We hope that the settlement boundary and other constraints will sufficiently protect the area.

The aims of Policy OC1 are supported but the wording appears to be inconsistent with Policy E2 if that policy is amended as put forward in our objection ('Q.11').

Our objection to Policy E2 arises from our concern that, as drafted, it may prevent an employment development being allowed on non-allocated land at Abergavenny/Llanfoist, where very little employment land is allocated. Since any non-allocated employment land is likely to be open countryside, an amendment to Policy E2 needs to be accompanied by an amendment to Policy OC1, perhaps by adding E2 (amended) to sub-para a).

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

Is your representation in support or objection?

Support:

S3, PM1-3, HE1,2 – with reservations

Objection:



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

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

Despite wondering what the 'distinctive identity' (para 8.1.1) of Monmouthshire actually is, and the policy seeming more applicable to placemaking at the scale of strategic sites than to, say, changes within Conservation Areas, Policy S3 is supported. However, we repeat our comment on the Preferred Strategy: 'We continue to question whether the approach to design should always be *led* by Green Infrastructure; good design responds to all aspects of the context, opportunities and needs of the site.' Sub-para iii) and para 8.1.2 would be improved if the plan referred to a 'landscape and biodiversity-led approach'. The definition of GI in para 10.2.1 indicates that it is about the connectivity of the network of 'green' and 'blue' features, whereas landscape (including townscape) is a rather wider, more three-dimensional, planning consideration, often including a wealth of wildlife.

Policy PM1 is supported as a concise statement and we hope that early preparation of SPG will amplify policy. We are pleased that the policy does not use the word 'beauty', a challenging measure to achieve. The policy or the accompanying text needs to recognise that the county has little overall distinctive urban character and that even locally it is only a result of historic townscapes and building materials. This variety is a strength that adds character and allows a more flexible application of policy than in some other parts of the UK.

Policy HE1 is supported but we note that it omits Adopted LDP policy that 'good modern design may be acceptable, particularly where new compositions and points of interest are created.' This may be felt unnecessary in HE1 but something similar may be helpful in the accompanying text. Like 'high quality design', 'good modern design' needs to be defined. New styles and sustainable materials can add to the variety and quality of the county's Conservation Areas more than a design that blandly references traditional characteristics.

Policy HE2 is supported but needs reference to the treatment of shopfronts that are to be retained when policy allows the retail use to be replaced by residential, business or other uses.

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:	S4 with reservations, NZ1 in principle, CC1-3
	Objection:	

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

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

Support the aim of Policy S4 but call for clearer wording:

We consider that the requirement 'to address' is insufficiently clear as it can mean that a developer can either pay attention to the matters concerned OR deal with them. This leaves room for a developer to address/consider the matters but decide not to take any action to deal with them. The LPA would therefore seem unable to challenge that decision (except by reference to another policy). We suggest 'All development proposals must demonstrate how they minimise their contribution to climate change and how they adapt to climate change. Subject to other planning policies, developments that respond positively and appropriately to the following needs are more likely to be permitted:'

Sub-para ii) is unlikely to be clear except to those experienced in this field. We also wish to see a sub-para that, at least for buildings above a certain size, requires evidence of consideration of the consequences of the release of embodied carbon during demolition, followed by redevelopment with materials embodying high quantities of carbon, and the alternative of adaptation and refurbishment.

We do not have the expertise to comment on the details of welcome Policy NZ1 but recommend careful consideration of the submission of local architect [REDACTED] who has that expertise. The policy needs to be clear whether 'All new build residential development...' includes home extensions that are not permitted development. The LPA will also need to have ready access to the expertise necessary to apply the policy.

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

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



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

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

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

Is your representation in support or objection?

Support:

Objection:

Yes- clarification needed

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

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

While the intention of Policy S6 is supported, our objection is to the absence of any reference to the possibility that the non-viability of a development in terms of meeting infrastructure needs may be such that permission should be refused. The final paragraph, understandably giving a priority to affordable housing requirements, could, as expressed, lead to the approval of housing developments lacking the even more essential provision of strategic utilities, education and health capacity or sustainable transport. Clarification is needed.

Para 11.1.7 indicates that viability appraisals will be required at the planning application stage. Perhaps, but reference should also be made to Para 4.2.20 *et seq* of PPG12 which require the financial viability of housing sites to be assessed prior to their allocation in the plan. Certainty that strategic sites can be delivered is particularly important. Viability assessments should not normally need to be revisited at the planning application stage. We refer to this matter again in answer to 'Q.10'.

**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:	S7, H1, H3-H9 subject to comments below
	Objection:	

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

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

Policy S7: The official definition of ‘affordable housing’ is no doubt contained in Welsh Government guidance and does not have to be repeated in Section 13. Nevertheless, only social rent housing usually escapes public criticism of the term, and some definition would be helpful clarification in this section.

Policy H1 is supported only in respect of Abergavenny/Llanfoist and subject to our comments on the boundary of HA1 and our objection to HA5.

We make no comments on Policy H2 proposals.

The reference to ‘infilling of a small gap between existing buildings’ in Policy H3, rather than between existing dwellings, would seem likely to be less controlling of development pressure than present policy.

Para 12.5.2: Request for a commitment to adopt supplementary guidance on Horticultural Rural Enterprise Dwellings.

At the Preferred Strategy consultation stage the Society suggested ‘that there is a need for a strategic policy, amplified by a management policy and/or SPG, that responds to changes in farming and horticulture that are increasing the demand for small new holdings accompanied by an appropriately sized tied dwelling on-site or very nearby. The present LDP makes no reference to One Planet Developments and recent applications have been assessed against rigorous Welsh Government guidance, but we believe that there should be a wider enabling policy for new labour-intensive fruit and vegetable-growing holdings of less than, say, 10ha. We recognise the challenge of devising a policy that meets a growing need of the rural economy without reversing decades of refusing most new agricultural dwellings. That policy reflected the increasing size of farms, the reduction of the labour force, and the need to protect open countryside from unnecessary new housing that was liable to be converted and enlarged with unrestricted occupancy in unsustainable locations. As part of its response to the climate emergency, planning policy now needs to contribute to enabling a return to smaller holdings serving local communities in acceptable locations and subject to strict conditions to prevent abuse.’

This comment was based on awareness of work on a 2023 research report on planning issues regarding such dwellings in the National Park, Monmouthshire and Powys. Since then, Powys CC has adopted guidance on the matter to amplify PPW12 and TAN 6 and their Preferred Strategy consultation lists this as a New Policy Area for Consideration.



We note that the Deposit Plan relies on Paras 12.5.1-2 to deal with New Dwellings in the Open Countryside and that 12.5.2 refers to One Planet and rural enterprise dwellings. Policy S11 gives general support to the diversification of the rural economy but there is no reference to the type of smallholding with a dwelling described above. This representation seeks amendments to Para 12.5.2 and Appendix 11 of the Deposit Plan.

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

Is your representation in support or objection?	Support:	S8
	Objection:	HA1 and HA5

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

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

Objection to Policy HA1: We support this proposal in principle but consider that it is insufficiently planned as put forward in the Deposit Plan. As this is a key strategic site, we believe that unresolved matters undermine the soundness of the Deposit Plan; if HA1 is not shown to be sound a major amendment will be required to meet local and countywide housing requirements.

It is not acceptable to leave further detailing to pre-application masterplanning and consultation.

General Reservations

It is regrettable that the Candidate Sites process and proximity to the rail station may have steered this strategic site option away from land further north with gentler slopes, better scope for crossing the trunk road and railway and even using the B4521 connection to the trunk road.

Para. 4.2.20 of PPW12 requires the financial viability of housing sites to be assessed prior to their allocation in the plan. Key sites such as HA1 require 'a site-specific viability appraisal through the consideration of more detailed costs, constraints and specific requirements'. This work has yet to be completed and it is our fear that the costs of acceptable integration of the site with the existing town, together with other requirements and obligations will not be viable for 500 homes and other proposed land uses.



At the Preferred Strategy consultation, the Society stated that ‘MCC’s firm commitment to the early provision of a suitable all weather active travel crossing of A465 and the railway is required to ensure the continuing support of the Society for this strategic site.’ Our comments on Candidate Site CS0213 stated that ‘We agree that the masterplanning of EA [East Abergavenny] should proceed if the feasibility and viability of land use allocations and the phasing of development are to be soundly based for inclusion in the replacement plan. It will not be sufficient to merely allocate a large mixed-use area and leave the details to planning applications. It will be essential to demonstrate that the EA proposal is feasible, viable and affordable both within the plan period and beyond. This is therefore not a total endorsement of the EA strategic site at this stage. We have major concerns about how a new community that may ultimately grow to 2,000 homes can be satisfactorily integrated with the rest of the town on which it depends.’ We also commented that ‘If the EA site is to form a satisfactory part of the new LDP its boundaries will need to differ from those of CS0213, extending to encompass more land adjoining A465 (for a suitably located junction with the trunk road, station car parking and an active travel crossing to Station Road) and to provide a more direct access to Ross Road.’[should have read ‘the old Monmouth Road’]

With other interested community representatives, we have since had a meeting with MCC and a representative of the CS0213 promoter at which it was evident that objectives were shared but no commitments to meet our conditions were received. While the Deposit Plan contains information that is helpful, key evidence of viability and deliverability is absent; little has been costed. We have only been assured that the 50% affordable housing provision is viable. The vital means of active travel crossing of the A465 and the railway are unresolved, but there are suggestions that this may be by comparatively low-cost means that may not meet government Active Travel Act Guidance (ATAG - see Policy ST1)) or the Society’s expectations. MCC indicate that masterplanning is continuing but we are conscious that the procedural scope for amendment of the Deposit Plan by MCC may now be limited.

If HA1 is not to become a detached heavily car-dependent suburb, residents must have easy direct and attractive active travel access to the facilities of the present town from the first home occupation. Retrospective improvements to road and rail crossings are unlikely and may be too disruptive to manage.

*We note that the HA1 site is largely Candidate Site CS0213 (Monmouthshire Housing Association) but includes a small but essential part of CS0293 (Coldbrook Estate). It seems clear that extensions of the development are likely to be put forward in future development plans. Our accompanying plan **ADCS 2** suggests that the addition of more of CS0293 might be considered now with the proviso that the development will extend beyond 2033. The high front-loading capital costs of integrating with the town might be more easily accommodated by taking account of this larger development. Longer-term planning, comparable to a new settlement, would be prudent in any case as the indicative layout is not readily suitable for extension. A rethink of the indicative plan might mean a different disposition of land uses and include a larger employment site (see ‘Q.12’) and more than one access to A465. In May 2023 a group of interested local residents submitted to MCC the accompanying diagram **ADCS 3** to illustrate how a relocation of A465 might enable better connectivity and placemaking to be arranged.*



Comments on HA1 compliance requirements:

Para a): We have objected to the low local provision of land for employment uses in answer to 'Q.12'. That might be addressed by the provision of more than 'the minimum of 1 ha' for B1 Use Class.

Paras a) final bullet point, d), l) and n): These related paragraphs fail to convey the essential need for one or more active travel routes between the site, the station and the rest of the town of a quality that will ensure their appeal as an alternative to car use. That quality will depend on such factors as them being direct, free-flowing, sheltered and meeting Welsh Government ATAG requirements (of which paras 7.6.3, 4, 7 and 8 and Appendix G DE626 are among the most relevant). Suggestions that are based on toucan crossings on A465 and an extension of the station bridge (stepped ramps and/or lifts but under some cover) do not seem to provide that quality. We recognise that the costs of better standards will be high, but consider the early provision of effective active travel infrastructure is essential even if it requires novel funding arrangements (see above).

Para f): Agreed but this paragraph or another should define a contour above which there should be no built development. The indicative plan shows development rising to a backdrop of new and thickened hedgerows/woodland on about the 120m contour. If roofs do not obscure that strengthened backdrop the maximum base level of homes is likely to be close to 110m that we have proposed and the visual integrity of Ysgyryd Fach will be sufficiently protected.

The compliance requirements should make it clear that the size of the neighbourhood centre should comply with Policy RC4 and not threaten the strength of the town centre. The indicative plan suggests that the neighbourhood centre may be oversized.

Object to Policy HA5: We object to this housing allocation as it conflicts with the purpose of Policy GW1 and because of its elevation and noise from the adjoining electricity substation. This objection should be considered together with our response to 'Q.4'.

It is clear, both on the Inset Proposals Map and when viewed from the surrounding hills and some parts of the town, that this site for 100 houses intrudes into the logical buffer of fields between the settlement boundary and the National Park boundary. The present settlement boundary at about the 120m contour would appear to have been established since the 19th century by a track and stream in this part of Mardy and in adjoining Abergavenny by planning decisions in the 1950s. The proposed housing site rises from below 120m to nearly 150m, leaving only a few metres of Green Wedge before the National Park boundary. We do not consider that lower building densities or extensive GI on the higher parts of the site will sufficiently integrate development into the landscape.

Active travel from the centre of the site at 135m elevation would descend 75m to the shops in Frogmore Street, in a distance of about 1.7km – about 20mins walking at 3mph, but taking more time for the steepening return.

[Note: A plan has been displayed during the consultation period, though not one of the consultation documents, that shows almost all the housing confined below about 137m with extensive



*planting/acoustic buffering near the substation and 44% of the site as GI. **Should our objection to HA5 fail, these constraints must be conditions applied to the development and the upper part of the site must be included in the Green Wedge. See plan ADCS 1]***

Alternative sites:

We recognise that if this site is rejected the strategy requires other land for about 100 homes to be allocated at Abergavenny/Llanfoist, preferably available for early development. The published Candidate Site assessments provide little information on the options but we consider those most likely to be acceptable, wholly or partly, are CS0108 (North of Hillgrove Avenue), CS0164/0249 (Adjacent to Red Barn Farm), CS0250 (Land at Evesham Nurseries) and/or CS0267 (Waterloo Court).

**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:

S10 with comment; E1 but with objection to explanatory text

Objection:

E2

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

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

Policy S10: The number of hectares may need amendment according to the outcome of our objection to Policy EA1 ('Q.12')

We support Policy E1 but wish for amendments to paragraphs including 6.1.3, 6.3.10 *et seq*, and 16.1.1 which mislead the reader regarding the numerical relationship between the number of homes to be built and the number of extra jobs likely to be created in the county.

The Plan's job creation target, seemingly derived from the work of consultants and based on assumptions of housing growth, household characteristics and a wish to reduce net out-of-county commuting to work, has varied considerably during plan preparation, and has always led to a Society objection. We note that the Deposit Plan, like the preceding Preferred Strategy, will 'support job growth of up to 6,240 additional jobs over the Plan period.' This number does not appear in any policy but is referred to in explanatory paragraphs that we consider need amendment.





We sense that the Council now recognises that the number is highly aspirational, and accepts that, unlike housing targets, the planning authority has very limited influence on whether employment targets are achieved except by ensuring an adequate supply of land and labour. Apart from reference to ambitious regional and local economic growth strategies, little or no evidence is put forward to support the achievability of up to 6,240 extra jobs between 2018 and 2033, and we believe that this seemingly precise number should not be used in a statutory development plan.

StatsWales figures for employment in Monmouthshire are available 2001-2019; they vary widely from year to year, but with an upward trend. That might be summarised as an increase from about 43,000 to about 47,000 over 18 years, or 220 pa. Growth of 6,240 2018-2033 would mean an average of 416 pa. The Council's discussions with local businesses suggest that growth has been restrained by a lack of land (despite substantial unused allocations in some areas) and labour, and the Plan is intended to address this, but we are aware of no evidence to demonstrate that the county's business prospects are so much better than during the past twenty years. An average annual employment growth of 220 pa would mean 3,300 over fifteen years; 4,000 would be optimistic but more realistic than 6,240.

The plan should say that it provides for employment growth of between a trend-based number of about 3,300 extra jobs and the Council's ambition that up to about 6,250 extra jobs are created. We hope that it will be possible to monitor employment change to test the outcome of these figures.

Of course, we wish the Council well in their search for accelerated employment growth; if necessary, unforeseen land and infrastructure needs would have to be addressed by plan modifications or departures.

Objection to Policy E2: Arising from our objection under 'Q.12' we consider that this policy will prevent approval of a non-allocated employment site at Abergavenny (or at any other settlement that is short of available allocated employment sites) if it can be demonstrated that the proposal can be accommodated on existing or proposed industrial or business sites within the County.

The policy is similar to Policy E2 in the Adopted LDP, with the same introduction in Para 16.6.1 and is intended to ensure that non-speculative single site employment enterprises take up available allocated sites. A consequence of sub-para b) is that a development covered by this policy wishing to locate at Abergavenny, where there is no suitable allocated land, would be required to take up an allocated site elsewhere in the county. We consider this to be contrary to the interests of Abergavenny/Llanfoist.

Condition b) should either be omitted from the policy or 'Condition b) may not be applied where the proposal meets a need for a large employer in a part of the county lacking allocated space' should be added. The reference to large employer enterprises in para 16.6.1 is unnecessary as the policy clearly applies to all proposals for such employment development in open countryside, consistent with Rural Enterprise policies.





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

Is your representation in support or objection?

Support:

EA2

Objection:

EA1 in respect of Abergavenny

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

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

(Note that Para 16.3.1 should refer to Policy S10 not S12).

Objection to Policy EA1: We object to the small amount of land (less than two hectares) allocated for new industrial and business use at Abergavenny in Policy EA1.

This may be because landowners have not put forward Candidate Sites and we note the footnote to Policy S2 and the flexibility of EA1k, but the very limited provision could deter interest in substantial employment creation at Abergavenny. Policy E2 is inadequate because an unallocated employment site can only be permitted if the use cannot be accommodated on existing or proposed industrial or business sites elsewhere in the county (see objection under 'Q11'). The present availability of the vacant Avara building and offices in the town centre, the former hopefully protected by Policy E1, does not weaken the need for more land and buildings for business development.

Options for an increased allocation include within HA1 mixed use site (possibly extended), and a westward extension of the Avara site.

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:

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

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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



There seems to be some overlap between Policies C13 and C14. Policy C14 is welcomed for its improved clarity in comparison with Policy DES2 in the Approved LDP.

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

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

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

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

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

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

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

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

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

Do you consider that the Plan is sound?	Yes:	
	No:	x



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

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

☒

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

☐

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

☐

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

☒

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

It is the Society's opinion that the Deposit Plan that is the subject of this consultation is not yet sound. This is primarily because matters of strategic importance have not been resolved. Despite this seemingly being procedurally difficult, the LPA has given assurances that these matters are being addressed and will be resolved before a Plan is Adopted. This would appear to rely on the goodwill of the Inspector and further consultation.

We have expressed doubts whether the LPA's failure to consider representations at the Preferred Strategy stage (the Regulation 15/16 pre-deposit consultation?) was procedurally correct, especially in terms of compliance with the Delivery Agreement. This consideration was postponed until the Initial Consultation Report was made available with the present consultation (Regulation 17). We have somewhat reluctantly accepted that the Deposit Plan is in general conformity with Future Wales because the Welsh Government endorsed the Preferred Strategy.

We consider that Tests 1 and 2 are generally sound though there are some evidential deficiencies such as the reason for the housing 15% flexibility allowance, assumptions about the household characteristics of in-migrants, and employment growth expectations.

At present our soundness concern centres on Test 3. Apart from monitoring, none of the questions are fully answered. We can accept that the Plan will have some loose ends that will not unduly affect the plan's effectiveness, but, as an example, a major re-examination of the plan's strategy will be necessary if Policy HA1 is not shown to be financially viable and satisfactorily integrated with the rest of Abergavenny/Llanfoist.

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:	Subject to any need to respond to proposed plan changes
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	yes

Part 5: Welsh Language

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

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



Guidance Notes

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

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

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

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

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

Tests of Soundness

Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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



New or Amended Sites

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

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

General Data Protection Regulation (GDPR)

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

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

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

As the Society is a group of about 100 members, all of whom have been consulted on the principal views expressed in this response, we have not completed the questions on the remainder of this form.

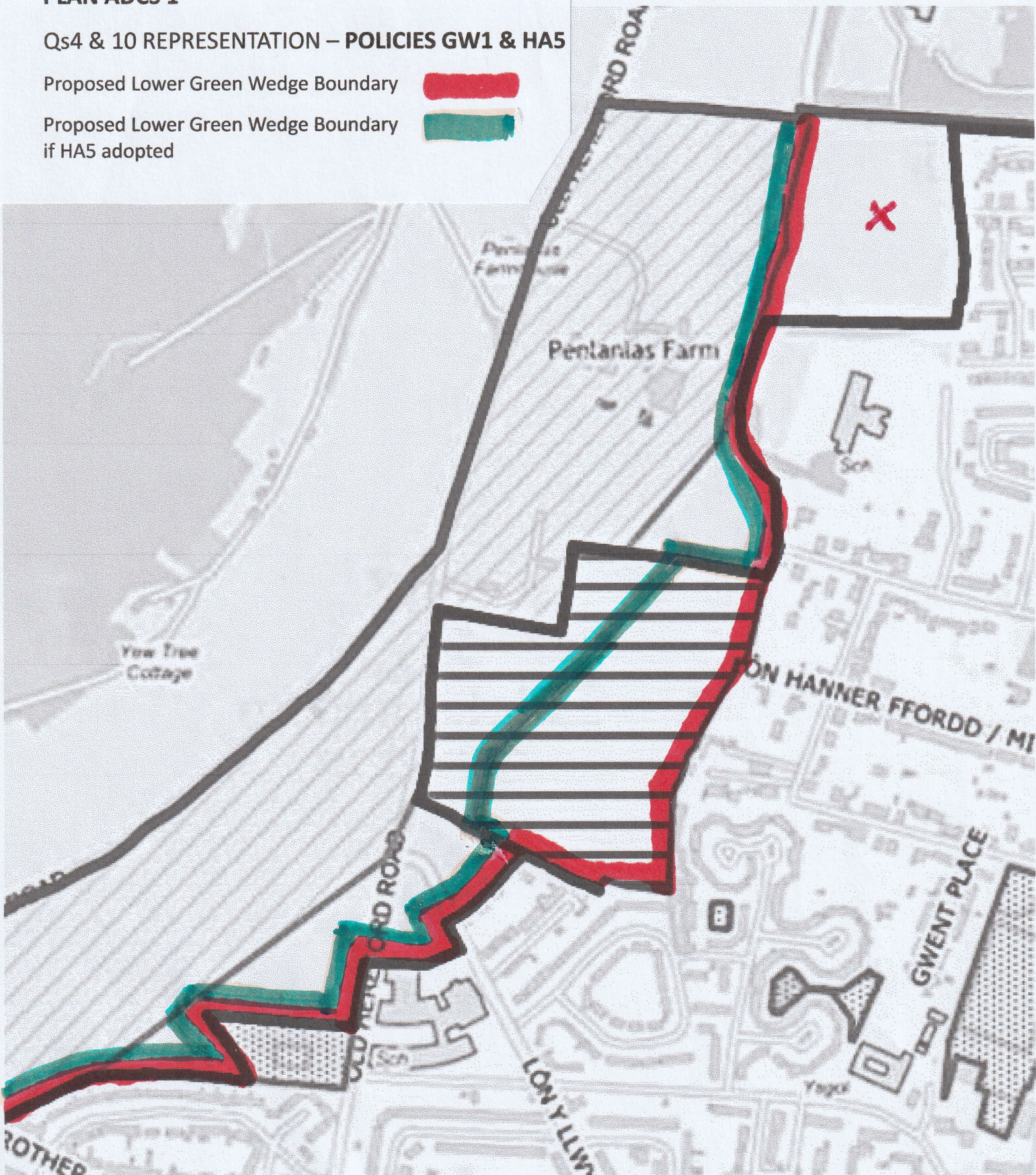
PLAN ADCS 1

Qs4 & 10 REPRESENTATION – POLICIES GW1 & HA5

Proposed Lower Green Wedge Boundary



Proposed Lower Green Wedge Boundary
if HA5 adopted



Abergavenny and District Civic Society

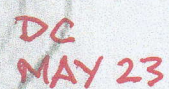
PLAN ADCS 2

Q10 REPRESENTATION – POLICY HA1

Suggested Revision of Site Boundary 



Suggested Diagrammatic Scheme 2023



1376

Abergavenny Transition Town



**Office
Use Only**
Representor
Number

.....
...1367...
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

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

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

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

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

planningpolicy@monmouthshire.gov.uk.

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

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

Part 1: Contact Details Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

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





Email:



Part 2: Your Representation

Office
Use Only
Represent
tor
Number

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

Para 3.1.1 and Objective 9:

There is no evidence provided in your documentation that demonstrates that planning policy on new homes provision through private sector development can lead to a rebalancing of a county's demographic make-up. We would suggest this is an unrealistic objective and should be written out of the plan.

However we do agree that having a more balanced demographic in the County is a worthy objective. It simply needs another method of achieving it.

Given that you quote the average house price in Monmouthshire is now standing at £400,496 and also that private renting costs in the county are also unreasonably high, then the only way to ensure younger people and young families either have the opportunity to stay or come into the community is to ensure the substantial provision of controlled 'social rent' housing is provided either direct from the Council or through an RSL in contractual agreement with the Council to provide such homes. (WG policy and funding support for this will be needed. Currently WG policy is in favour of such a strategy). The current Council has committed itself to a commendable rule whereby all new private housing developments have to commit 50% of the homes to being 'affordable'. We would suggest that 'social rent' should be the expectation. 'Affordable' in housing developer's terms tends to mean they are 'un-affordable' to those most in need.

In line with that rebalancing of the demographic the RLDP should indicate its impact on school places provision and how that will be met within the plan. This is particularly of importance to the sizeable proposed strategic site of 500 homes proposed for East Abergavenny not only for school place provision but how to access them avoiding if possible the use of parent's cars.



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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

Abergavenny Transition Town (ATT) is in agreement with some of the Deposit Plan draft observations made by the Abergavenny & District Civic Society namely that *'We are aware that representations may be made against housing proposals in other parts of the county'.... 'we would object to any proposals that significantly increase the housing requirement'... as... 'it would not comply with government policy'...and it would... 'put excessive pressure on infrastructure and be of more questionable deliverability. We would also object to any diversion of housing growth to Abergavenny from elsewhere in the county above what is proposed'.*

However ATT suggests it would be short-sighted not to realise that once planned development occurs on the East Abergavenny site on the eastern side of the A465 that almost inevitably pressure will mount after 2033 to enlarge that site along the A465. This expectation should form part of the master-planning at this stage, setting absolutely clear limits and boundaries. It may also be a reality that to fund the proper level of active travel infrastructure to connect East Abergavenny properly into the existing settlement, with an appropriate level of service provision, public landscape and employment opportunities, it may be that an enlargement of this East Abergavenny site should be master-planned in at this stage. The high front-loading capital costs might be more easily accommodated by taking account of this larger development potential.





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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

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

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





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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

S3 PM1 (a) : This proposes that to *'create well-designed places'* developments will be required to *'respect the existing form, scale, siting, height, massing, materials (including colour) and layout of its setting'*.

There is a danger that the word *'respect'* come to mean copy, mimic or simply repeat what exists, and yet one of the absolute defining place-making characteristics of Abergavenny is its lack of consistency, its lack of repetition on many of these aspects and its almost Heinz 57 varieties of architectural vocabularies that have shifted over the last two centuries in particular in the light of building technology, social need, changing patron expectations and general public culture in architecture. While maybe height and massing in any particular location should be the respectful concern of any decent architect/builder, does the determination to respect all the other qualities simply mean we repeat (often without understanding) what we know, because we lack the architectural judgement schemes and thus nothing develops further than repeating what exists; no other option seems possible in this policy. (just one example; such a policy would exclude the positive sustainability qualities of timber as a structural and external material in any housing development.) Is this policy approach as written not contrary to continuing the *'distinct character'* of some places that the planning policy ask us to respect? As the submission of the Abergavenny & District Civic Society (A&DCS) draft submission suggests *"This variety is a strength that allows a more flexible application of policy than in some other parts of the UK"*.

S3 para 8.1.2 suggests that it is essential that all developments are *"green infrastructure led"* but there will be development contexts in the existing settlement that will have virtually no green infrastructure (other than say for example back gardens in a terraced housing context maybe).

The problem is in the term *"green infrastructure-led"*, whereas what would be a better approach might be that the quality and amount of green infrastructure will vary considerably to differing degrees across any place in any settlement, and that any new development on its site should work to extend and empathise with the particular qualities of that existing distinct landscape.





There is possibly some confusion in terms being used. In new housing area developments, it has long been good practice that any layout should be 'landscape-led' in the sense that landscape considerations should govern the form of the masterplan rather than maximising the number of homes or creating the cheapest road layouts. This was a counter to the often total exclusion of any natural bio-diversity being considered in modern developments by the volume house-builders. Landscape/ Green Infrastructure should be an appropriate part of any place- making action, looking to extend the green infrastructure qualities of what is already there.

.....

Again we are in agreement with the A&DCS draft observations when they write....*Policy HE1 is supported but we note that it omits Adopted LDP policy that 'good modern design may be acceptable, particularly where new compositions and points of interest are created.' This may be felt unnecessary in HE1 but something similar may be helpful in the accompanying text. Like 'high quality design', 'good modern design' needs to be defined. New styles and sustainable materials can add to the variety and quality of the county's Conservation Areas more than a design that references traditional characteristics'.*

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

S4 NZ1 paras 9.2.2 – 9.2.6

A member of Abergavenny Transition Town (ATT), [REDACTED] (an expert in the field of net zero carbon homes and other related fields of climate change constraints) has submitted comments on the Deposit plan. These below are copied from his submission. We endorse his observations, comments and suggestions.

"The requirement for all developments to submit a full operational energy strategy is very good. I do not support the RICS aligned format as this is more about whole life carbon and embodied energy - which is a movable feast and hard to decipher. It is also not a common format for building professionals. A full SAP/HEM aligned assessment would be more



normal, much easier to analyse/compare and would align with Building Regulations. This is how we currently assess energy strategies in Ealing and Greenwich (GLA). I would also strengthen this by saying that in the spirit of the Construction Safety Act 2023, the assessment must be authored by a qualified named professional/the principal designer.

25kWhrs/m2/yr is a good target, but will need to be calculated/certified using SAP/HEM.

Onsite renewables needs more definition. Does this mean electricity or heat? By some (now less favoured) definitions heat pumps 'create' renewable energy by being more efficient than a gas boiler/direct electric, but this is rather a backwards way of looking at things for a world where gas boilers are no more. A clearer, simpler definition would be better. I would suggest 40kWhr/m2fp/yr or the regulated energy demand (whichever is the greatest) of renewable ELECTRICITY. For a typical 10m by 7m floor plan house 40kWhrs/m2fp/yr would be a PV array of 10mx7mx40kWhrs/m2fp=2400kWhrs/890kWhrs/kWp=3.1kWp, which should be easily achieved. A normal domestic PV array is 4kWp.

Electricity required for cooling - now a Part O requirement, should also be counted as regulated energy.

EPC of A - well of course!

No gas grid - again, of course and 2025 Building regs will not allow it anyway as there will be no way to pass Building Regulations with a gas boiler.

ULEV charging - Building regs are going to require this anyway - so better to realise this at the planning design stage.

The as built report is the key part and must be strongly enforced as a pre occupation requirement. i.e. - no one can move in until it is approved. This again needs to be a full SAP/HEM as built report and authored by a qualified named professional/the principal designer. At the moment I don't feel the wording is strong enough.

The draft policy has not gone as far as asking for an 'Ealing Condition' or the GLA 'Be Seen' policy by asking for monitoring for the first 3 years after handover. An easy half way house would be to require the monitoring of just renewably harvested electricity (PV/wind). This is technically very easy and low cost. Meters on PV arrays/wind have to be provided anyway, all the LA would be requiring would be for the use of SIM meters and then the SIM card data to be sent to them for the first 3 years to show that the arrays were actually switched on. In





our experience PV arrays are often left turned off at hand over, the developer only being checked for installing an array but not making sure it operates.

Finally there is no stick for non compliance. In the GLA there is a carbon offset calculation that is paid for the shortfall to zero carbon. This is priced so that it is more cost effective to save the carbon on site than pay the offset. Most GLA schemes now over achieve (the target is a 35% reduction on Building Regs but most developments now get to around 50%). The advantage of having this financial stick is that when developers do not deliver the carbon saving they promised in the planning application, intending to just ignore any enforcement action, there is an easily enforceable legal financial penalty.

.....
S4 9.5 Local Search Areas (renewable energy generation).

Acknowledging the County's seriously researched investigation on sites for possible renewable wind and solar generation sites in the County, the conclusion from this and its policy implications are profoundly disturbing and should be revisited.

Policy CC3 sets out parameters for any renewable energy generation development that is essence would make it almost impossible to meet all those demands. Given the seriousness and pressing urgency to make fossil fuel cuts of 40% by 2030 this policy as it stands seems to be sticking our head in the sand. The major argument seems to be again, protecting that "distinct character" this time of the Monmouthshire landscape, as though it has never changed, and should not be changed, and ignoring the fact that we are about to see potentially in the very near future the largest shift in local food production and farming for a century or more. The principal argument against Renewable Energy Generations sites in the county is because Monmouthshire has "the Best and Most Versatile Agricultural land".

But first this land is not being used in a very versatile way, given its massive propensity to be livestock grazing dominated and then using land providing feed for those livestock. Second it is not an efficient use of productive farmland either in the light of the number of those employed on the land and the volume of potential food produced per hectare. Horticulture is far more productive on good quality land. But equally there is no consideration that there are formats of PV installation and windfarms that can allow agricultural usages of the land to continue even with livestock grazing.

It seems the only renewable energy generation site of serious consideration is one of 16Ha on a County Council owned site at Raglan Enterprise Park. Surely we should be looking, as Llangattock Green Valleys are doing in Powys for the communities around Crickhowell, to have sufficient renewable energy generation locally to power all those settlements by renewably generated electricity.

ATT have argued consistently that since Monmouthshire is largely a rural agricultural County, planning policy must have as its core some underpinning of likely progressive future developments in agriculture particularly in the light of likely climate change impacts on food security from locations we have too much relied on in the past. (the same also applies to sites for onshore renewable energy generation.)



But planning policy towards the rural has largely been to simply preserve the status quo and as a general principle resist all development and chances for increased employment in the rural economy. A prime example of this is over the issue of Rural Enterprise Dwellings, where there are very tight restrictions instead of a policy that welcomes rural workers homes.

As has been well put in the A&DCS draft submission on the Deposit Plan....

“Request for a commitment to adopt supplementary guidance on Horticultural Rural Enterprise Dwellings.

“At the Preferred Strategy consultation stage the Society suggested ‘that there is a need for a strategic policy, amplified by a management policy and/or SPG, that responds to changes in farming and horticulture that are increasing the demand for small new holdings accompanied by an appropriately sized tied dwelling on-site or very nearby. The present LDP makes no reference to One Planet Developments and recent applications have been assessed against rigorous Welsh Government guidance, but we believe that there should be a wider enabling policy for new labour-intensive fruit and vegetable-growing holdings of less than, say, 10ha. We recognise the challenge of devising a policy that meets a growing need of the rural economy without reversing decades of refusing most new agricultural dwellings. That policy reflected the increasing size of farms, the reduction of the labour force, and the need to protect open countryside from unnecessary new housing that was liable to be converted and enlarged with unrestricted occupancy in unsustainable locations. As part of its response to the climate emergency, planning policy now needs to contribute to enabling a return to smaller holdings serving local communities in acceptable locations and subject to strict conditions to prevent abuse.’

This comment was based on awareness of work on a 2023 research report on planning issues regarding such dwellings in the National Park, Monmouthshire and Powys. Since then, Powys CC has adopted guidance on the matter to amplify PPW12 and TAN 6 and their Preferred Strategy consultation lists this as a New Policy Area for Consideration. This representation seeks amendments to Para 12.5.2 and Appendix 11 of the Deposit Plan.

It should be noted that Welsh Government is grant funding a pilot project in Powys to divide up one of their County Farm into small holdings with accompanying dwellings for those small holders. WG subsidies for horticulture production or establishment, and potential changes at WG level on policy for RED's, are both under active discussion.



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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

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

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



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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

While we support in principle Policy HA1 we object strongly to the insufficient level of master-planning detail evidenced in the Deposit Plan for this East Abergavenny site. It fails to provide a convincing solution to ensuring this new bit of settlement can be thoroughly integrated socially and physically with the existing settlement and its services. The current site boundary proposals are too constrained by current landownership boundaries. Planning should look beyond that to provide a more rounded solution.

If this viability is not demonstrated convincingly now, then should it fail in terms of its financial viability or be badly compromised at a later date through insufficient master planning at the next PAC stage of planning, then this would simply and sadly demonstrate the flaws in selecting this current strategic site in the Deposit Plan. (Para. 4.2.20 of PPW12 requires the financial viability of housing sites to be assessed prior to their allocation in the plan. Key sites such as HA1 require 'a site-specific viability appraisal through the consideration of more detailed costs, constraints and specific requirements'.) If this becomes unachievable then the whole homes-distribution strategy within the county under the deposit plan becomes unworkable.



While one can see that each candidate site selected across the county has been graphically treated to the same level of master-planning, we strongly suggest that the true viability, financially and physically, of the East Abergavenny site demands more master-planning detail to make it convincing as a workable plan, particularly on the matter of active travel routes across the A465 and the railway, well connected to existing active travel routes into town, and hopefully also served by a full public transport interchange at the station that should form part of the master- plan. These should be all in place when the first new homes are occupied. This requires considerable forward investment. The Deposit plan should insist this is all in place as a condition of any future planning application. But will such a reasonable insistence frighten off any development investor. Should MCC be approaching WG to support the proper working up of the masterplan proposal and the infrastructure investment it will require?

Note that in our answer to Q2. we point out the need to recognise further development pressures will occur post 2033 for this area of East Abergavenny and these should be master-planned for now. To do this now might also provide better connections to the old Monmouth Rd.

We would also suggest space for employment provision on this site should be expanded.

It is not acceptable to leave further detailing of this East Abergavenny site to pre-application master- planning and consultation.

Further Comments on HA1 compliance requirements:

ATT support the following comments made by the Abergavenny & District Civic Society draft submission... namely...

Paras a) final bullet point, d), l) and n): These related paragraphs fail to convey the essential need for one or more active travel routes between the site, the station and the rest of the town of a quality that will ensure their appeal as an alternative to car use. That quality will depend on such factors as them being direct, free-flowing, sheltered and meeting Welsh Government ATAG requirements: paras 7.6.3, 4, 7 and 8 and Appendix G DE626 are among the most relevant. Suggestions that are based on toucan crossings on A465 and an extension of the station bridge (stepped ramps and/or lifts but under cover) do not seem to us to provide that quality. We recognise that the costs of better standards will be high, but consider the early provision of effective active travel infrastructure is essential even if it requires novel funding arrangements.

Para f): Agreed but this paragraph or another should define a contour above which there should be no built development. The indicative plan shows development rising to a backdrop of new and thickened hedgerows/woodland on about the 120m contour. If roofs do not obscure that strengthened backdrop the maximum base level of homes is likely to be close to 110m and the visual integrity of Ysgyrd Fach sufficiently protected.

The compliance requirements should make it clear that the size of the neighbourhood centre should comply with Policy RC4 and not threaten the strength of the town centre. The indicative plan suggests that the neighbourhood centre may be oversized.

.....



Object to Policy HA5:

The proposal for this site of 100 homes seems to contradict and undermine the carefully thought-out Policy GW1.

There appears to be conflicting information in the public domain as to the contour line defining this development and how it relates to the National Park Boundary.

The proposal in the Deposit Plan suggests development up to 150m contour leaving only a few metres of landscape between the development and the National Park Boundary. This clearly flouts the policy GW1. (another proposal for this site in the public domain, but not included in the Deposit plan, shows the development only up to 137m contour with a green wedge of extensive planting between it and the National Park Boundary.) While should this site be given the go-ahead, this would be a better plan and more consistent with Policy GW1, we would suggest that in Active Travel terms the contour rise from the Frogmore Street / High street retailing area of Abergavenny of 77 metres over a distance of 1.7km will be a major disincentive to cyclists and pedestrians whose homes might be on this site. It might be a better to option to locate these 100 homes across alternative sites or as future additions to the East Abergavenny site.

Should both these options not approved within the deposit plan then alternative sites for allocations of these 100 homes could be possibly found at CS0108 (North of Hillgrove Avenue), CS0164/0249 (Adjacent to Red Barn Farm), CS0250 (Land at Evesham Nurseries) and/or CS0267 (Waterloo Court).



**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:

support

Objection:

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

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

S10:

The very precise employment numbers of 6,240 additional jobs over the planned period in relation to the number of new homes, even though they were the outcome originally of commissioned consultants findings, are surely illusory in their precision. The employment figures fluctuate considerably over time, so to use one in an official deposit plan is surely not wise; it needs a range of figures recognising the uncertainty and the lack of planning's ability to control these matters;

But the one consistent demand around Abergavenny appears to be for small and medium light industrial units. Most are fully occupied currently.

The proportion of land allocated to these on the East Abergavenny site maybe insufficient. The opportunity ought to be taken to use them with copious landscaping to act as a linear buffer zone against the traffic noise from the A465.

The closed Avara site at the Hardwick roundabout outside Abergavenny should be investigated for its maximum potential beyond existing boundaries, and within of course flooding constraints from the river Usk. Developers should be encouraged to flexibly develop a wide range of adaptable volume industrial units and equally importantly to provide an active travel route beneath the A465 connecting the site to the residential areas of the town.

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

Support:



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

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

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



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

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

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



--

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

Is your representation in support or objection?

Support:

Objection:

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

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

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

Do you consider that the Plan is sound?

Yes:

No:

No

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

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

☐

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

☐

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

☐

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

☒

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

Until the East Abergavenny site for 500 homes is master-planned more fully and checked for investment viability relating to up-front public transport and Active Travel infrastructure costs to fully integrate the site with the existing settlement, the whole County Wide



strategy on homes development is in jeopardy. Being the one settlement in the County which has a railway station and this East Abergavenny site being closeby (but for the moment inaccessible to that station) this site has to be a good strategy but it must be physically / financially viable and not settle on the cheapest solution to achieving that proper integration.

Part 4: Appearance at Examination Hearing Sessions

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

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

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	
	No:	No
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	

Part 5: Welsh Language

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



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



Guidance Notes

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

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

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

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

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

Tests of Soundness

Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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



New or Amended Sites

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

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

General Data Protection Regulation (GDPR)

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

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

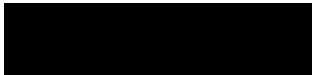
The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who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

1765

National Grid Electricity Transmission (NGET)



Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ



avisonyoung.co.uk



Our Ref: MV/ 15B901605

10 December 2024

Monmouthshire County Council
planningpolicy@monmouthshire.gov.uk
via email only

Dear Sir / Madam
**Joint Local Plan Pre-submission Publication Version Regulation 19 Consultation
November – December 2024
Representations on behalf of National Grid**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Reference	Asset Description
W3h Existing Llanfoist Civic and Transfer Station	4YU ROUTE (TWR 1 - 153): 400Kv Overhead Transmission Line route: 4YU ROUTE (TWR 1 - 153)

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only.

Please see attached information outlining further guidance on development close to NGET assets.

NGET also provides information in relation to its assets at the website below.

- <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET infrastructure.

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Therefore, to ensure that Proposed Policy PM1 Creating Well Designed Places is consistent with national policy we would request the inclusion of a policy strand such as:

"takes a comprehensive and co-ordinated approach to placemaking, including respecting existing site constraints including utilities situated within sites."

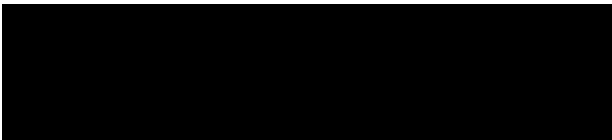
Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:



Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

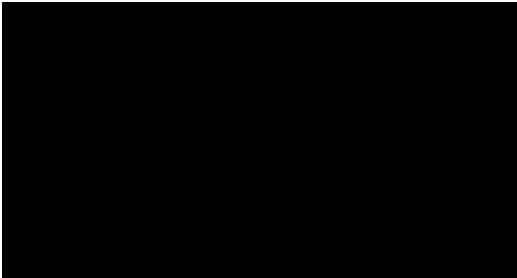


National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA



If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

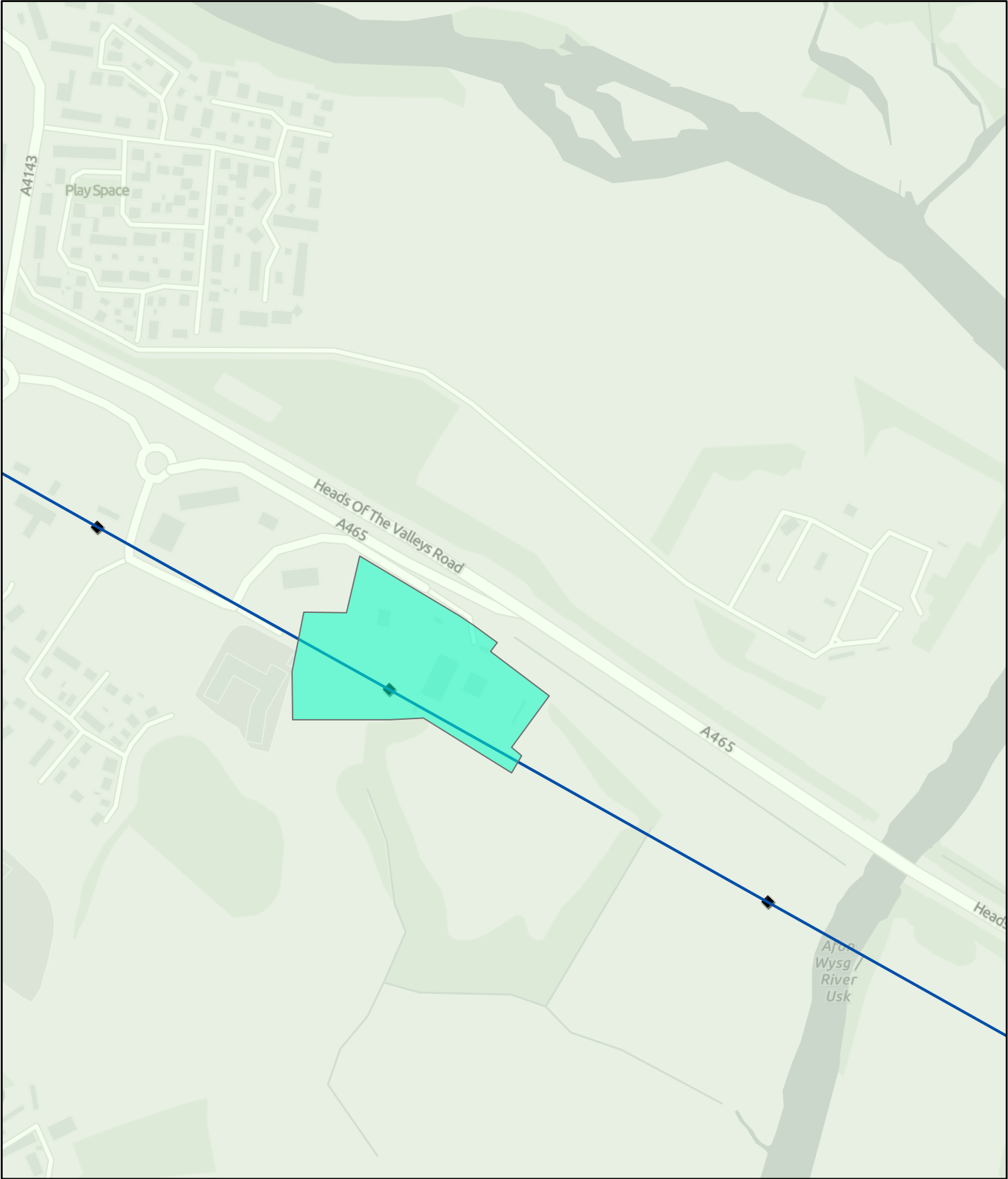
NGET's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

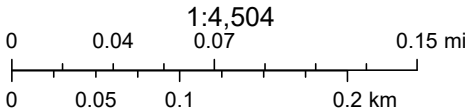
For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

W3h Existing Llanfoist Civic and Transfer Station



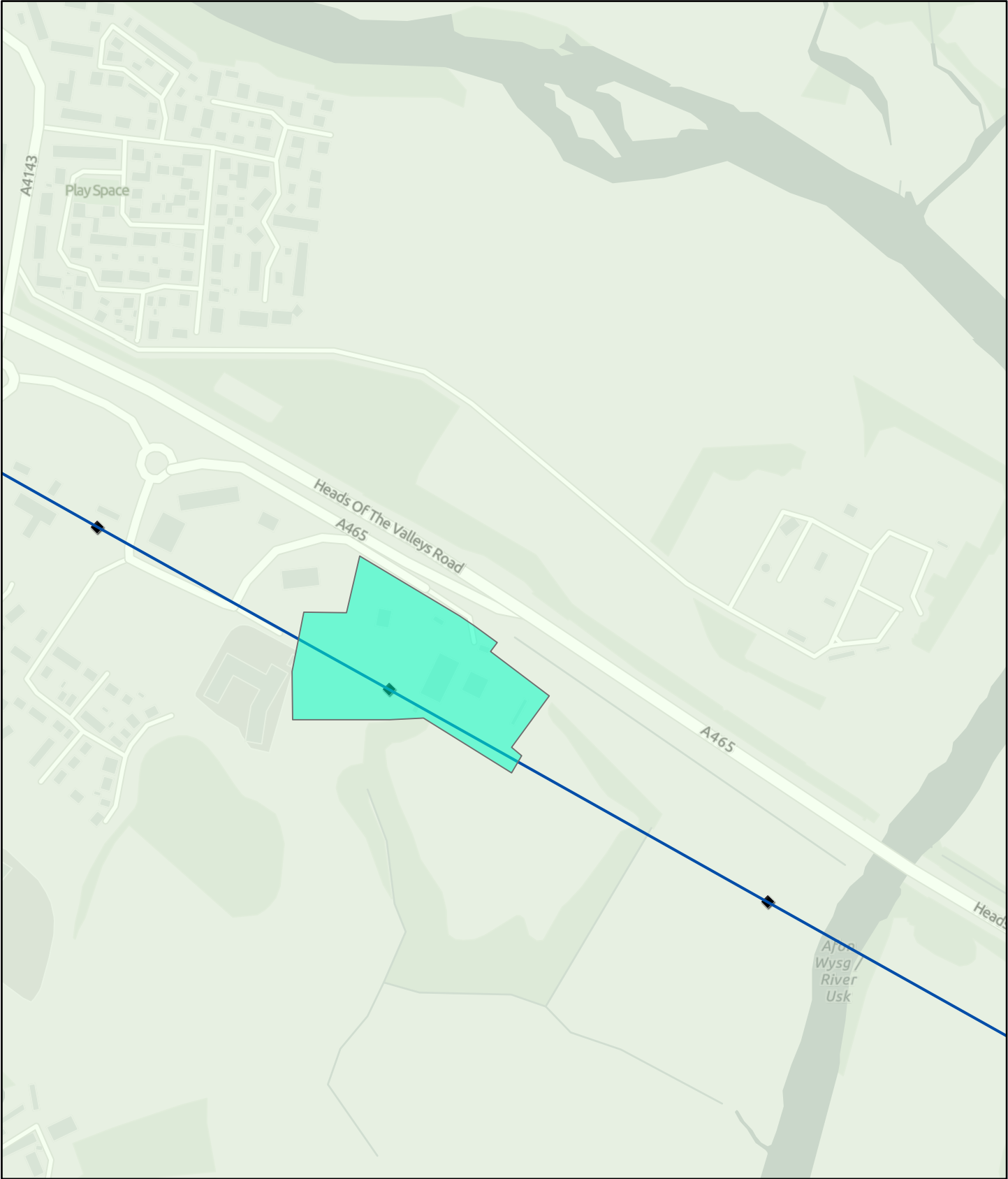
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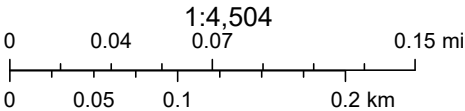
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Electric_Assets_1587

Development_Plan_Monitoring_v2_977



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1787

Gwent Wildlife Trust



planningpolicy@monmouthshire.gov.uk

15th December 2024

Re: Monmouthshire County Council's Replacement Local Development Plan (RLDP)

Dear Sir/Madam,

Gwent Wildlife Trust (hereafter referred to as GWT) have reviewed the recently published Replacement LDP, and welcome that consideration has been given to the preservation of important habitats/species, with a number of candidate sites having been filtered out prior to the production of the Replacement LDP, this included those that directly impacted upon Priority Habitats and Sites of Importance for Nature Conservation (SINC). However, we still retain concerns regarding a number of sites and would also like to make more general comment regarding future surveys, mitigation and environmental enhancements that could be made.

General Comments

GWT recognises that there is a need for development, and particularly housing in Monmouthshire. However, these proposed sites need to be surveyed, designed, and landscaped carefully, as the Local Authority has a duty under Section 6 (Biodiversity and Resilience of Ecosystems Duty) of the Environment (Wales) Act 2016 to maintain and enhance biodiversity. This means that adverse impacts should be avoided in the first instance, and if unavoidable, then the levels of mitigation/compensation will need to be of such a level that there would be no net loss of biodiversity as a bare minimum, and ideally enhancements should be made. It is crucial that when assessing impacts, that it is not just the footprint of the proposals, but also impacts on adjacent habitats, and the cumulative impacts of numerous proposals across Monmouthshire need to be considered.

It is understood that ecological surveys have been undertaken to inform the LDP to this stage, these are not publicly available so we cannot comment on these. GWT hopes that further survey work will be undertaken before developments are taken forward and that these be made available for comment. GWT stresses the need for these to be carefully planned, undertaken by suitably qualified individuals, at the correct time of the year, and with the necessary survey effort. We would like to stress that these surveys may need to extend beyond the proposed sites boundaries to ensure impacts on adjacent habitats are adequately assessed.





A number of sites in the south of Monmouthshire are within the 12.6km Recreational Catchment Zone for the Severn Estuary European Marine Site. For these sites, under the title of “*Green Infrastructure, Landscape and Nature Recovery*”, it says they must comply with the following:

“The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.”

This above appears vague, with just a requirement to “consider” an unspecified financial amount, and it would appear the SANG has yet to be published, so it is difficult to pass comment as to the suitability of this guidance. This creates doubt as to whether increased recreational pressure of the estuary could be effectively controlled.

Should various proposals ultimately be given planning approval, the Planning Authority needs to ensure that the conditions they place associated with planning approval will afford the opportunity to make further enhancements for biodiversity, and hopefully produce exemplar developments. Obviously planning conditions will vary from site to site, however there are certain actions that could be implemented at many sites, these include:

- Swift (and other bird) Nest sites incorporated into new housing and other structures.
- Bat roost sites incorporated into new housing and other structures.
- Sustainable Energy (Solar Panels on roofing).
- Gaps in fencing to allow Hedgehog movement.
- Native, local provenance species in all landscaping/planting schemes.





Specific Proposed Sites

Policy HA2 - Land to the East of Caldicot/North of Portskewett

This is a considerably sized site mixed use development, with approximately 770 homes proposed.

It is noted that the boundary of the proposals extends right to the edge of the Nedern Brook Wetlands SSSI. It is welcomed that the western side of the proposals (that adjacent the SSSI) is not to be developed. However, we would like to stress the importance of there being no adverse impacts on the drainage, or water quality within the SSSI, as a result of the proposals, as this is a nationally important and sensitive wetland site. It should be noted that the formation of these wetlands is the result of complicated hydrological processes so that great care would need to be taken to avoid adverse impacts upon these <https://nora.nerc.ac.uk/id/eprint/514232/1/OR15038.pdf>. Also there needs to be measures in place to ensure the wildlife, particularly the wildfowl and waders that use this site are not subjected to increased levels of disturbance either during or post-construction.

It is welcomed that areas of broad-leaved woodland are retained within the site boundaries, or are outside of the site boundaries. However, with 770 houses proposed to be built there is likely to be greater levels of human disturbance, lighting, and additional predators (Domestic Cats) introduced into the general area, all of which could have adverse impacts upon the wildlife within these woodlands. We would therefore wish to see assessments of impacts considering these elements, extending beyond the proposal boundaries, and any mitigation/compensation measures proposed being suitably elevated to account for this.





Policy HA4, Leasbrook, Monmouth

This is a residential development, with 270 homes proposed.

GWT have been contacted by various concerned members throughout the entire LDP process to date. It is the above the site that has been the focus of the most concern, and we too share concerns regarding this site.

Concerns raised with us include:

- i. Loss of Prime Agricultural Land
- ii. Visual Impacts on the rural landscape at this Gateway to Wales
- iii. Flooding
- iv. Congestion in relation to the area around the existing Dixon Roundabout
- v. Safety concerns regarding increased traffic.
- vi. Water Pollution, particularly given proximity to the River Wye, which is of SSSI and SAC status.
- vii. The rumoured wish of the developer to not undertake an Environmental Impact Assessment.
- viii. Impacts on bats, specifically the Greater Horseshoe Bats associated with the nearby Newton Court SSSI Roost.

As our expertise lies with the last three of these, our concerns relate to these.

Water Pollution - In relation to the River Wye SSSI & SAC. It is well documented that the River Wye is an incredibly valuable and protected wildlife resource, it is also sadly well known over recent years that it is struggling with pollution being the main cause of this. For both these reasons it needs to be clearly proven that this development would not have any adverse impact on the water quality within the River Wye, as it is not in suitable condition to withstand further adverse impacts. This is of particular pertinence to the validity of the Habitat Regulations Assessment.

Environmental Impact Assessment (EIA) – This may be a case of wrongly interpreted information, however a number of people have expressed concerns that there has been a request from the potential developer to not undertake an Environmental Impact Assessment in relation to the proposal. This is surprising and GWT would like to state that we would expect a development of this size to require an EIA, for example a simple tree planting proposal over 5ha requires an EIA, therefore 270 houses over a 12ha site must surely trigger the need for an EIA.

Greater Horseshoe Bats - Our particular concerns lie with the nearby (1km north-east of the proposals) presence of the Newton Court Stable Block. This site was designated as a SSSI in 1998 due to it being a maternity roost for Greater Horseshoe Bats (at the time of designation being one of only 3 sites in Wales, although a small number of other sites have now come to light), with Lesser Horseshoe Bats also being





Gwarchod Natur ar gyfer y Dyfodol | Protecting Wildlife for the Future

present. It subsequently (2005) has received even higher European legal protection as part of the Wye Valley and Forest of Dean Bat Sites SAC (Special Area of Conservation).

It is noted that some bat surveys have been undertaken in recent years, which have noted Greater Horseshoe Bats to be present close to/within the proposed site boundary.

It is noted that the proposed development site boundary has been delineated 0.1km away from the Newton Court Stable Block. It is presumed that this is because it is the intention to keep development outside of the quoted “1km Core Sustenance Zone for Juvenile Bats”, this we believe is taken from the “North Somerset and Mendip Bats Special Area of Conservation (SAC) - Guidance on Development”. Firstly, it should be noted that this guidance, whilst having relevance, has been prepared in relation to a different SAC in a different country. Also, whilst the 1km Core Sustenance Zone (CSZ) applies to young bats, it should be noted that the adult (parent) bats within the Maternity Roost also require foraging areas, and the Bat Conservation Trust quotes the CSZ for Greater Horseshoe Bats as being 3km. We therefore believe that a 3km CSZ should be applied to all Greater Horseshoe Bats in connection to these proposals, based on the precautionary principle, this would fully encompass the proposed development site boundary.

Should the proposals progress, GWT regard it as imperative that adequate surveys are taken to confidently assess whether there is any reasonable likelihood of an adverse impact on Greater Horseshoe Bats both in terms of the integrity of the SSSI and the SAC. The latter of which is of particular significance as it may need to form a Habitats Regulation Assessment (HRA) with associated Appropriate Assessment.

The Revised LDP states the following in relation to International/National (Statutory) Sites and Protected Sites and Species:

“10.10.4 Consideration must also be given to the Conservation of Habitats and Species Regulations 2017 (as amended) in the context of both species protection and the potential impacts on sites in the National Site Network during the development management process. The Conservation of Habitats and Species Regulations 2017 also requires that development proposals likely to have a Significant Effect on a SPA or SAC are subject to an Appropriate Assessment.

10.10.5 Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site.

10.10.6 In line with the Habitats Regulations and in consultation with NRW, it will be necessary for project level assessments to be undertaken where there is a potential for significant effects on sites in the National Site Network.”





As such as any bat survey work will need to be of a sufficient design (appropriate timings, extent, and survey effort) to confidently assess that there would not be an adverse impact on the integrity of the SAC for the proposals to proceed. The mention of “Functionally Linked Land” in 10.10.5 is crucial within this, because if Greater Horseshoe Bats are utilising the land covered by the proposals, and the potential impact on these would be such that it could potentially impact the integrity of the SAC then the proposals may not be suitable for taking forward.

In relation to bat surveys the “Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan (AECOM , September 2024)” states that:

“It is recommended that the following text (or similar) is inserted into a suitable policy in the next iteration of the LDP: ‘To meet the requirements of the Habitats Directive regarding allocated greenfield sites within the Core Sustainment 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’.”

It is however not clear whether this has been inserted into the LDP as suggested, and it is our concern that adequate survey work may not be undertaken.



Policy HA9 (also Policy EA1L) - Land at Former MOD, Caerwent

This site is allocated for mixed use, residential and commercial, with approximately forty homes proposed.

It is understood that there is a Lesser Horseshoe Bat maternity roost at this proposed site, as well as a Dormouse population. It is noted that it is the intention to “*Maintain and enhance populations of protected and priority species including reptiles, dormouse, and the lesser horseshoe maternity roost through retention of existing habitat and appropriate buffer planting.*” This is naturally welcomed, however we would like to stress the particular importance of the Lesser Horseshoe Bat maternity roost, as these sites are especially crucial to the species survival, and there are only 170 such sites known in the UK. It should be borne in mind that Lesser Horseshoe Bats are particularly light sensitive, and even if habitats are maintained/enhanced, poorly designed lighting schemes can disrupt connectivity and make large areas of habitat no longer of usable. It should also be borne in mind that any housing scheme is likely to bring additional predators (domestic cats) to the area which could adversely impact upon the aforementioned Dormice, Lesser Horseshoe Bats, and reptiles. Because of this, should the proposal go ahead, any mitigation/compensation measures need to be enhanced to take account of these potential impacts. The maternity roost itself, and habitat links away from it will need particular protection.





Allocation EA1h – Gwent Euro Park, Magor

This is an employment allocation that is located within the Gwent Levels Site of Special Scientific Interest (SSSI). GWT's position is that there should be no development within any SSSI. We do however understand that there is already extant planning permission on this site. We would like to reinforce that should development proceed, that there needs to be stringent measures in place, together with adequate post-construction monitoring to ensure that the water quality is not adversely affected, as the whole Gwent Levels suite of SSSI is intricately, hydrologically connected, and both highly ecologically valuable and sensitive.

This also further reinforces that other developments on the wider Gwent Levels SSSI should not be granted planning permission, as so much has already been degraded/lost.

I would be grateful if you could keep me informed as to developments in relation to the LDP.

GWT reserves the right to make further representations in respect of any developments taken forward for Planning.

Yours sincerely,



Gwent Wildlife Trust

1819

Minerals Products Association



deunyddiau hanfodol
atebion cynaliadwy

essential materials
sustainable solutions

MPA Wales/Cymru

Penyfron Fron

Garthmyl Powys SY15 6SA

10th February 2025

Planning Policy Service
Monmouthshire County Council
County Hall,
Rhadyr,
Usk,
Monmouthshire
NP15 1GA.

Email: planningpolicy@monmouthshire.gov.uk

Dear Sir/Madam

MONMOUTHSHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN DEPOSIT PLAN (OCTOBER 2024)

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2016, the industry supplied £18 billion worth of materials and services to the Economy. It is the largest supplier to the construction industry, which had annual output valued at £169 billion in 2018. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document and for allowing us the additional time to respond to the document. While we are generally supportive of the aspirations within the plan, we remain unclear from where the mineral resources, reserves and associated mineral products will be derived to ensure these aspirations can be delivered.

It is disappointing that the requirement for a Statement of Sub-Regional Collaboration (SSRC) appears to have been kicked in to the long grass, despite the approval of the Regional Technical Statement 2nd Review, which required the production of an SSRC being over 4 years ago.

In the absence of an SSRC and only one site in the authority area, which is currently not operational, and no additional areas of search or preferred areas identified in the plan, it is unclear how the mineral requirements for the area are to be met

Para 22.1.3 of the plan refers to the 11.25 Mt permitted reserve at Ifton quarry. We understand that a significant proportion of this reserves lie below the water table. This is confirmed in the Mineral Background Paper in which paragraph 3.9 states that *'much of the limestone lies below the water table within a principal aquifer'*.

MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

Registered in England as Mineral Products Association Limited No. 1634996
Registered Office: Gillingham House
38 - 44 Gillingham Street London SW1V 1HU

The consequences of this constraint are not considered in the plan or in the background paper. Whilst our previous comments on production capacity within Monmouthshire have been overlooked, so has the potential consequence of the potential constraints on this reserve and the consequences of delivery of raw materials to meet the plan's aspirations.

Policy M1 - Local Building and Walling Stone

We support the wording of Policy M1, however, the final sentence of paragraph 22.2.1 should be deleted. It is unclear how material could be removed from sites without the use of heavy vehicles.

Policy M2 - Minerals Safeguarding Areas

Whilst in general we are supportive of the safeguarding policy, we question the need for the second part of subsection i) "*or that it would cause unacceptable harm to ecological or other interests*". The likelihood is that the permanent development would also impact upon these interests. These interests are addressed in other policies in the plan. This should therefore be deleted.

We would also suggest deletion of the opening text in 22.3.2 "*In most instances*". This does not add anything to the paragraph and may be factually incorrect.

Policy M3 - Mineral Buffer Zones. This is confusing separation distances and buffer zones. The buffer zone to be identified on the Proposals Map is drawn outwards from permitted or allocated minerals site. The policy should say simply that no new sensitive development will be permitted within minerals buffer zones identified on the Proposals Map.

Para 22.4.1 : The reference to preventing '*encroachment towards sensitive land uses*' should be removed, firstly because Buffer Zones are drawn around minerals sites, not around sensitive development, and secondly because the reference should be to **sensitive development** (as stated later in the paragraph), not to '*sensitive land uses*'.

Mineral Background Paper

Section 4.3 of the Minerals Background Paper states that '*it is not possible at this stage to establish what the sub-regional shortfall is and how it can be met until relevant planning applications/candidate site submissions in Blaenau Gwent and Torfaen are determined*'. The shortfalls and resulting allocation requirements set out in RTS2 are indicated and it is disappointing that in the four and a half years since the publication of the RTS and the requirements to produce an SSRC, this has not been addressed by the respective authorities. Four years on from the approval of the RTS which introduced the requirement for SSRC, we find the statement in paragraph 4.3 unacceptable. We also note that the annual build rate for dwellings is above that used within the evidence base for the RTS, which may have a consequence on the projected need for minerals to be identified in the SSRC.

Section 4.4 of the background paper states: '*the potential does not exist at this stage to meet some or all of the carboniferous limestone apportionment allocations required for other LPAs within the former Gwent sub-region*'. We question why this has not been delivered in the Minerals Background Paper and the requirement to deliver the SSRC

Also, within the Minerals Background Paper we have been advised that the information regarding the approved next phases of development at Ifton quarry as referred to in sections 5.7, 5.8 and Table 2 are incorrect. We understand that there is also no limit on annual extraction at Ifton Quarry as stated in Table 2 and would suggest that the Local Planning Authority clarifies the position with Heidelberg Materials UK as soon as possible

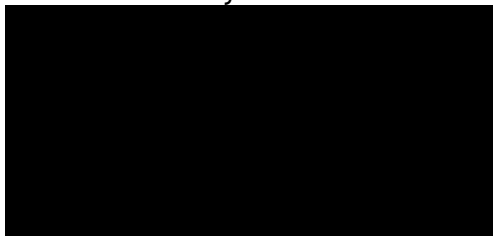
Further concerns extend to the "Latest Position" referenced in in the Minerals Background Paper and in particular Paragraphs 3.3 & 3.4. For a council or group of

councils to sit on the fence and wait for the decisions in neighbouring authorities goes against the ethos of “Forward Planning”.

We trust these matters will be addressed in advance of any local plan examination.

If you require clarification on any of the points made, please do not hesitate to contact us.

Yours faithfully

A large black rectangular redaction box covering the signature of the official.A black rectangular redaction box covering the contact information of the official.

1984

Raglan Village Action Group

View results

Respondent

495

Anonymous

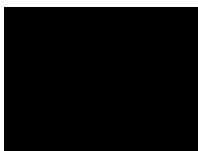
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Time to complete

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.

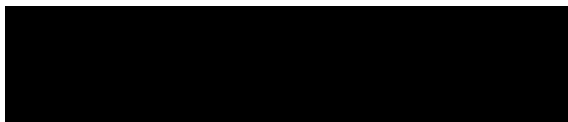
1. Title *



2. Name *



3. Job Title (where relevant)



4. Organisation (where relevant)

Raglan Village Action Group

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

10. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

11. 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.

*

Object to the excessive level of housing growth, and to the 15% flexibility allowance.

Object to Policy S1: The housing target of 5,400 – 6,210 homes over the Plan period 2018 – 2033 is excessive. It includes approximately 4,080 homes in the existing landbank, so new sites are allocated for approximately 1,320 – 2,130 new homes. The Welsh Government letter of 27 August 2021 to MCC stated that the proposed level of housing growth should “be no greater than 4,275 units ... plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.” Mark Hand, MCC’s Head of Placemaking etc. wrote to all MCC members on 22 September 2021 stating that the WG “letter’s prescribed maximum of 4,275 homes plus 10% flexibility ... result in a Plan with no new housing allocations.”

The fact that the housing figure in the Preferred Strategy, carried forward into the DRLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, does not alter the fact that WG’s 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales. Indeed, the later letter reiterated WG’s stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the DRLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

The objection to 5,400 – 6210 homes is that a target of 4,275 homes would remove the need for new housing allocations in Raglan and the other secondary settlements of Usk and Penperlleni and other settlements elsewhere. The allocated housing site south of Monmouth Road in Raglan is unnecessary, and its environmental and sustainability harm could be avoided.

Also in Policy S1, the 15% flexibility allowance is unjustified: Justification for the 15% flexibility allowance is provided in the Housing Background Paper October 2024 and includes the statement at para 3.3 that “it ensures the strategic sites ... are sufficiently large...” and will “...result in the Plan being able to provide a range and choice of sites...” etc. The probability is that over-allocation of sites will lead to cherry-picking by developers such that more sites will be developed than are justified by an already excessive housing target, that the most difficult to develop sites will be left to last, and that the most marketable sites, in villages such as Raglan, will be developed first, adding to pressure on Raglan.

Regarding soundness, there is also objection to the DRLDP’s preparation process; the Delivery Agreement which accompanied the consultation draft Preferred Strategy was agreed by the Council on 1 December 2022 and committed MCC to gain endorsement of the Preferred Strategy and its housing target before the DRLDP was prepared. This Delivery Agreement requirement was not complied with, as set down in Part 3 to this Representation Form.

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

13. Is your representation in support or objection? *

☐ Support

☒ Objection

14. 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.

*

Object to the level of growth for secondary settlements in Policy S2 resulting from the excessive housing target and flexibility allowance in Policy S1; object to the excessive 6.05 ha employment growth because 4.5ha is allocated to Raglan.

Object to Policy S2 regarding Raglan village: S2 is objected to regarding the village of Raglan because the figure of 350 new homes (already objected to as part of Policy S1) that is/are required to help meet the excessive 5,400 – 6,210 housing target, to be shared between Raglan, Usk and Penperlleni as the three Secondary Settlements, is only 'indicative'. The overall 350 figure is 'indicative', and the figure is not apportioned between the three settlements, as referred to in para 6.4.4 which states that "Where growth cannot be met in an individual settlement, development will be directed toward a same tier or higher tier settlement within the same Housing Market Area." Because Raglan, Penperlleni and Usk are all in the same tier and implausibly within the Chepstow Housing Market Area (for decades, Raglan has been in the Monmouth Housing Market Area), then if Usk and Penperlleni have difficulties in accommodating their allocated level of housing growth, all or much of it could be redirected to Raglan. This would be unsustainable, (see the Inspector's Hearing Decision of 2019 on the Raglan 111 proposal by Richborough Estates APP/E6840/V/18/3218503) and contrary to the DRLDP strategy of sustainable growth: the phrase in para 6.4.4 "towards a same tier" settlement is objected to and should be deleted.

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

15. 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)

16. 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)

17. 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)

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. 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)

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☒ Yes

☐ No

22. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Object to Site HA10, South of Monmouth Road, which is for 54 dwellings on 4.5 ha. The site is part of the larger proposal for 111 houses rejected following the Inspector's Hearing decision (APP/E6840/V/18/3218503 in 2019). The 4.5 ha site is easily extendable, and its allocation in the DRLDP runs the obvious risk of reinstating and extending an unsustainable and environmentally damaging housing site. MCC's benign assessment of the site is utterly rejected, as the site is high quality agricultural land which should be retained, formed part of the original Castle Estate, its development would be visually damaging to the setting of the Conservation Area, to views to and from the Castle, and walks around it are highly valued as a recreational asset. Increased traffic on the high street will be a problem, as will increased use of the A40 junction to the east of Raglan.

Object to the rejection of the Usk Road candidate site: Candidate site is rejected by MCC because MCC state: "While a southern section of the site is within a flood risk area, development could be directed away from this part of the site. However, the site is not allocated as there is sufficient suitable land available within Raglan to accommodate its housing need." This is an unjustified response. It evidences that no proper comparison has been undertaken with regard to the sustainability of the Usk Road site compared to the allocated site HA10 south of Monmouth Road. Ea1
Its accessibility from the A40 roundabout is an important asset.

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☒ Yes

☐ No

26. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Object to Policy EA1 – Employment Allocations: Site EA1j, Land west of Raglan, 4.5ha for use classes B1, B2 and B8 is objected to. The MCC assessment on page 206/207 notes the damage to high quality agricultural land and on the setting and landscape of the village, but concludes the site’s “allocation will provide much needed employment land in Raglan and the wider County reflecting Raglan’s location and its access to other settlements.” This is no justification at all, and suggests that MCC have longer term aspirations for the growth of Raglan village which would be utterly contrary to the Inspector’s decision on the 111 houses proposal mentioned above and rejected on sustainability grounds. Site EA1j, if developed, would result in visually prominent large sheds, and the run-off would exacerbate flooding risks for downstream residents. The site’s development would also set the precedent for northward extension towards the A40 and its roundabout. Bus connections to major population centres are poor such that the site’s village location will inevitably result in increased journeys by car.

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

28. 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)**

29. 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)

30. 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)

31. Would you like to comment on this question *

☒ Yes

☐ No

32. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Object to Policy C14 – Areas of Amenity Importance (AAI). The policy states “Areas of Amenity Importance are identified on the Proposals Map. Development proposals that lead to the loss of Areas of Amenity Importance will not be permitted.” The deletion of the AAI in Raglan north of Monmouth Road is objected to. It is deleted simply on the basis that the AAI Review (October 2024) states at its para 1.6: “Other spaces that are privately owned and not accessible to the public have also been excluded from AAI, this includes areas classified as garden curtilage and private grounds/paddocks. Some of these spaces were previously designated in the adopted Local Development Plan (2014) but it is not considered appropriate to roll these forward.” The AAI review provides no justification for the exclusion of privately owned areas that, in the case of the deleted Raglan AAI, was designated because of its openness, amenity value and importance to the Conservation Area and the views and links between the castle and its parkland south of Monmouth Road, an importance upheld by numerous Planning Inspectors. The AAI does not have recreational value, and has no need for public access. Indeed, the only justification given is that the Raglan AAI site is “Private, not accessible, therefore cannot be designated as AAI”. To hide such an important and unjustified policy decision in a background paper also calls into question the process for the DRLDP’s preparation and therefore its soundness. Here it should be noted that Planning Committee’s resolution to grant planning permission for 21 houses (DM/2023/01019) was justified by officers in their Report to the meeting on 3 December 2024 and was based on their concluding allegation that “Public open areas within the site mean that the important historic view of the castle will be retained and therefore there will be no adverse impact on land designated as an Area of Amenity Importance.” Although the presenting officer did comment to members that the AAI designation was deleted in the consultation DRLDP, the implication of the officer conclusion is that the AAI designation could remain despite the 21 houses, implausible as this may seem.

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

34. Would you like to comment on this question *

☒ Yes

☐ No

35. Is your representation in support or objection? *

☐ Support

☒ Objection

36. 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.

*

Object to Policy W3 which identifies W3a, 1.5 ha, Raglan Enterprise Park and W3b, 4.5 ha, Land West of Raglan, as both having potential for the location of in-building waste management facilities. Waste management will add to traffic impacts, and will erode the quality of the existing and proposed employment sites.

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☐ Support

☒ Objection

39. 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.

*

Object to the Areas of Amenity Importance Review (AAI): The deletion of the AAI in Raglan north of Monmouth Road is objected to. It is deleted simply on the basis that the AAI Review (October 2024) states at its para 1.6: "Other spaces that are privately owned and not accessible to the public have also been excluded from AAI, this includes areas classified as garden curtilage and private grounds/paddocks. Some of these spaces were previously designated in the adopted Local Development Plan (2014) but it is not considered appropriate to roll these forward." The AAI review provides no justification for the exclusion of privately owned areas that, in the case of the deleted Raglan AAI, was designated because of its openness, amenity value and importance to the Conservation Area and the views and links between the castle and its parkland south of Monmouth Road, an importance upheld by numerous Planning Inspectors. The AAI does not have recreational value, and has no need for public access. Indeed, the only justification given is that the Raglan AAI site is "Private, not accessible, therefore cannot be designated as AAI". To hide such an important and unjustified policy decision in a background question also calls into question the process for the DRLDP's preparation and therefore its soundness. Here it should be noted that Planning Committee's resolution to grant planning permission for 21 houses (DM/2023/01019) was justified by officers in their Report to the meeting on 3 December 2024 and was based on their concluding allegation that "Public open areas within the site mean that the important historic view of the castle will be retained and therefore there will be no adverse impact on land designated as an Area of Amenity Importance." Although the presenting officer did comment to members that the AAI designation was deleted in the consultation DRLDP, the implication of the officer conclusion is that the AAI designation could remain despite the 21 houses, implausible as this may seem.

Object to the Housing Background Paper: The section entitled Housing Potential Study and its Appendix 1 should not have included the Area of Amenity Importance north of Monmouth Road, Raglan.

Part 3: Tests of Soundness

Please refer to the notes at the for further

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

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

☐ Yes

☒ No

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

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

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

The DRLDP is not considered sound as it fails legal and regulatory procedural requirements.

MCC has contravened its Delivery Agreement/Community Involvement Scheme. The Council committed to a Delivery Agreement/Community Involvement Scheme that commendably but voluntarily embraced a scheme of public consultation summarised in the Officer Report of 1st December 2022 at its 3.28 that: "Statutory consultation/engagement will take place over an eight-week period in December 2022 - January 23 ... Following the stakeholder involvement, engagement and consultation on the Preferred Strategy, responses will be collated and carefully considered. A consultation report will be prepared and published containing details of the representations and the Council's response to them. A summary consultation report and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy." The Council has contravened its own Delivery Agreement/Community Involvement Scheme, and thereby contravened the 2005 (2015) Regulations and the Planning and Compulsory Purchase Act 2004 63 - (1). The Preferred Strategy housing target is the single most important element of the DRLDP and Members were denied the chance to consider it in the light of representations received before the Deposit Version was prepared.

The DRLDP is not considered sound because it fails Test 1 in that its excessive level of housing growth is not in general conformity with the South East Wales regional housing apportionment in Future Wales: the National Plan 2040. The DRLDP unsustainably directs too much development away from the National Growth Area which is Cardiff, Newport and the Valleys. The Welsh Government letter to MCC of 27 August 2021 required a level of housing growth no greater than 4,275 units plus an appropriate flexibility allowance: "This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales."

The fact that the housing figure in the Preferred Strategy, carried forward into the DRLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 January 2023, does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales. Indeed, the later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the DRLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

Part 4: Appearance at Examination Hearing Sessions

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

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

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

☒ Yes

☐ No

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

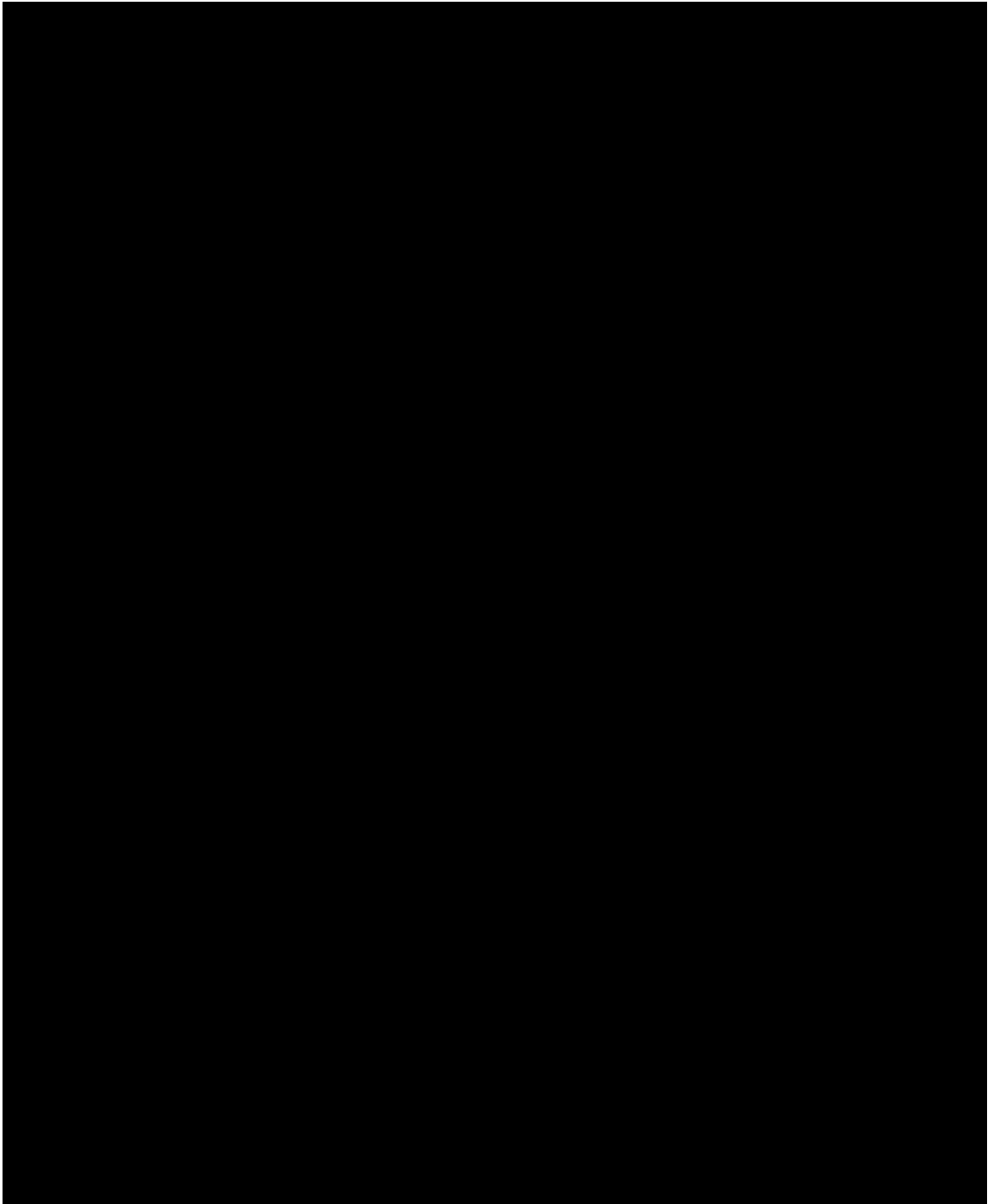
☐ Welsh

☒ English

Part 5: Welsh Language

45. 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?

46. 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?



2399

**South East Wales Regionally Important
Geodiversity Sites Group (SEWRIGS)**

[View results](#)

Respondent

135

Anonymous

22:05

Time to complete

Part 1: Contact Details

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

1. Title *

2. Name *

3. Job Title (where relevant)

4. Organisation (where relevant)

South East Wales Regionally Important Geodiversity Sites group (SEWRIGS)

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

11. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy HA15 Land East of little Mill is proposed on a SEWRIGS.- Usk Glacier terminal moraine marking the southern margin of the maximum ice advance in the last ice age.

Regionally Important Geodiversity Sites (RIGS) are non-statutory sites selected to protect the most important places for geology, geomorphology and soils, complementing the network of legally protected Sites of Special Scientific Interest (SSSIs). RIGS are selected for their scientific, educational, historical and aesthetic features. As stated in Planning Policy Wales, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.

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

13. Would you like to comment on this question *

☐ Yes

☒ No

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

16. Would you like to comment on this question *

☐ Yes

☒ No

Do you have any comments on the infrastructure 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

20. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Policy HA15 Land East of little Mill- Usk Glacier Terminal Moraine-is proposed on a SEWRIGS.- Usk Glacier terminal moraine marking the southern margin of the maximum ice advance in the last ice age.Important Geodiversity Sites (RIGS) are non-statutory sites selected to protect the most important places for geology, geomorphology and soils, complementing the network of legally protected Sites of Special Scientific Interest (SSSIs). RIGS are selected for their scientific, educational, historical and aesthetic features. As stated in Planning Policy Wales, Planning Authorities should protect the features and qualities for which RIGS have been designated. The impact of proposed developments will depend on the nature of the RIGS feature, so early consultation with the local RIGS group or NRW is strongly recommended.

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. 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)

27. 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)

28. 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?

29. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

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

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

☐ Yes

☒ No

31. 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)?

32. 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): *

Sorry I don't know why you need this.

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.

33. 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

34. 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?

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

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[View results](#)

Respondent

193

Anonymous

34:59

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)

South East Wales Regionally Important Geodiversity Sites Group

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 placemaking 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

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

15. 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)

16. Would you like to comment on this question *

☐ Yes

☒ No

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

17. Would you like to comment on this question *

☒ Yes

☐ No

18. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

HA13 land next to Piercefield Public House St Arvans.

This is a RIGS. It is part of the catchment of groundwater for the underlying Otterhole cave system.

From Welsh Planning Policy : Regionally Important Geodiversity Sites (RIGS) are non-statutory site designations that recognise locally or regionally important geological and geomorphological landscape features. RIGS are selected for their educational, scientific, historic and aesthetic qualities, to and designated through development plans.

6.3.16 Planning authorities should protect the features and qualities for which Geoparks and RIGS have been designated, and are encouraged to promote opportunities for the incorporation of geological features within the design of development, particularly where relevant evidence is provided by Green Infrastructure Assessments.

Please contact NRW/SEWRIGS for more information.

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?

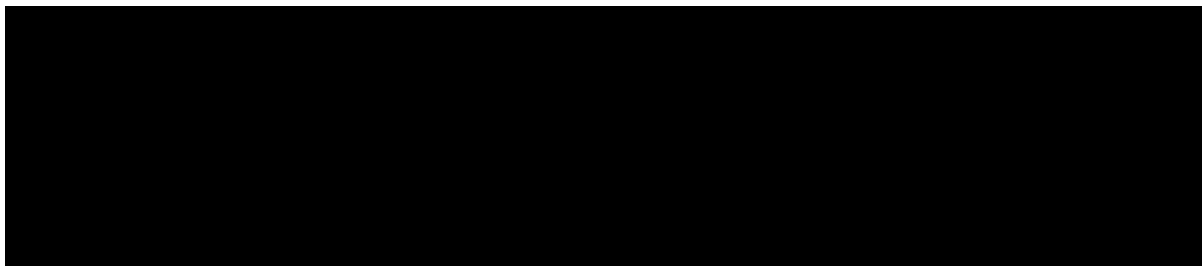
☐ Yes

☒ 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?



2532

Cwmpas Community Housing

Monmouthshire County Council Replacement Local Development Plan (2018-2033) Preferred Strategy Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **5th December 2022 to 30th January 2023**. All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. 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.

PART 1: Contact details

Your/ your Client's details		Agent's details* (if relevant)
Title:	[REDACTED]	
Name:	[REDACTED]	
Job title: (where relevant)	[REDACTED] [REDACTED]	
Organisation: (where relevant)	Cwmpas	
Address:	[REDACTED]	
Telephone no:	[REDACTED]	
Email: (if you have one)	[REDACTED]	

*Note if agent's details are included, all correspondence will be sent to the agent.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: <http://www.monmouthshire.gov.uk/planning-policy/current-consultations>

Office Use Only

Representor Number
Submission Type (email/web/letter etc)

PART 2: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help us to understand the issues you raise.

Key Issues, Vision and Objectives (Paras 3.1 - 4.3 / Pages 10- 24)

Do you have any comments on the key Issues, Vision and Objectives?

Our comments and observations are made in the context of the overall document issued for consultation and are noted thus:

By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.

Having reviewed the Preferred Strategy consultation document, Cwmpas sees a clear synergy between the key issues, challenges and vision statements within the Preferred Strategy of the emerging Monmouthshire Replacement Local Development Plan and community led housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 – 2026'.

For a scheme to be 'community led', the community must be integrally involved throughout the process of the development in terms of identifying the need and maintaining a strong involvement in delivering housing to meet that need even though in some cases the community does not necessarily have to initiate and manage the development process itself or build the homes themselves. Indeed, there are many ways for people to be involved in meeting their own housing needs. Community groups may respond to housing needs in their local area and seek to deliver their own homes. Local authorities, landowners, Registered Social Landlords (RSLs) or small builders may seek to provide housing that benefits the local area in perpetuity, and work with the community to enable this to happen. However, all such community led housing schemes are characterised by providing housing for the local community that is affordable and available in perpetuity and by providing far greater certainty to local communities as to who the housing will be occupied by and potentially offers new opportunities and benefits for sustainable local economic, social and environmental development.

Finally, it is important to recognise that community led housing is not a case of 'one size fits all' as it can come about for a number of reasons and take a number of different forms. For example, co-housing is a design methodology used by intentional communities to create spaces that promote connectivity and togetherness; housing co-operatives are housing

organisations controlled, managed and owned by its members; and Community Land Trusts (CLTs) are legal entities set up by communities to provide and protect assets of community value such as genuinely affordable housing. As such, no two projects are the same. Community led housing can be adapted and moulded to create bespoke solutions that address particular issues and factors, whether socially or spatially, that have led to a group forming.

In summary, community led schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes and in a manner of their choosing; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity.

More specifically, community led housing directly addresses the issues and challenges within Monmouthshire as identified in the Preferred Strategy in terms of:

- Rebalancing demography through the creation of affordable community led housing that will create opportunities to retain and attract young people and thereby foster social and economic sustainability of the communities of Monmouthshire;
- Addressing inequality by increasing the amount, quality and choice of affordable housing options within the County;
- Addressing the climate emergency with net zero housing developments that are inherently sustainable in terms of build standards and technology, founded upon placemaking principles, reduce dependence of private modes of transport in favour of active travel and which provide green spaces and local food production opportunities;
- Addressing the nature emergency where preservation and enhancement of the biodiversity qualities of a site is a key component.

It is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of 'home' and 'place' become more important than ever. Cwmpas believes that these elements are essential to fostering community cohesion, resilience, safety and connection, and creating places and environments where the health and well-being of individuals, residents, business and communities can thrive and flourish and reach their full potential based on community led affordable housing delivery at its heart. As such, community led housing will be fundamental both to the qualitative nature of new affordable housing in the County and to the quantitative targets of delivering upon the target of between 1,580 and 1,850 new affordable homes in Monmouthshire as identified for the RDLP period 2018 – 2033.

There is specific 'fit' and integration, therefore, of community led housing with the Strategic Policies identified in the Preferred Strategy in relation to 'Strategic and Spatial Choices' and 'Active and Social Places', most especially Policy S6 Affordable Homes and Policy S7 Strategic Site Allocations (Abergavenny East, Bayfield Chepstow and Caldicot East). Similarly, as well as further indirect impacts and outcomes on all seven of the WBFG Act goals, there is a direct

correlation with those concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales.

Therefore, to develop the consideration that the Preferred Strategy makes in terms of the variety of housing types and tenures that are capable of being developed on a site, Cwmpas believes that an explicit statement in the document around the role and opportunity presented by community led affordable housing would be beneficial, a positive addition to the Strategy and emerging RLDP and importantly, it would be in with the spirit and policy context of PPW 11. Indeed, Cwmpas would respectfully request and positively welcome an overt reference to community led housing as part of the affordable housing 'offer' rather than simply say in the context of self-build plots or other traditional forms of affordable housing delivery through SHG-funded development by RSLs or Section 106 Agreements.

In making these comments and suggestions to include explicit reference to community led housing in the Preferred Strategy, as a signatory to the to the Design Commission for Wales Charter under its previous name as the Wales Co-operative Centre, and with reference to the Placemaking Guide 2020, Cwmpas believes that there is direct integration and correlation with the essence of community led housing and national planning policy as contained within PPW Sustainable Placemaking Outcomes in terms of social, environmental, economic and cultural well-being thus:

- Creating and Sustaining Communities – community led housing promotes health and well-being and globally responsible Wales principles in the WBFGA legislation and makes a very direct and clear link between housing development in a community and meeting the housing needs of that community whilst allowing that community genuine input into the development process. Furthermore, the functionality of community led housing for example in terms of the sense of community, shared spaces and facilities, and social interactions is demonstrative of the essence of creating cohesive communities;
- Facilitating Accessible and Healthy Environments – for example, a key design principle of community led housing is to reduce dependence on private modes of transport and to encourage active modes of travel within the sustainable transport hierarchy. Furthermore, community led housing is a community facility or asset as it is the delivery of affordable housing by the community and for the community;
- Maximising Environmental Protection and Limiting Environmental Impact – community led housing addresses sustainability in its broadest sense of social, environmental, economic and cultural sustainability by creating viable and sustainable places through for example shared facilities and spaces such as growing areas, communal laundry or co-working hubs
- Making Best Use of Resources – community led housing will often look to develop on brownfield sites or through repurposing existing buildings or on underused land where perhaps it is not viable for a private developer or RSL to develop new affordable housing. A good case study example here is Bunker Housing in Brighton (<https://bhclt.org.uk/bunker-housing-co-op-starts-building/>) and in this context Cwmpas would welcome opportunities to engage with community groups on sites that might be considered too small, go unnoticed or present technical challenges to bring such sites forward for community led affordable housing;

- Growing Our Economy – community led housing contributes and responds positively to new patterns of work in developing places and environments for communal working or more sustainable spaces that balance work and living

Furthermore, it is considered that a direct reference to community led housing in the Preferred Strategy document will address and removes some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing will bridge the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognises the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

Finally, a direct reference will establish the context for subsequent planning policy development in the emerging RLDP in terms of: site specific community led housing allocations or provision of such housing as a proportion (say 5 -10%) of the dwellings on larger strategic site; rural exceptions policies; and in the repurposing or more efficient and effective re-use of community building and land. In addition, there are proven examples across the United Kingdom of land assets and the disposal thereof being ring-fenced for development as community led housing with a leading case example being Bristol City Council - <https://news.bristol.gov.uk/press-releases/7bfd6b25-f975-40b2-9468-5471a909da7a/groups-chosen-to-develop-community-led-housing-sites> .

Preferred Strategy (Paras 4.4- 4.8 / Pages 25-27)

Do you have any comments on the Preferred Strategy?

Please refer to above

Strategic Policies S1 – Growth Strategy (Paras 4.9- 4.26 / Pages 27-32)

Do you have any comments on Strategic Policy S1 – Growth Strategy

Please refer to above

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.27 - 4.35 / Pages 33 - 40)

Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?

Please refer to above

**Strategic Policy S7 – Preferred Strategic Site Allocations
(Please State which Preferred Strategic Site Allocation you are commenting on)
(Paras 5.32 - 5.36 / Pages 56- 59)**

Do you have any comments on the Preferred Strategic Site Allocations?

Please refer to above

**Other Strategic Policies (Please State which Strategic Policy you are commenting on)
(Paras 5.1-5.123 / Pages 41-98)**

Do you have any comments on the Strategic policies?

Please refer to above

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on) (Appendix 7 Pages 136-147)

Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

Please refer to above

Any other Comments

Do you have any other comments on the Preferred Strategy?

None

Welsh Language

We would like to know your views on the effects that the proposals would have on 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?

Cwmpas delivers the Communities Creating Homes project, Wales' only community-led housing hub, which offers support and advice to new and existing organisations looking to develop co-operative and community-led housing schemes in Wales.

We believe co-operative and community-led housing has the potential to make a real difference as part of the solution to the housing crisis in Wales. We were happy to see that a commitment to increasing this model of housing was part of the new Programme for Government, and believe that assessing how the co-operative model, and community involvement in housing as a whole, can be expanded further in Wales should be a priority.

Dr Simon Brooks' recent paper clearly outlines the extent of the impact of second homes in Welsh language communities. We believe that this issue is a symptom of the imbalance of the housing market, and the lack of control people living in places across Wales have over the future of their communities. This necessitates policy intervention, and we welcome the opportunity to contribute our perspectives following our experience of working with community-led housing projects, social enterprises and co-operatives in Wales.

We believe that community-led and co-operative models of housing can play a crucial role in rebalancing the housing market so power rests with communities and community cohesion, resilience and well-being is prioritised at least to the same extent as profit and economic value. Community-led models support the housing needs of a local community, ensuring that there is sufficient affordable housing available, which in-turn protects the survival of the Welsh language.

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

Please see above

Initial Integrated Sustainability Appraisal (separate document)
<i>Do you have any comments on the Initial Integrated Sustainability Appraisal Report?</i>
None
Habitats Regulations Assessment (separate document)
<i>Do you have any comments on the Habitats Regulations Assessment?</i>
None

To assist with the efficient processing of responses we would encourage you to submit your comments via email to: planningpolicy@monmouthshire.gov.uk. If this is not possible completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 30th January 2023**.

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.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. ✓

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. ✓

Comments of Cwmpas (Consultee)

Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033

Deposit Plan Consultation

Our comments and observations are made in the context of the overall document issued for consultation and are noted thus:

By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.

Having reviewed the Deposit Plan consultation document, Cwmpas sees a clear synergy between the key objectives and vision statements within the Deposit Plan of the emerging Monmouthshire Replacement Local Development Plan and community led affordable housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 – 2026'.

In reviewing the Deposit Plan, Cwmpas believes that community led affordable housing had direct relevance and contribution to the following policies within the Deposit Plan and for which it is believed that a direct and overt reference to community led housing could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Monmouthshire:

- Strategic Policy S7 Affordable Housing
- Housing Policies H1, H2, H3, H4 and H8
- Housing Policy H9 Affordable Housing Exceptions Site
- Objectives 9, 10, 11, 12 and 13

Similarly, community led affordable housing has indirect contributions to the following policies and objectives:

- Strategic Policy S1 Growth Strategy – Sustainable and Resilient Communities (especially in Delivery of Affordable Housing)
- Strategic Policy S2 Spatial Distribution of Development and Settlement Hierarchy
- Strategic Policy S3 Sustainable Placemaking and High-Quality Design

- Policy PM1
- Strategic Policy S15 Community and Recreation Facilities especially Policy CI2
- Objectives 6 Land and 8 Health and Wellbeing

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document would address and remove some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing will bridge the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognise the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

Recognition of community led affordable housing within the Deposit Plan would reflect the changes made in February 2024 and introduced into PPW (Edition 12) and within that the recognition of the role of community led housing including:

Paragraph 4.2.14 PPW now stating:

'As part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs), community-led housing organisations and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.'

Similarly, Paragraph 4.2.15 PPW states:

'To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs, community-led housing organisations and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan. Planning authorities should also work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.'

Finally, and most significant to our consultation response, Paragraph 4.2.27 of PPW now states:

'Affordable housing includes social rented housing owned by local authorities and RSLs and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents. Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government's definition set out in

paragraph 4.2.26 above. All other types of housing are referred to as 'market housing,' that is private housing for sale or rent where the price is set in the open market and occupation is not subject to control by the local authority. It is recognised that some schemes may provide for staircasing to full ownership and where this is the case there must be secure arrangements in place to ensure the recycling of capital receipts to provide replacement affordable housing.'

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Monmouthshire Deposit Plan would benefit.

With Planning Policy Wales ("PPW") being the principal national planning policy document which sets out the land use policies of the Welsh Government against which development proposals should be assessed, the latest version published in February 2024 seeks to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW with local planning policy required to seek to deliver development that adheres to these principles. In a bid to ensure placemaking is prioritised, and to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely 'Strategic and Spatial Choices,' 'Active and Social Places,' 'Productive and Enterprising Places,' and 'Distinctive and Natural Places.' Community led affordable housing development makes positive and significant contributions to each of these themes.

Additionally, PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals with PPW stating emphatically that 'legislation secures a presumption in favour of sustainable development.' Moreover, PPW covers the Key Planning Principles of WG in seeking to achieve 'the right development in the right place.' Development proposals must seek to deliver development that addresses these outcomes. Another Key Planning Principle of WG is facilitating accessible and healthy environments, stating that 'Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health.' Similarly, creating, and sustaining communities is a further Key Planning Principle, stating: 'The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure, and facilities so that people feel content with their everyday lives.'

In summary, wellbeing goals of the Well-being of Future Generations Act (WFGA) are clearly adhered to in community led affordable housing. PPW 12 brings the objectives of the Act into clearer focus in a planning context, and within which community led affordable housing delivery is specifically recognised. Hence, by introducing community led affordable housing

into the Deposit RLDP, there exists compliance with PPW which thereby demonstrates adherence to the WFGA.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP should make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, Deposit RLDP policies on community led housing development could include a definition which might read:

A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed, and democratically controlled by its members. It may take any one of various legal forms including community land trusts, housing co-operatives, co-housing, mutual housing, tenant-controlled housing. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage, or steward the homes in a manner consistent with its purpose with benefits of the development to the specified community should being clearly defined and consideration given to how these benefits can be protected over time, or in perpetuity. Community led housing schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity.

Secondly, it is evident that supporting the delivery of self-build or custom housebuilding and community-led housing can contribute to greater housing choice and potentially provide lower cost and affordable options for households than regular market housing. The importance of PPW Edition 12 is key to the evolution of specific community led housing policies within the RLDP preparation process at Deposit Plan stage. This could be addressed in policy drafting to include:

- Site specific allocations for community led affordable housing;
- Provision for community led housing as part of wider new development say 5 -10% of the dwellings on larger strategic growth or regeneration sites;
- Community led housing exceptions sites as in repurposing or more efficient and effective re-use of redundant community buildings and land, or, reuse of underused or vacant employment or industrial land, or, reserved open space provided the proposal is demonstrably supported by the local community and no deficiency of open space will arise as a consequence.

However, it is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of 'home' and 'place' become more important than ever. Cwmpas believes that these elements are essential to fostering community cohesion, resilience, safety, and connection, and creating places and environments where the health and well-being of individuals,

residents, business, and communities can thrive, flourish, and reach their full potential based on community led affordable housing delivery at its heart. As such, community led housing will be fundamental both to the qualitative nature of new affordable housing in the County and to the quantitative targets of delivering upon the new affordable homes targets for the emerging RDLP. Moreover, as well as further indirect impacts and outcomes on all seven of the WBFG Act goals, there is a direct correlation of community led housing with those goals concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document would represent a very positive addition and that it would address and remove some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage.

2542

Devauden Community Council

View results

Respondent

628

Anonymous

10:21

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

11. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RLDP consultation - Devauden Ref: CS0214 Land at Churchfields Residential - 20 houses

Our substantive objections are the same as those raised in opposition to the development of 12 houses at Well Lane/Cwm Fagor lane:

Treatment of waste:

The current waste treatment plant at Devauden is at or beyond maximum capacity. The solution at the time of the approval of the Well Lane site was to provide additional sewage tankers to export excess waste. We do not consider this an adequate long term solution, and there are current safety problems with this arrangement.

Active transport options to the amenities of the village:

The Well Lane development was built with insufficient consideration of walking and cycling access to the amenities in Devauden, including the Hood Memorial Hall and the childrens' playground. The safest way to travel the 150 or so metres to the hall was and remains to drive children there.

Pressure on local healthcare, social care and schools:

All of these essential services are very stretched. Wait times for surgery appointments are extended.

Expensive, poor provision of public transport:

There is a constant battle to save these essential services, which are infrequent and expensive.

Pressure on mobile phone services:

Recent storms have demonstrated the lack of resilience of mobile phone services faced with extended powercuts. Given that copper phone networks are being phased out by 2025, the mobile service needs to be considered as critical infrastructure and its resilience improved by the appropriate MNOs.

Employment & Services

Any additional employment would be out of area, increasing road traffic as current public transport infrastructure is inadequate. There are no main food shops in the area requiring additional transport for either deliveries or journeys out of the village.

The council seek reassurances that these issues will be properly considered and adequately addressed before this planning process moves forward. That should include assurances and/or representation from Dwr Cymru / Welsh Water, Natural Resources Wales, EE, Wye Valley Surgery, Shirenewton and Chepstow schools, and all providers of public and school transport.

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

18. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. 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)

27. 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)

28. 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?

29. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

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

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

☐ Yes

☒ No

31. 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)?

32. 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): *

Does not fit the plan

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.

33. 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

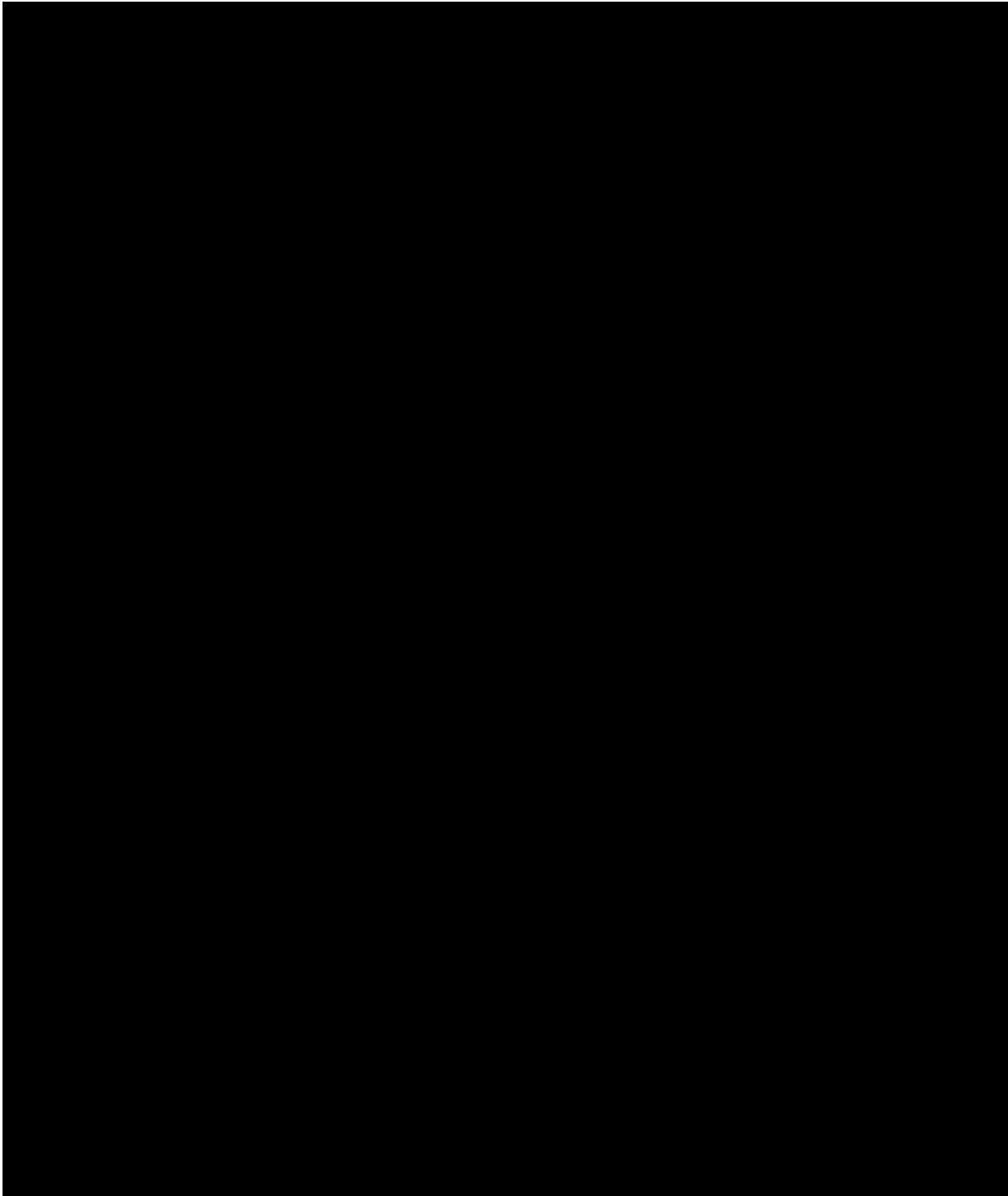
Part 5: Welsh Language

34. 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?

Speaking welsh is not the priority here and seems irrelevant.

35. 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?

That does not seem a necessary aim, People will speak and use welsh language if they choose to, it should'nt be forced, imposed or pressured. Welsh language should be personal choice, not a government strategy to enforce it.



2548

Shirenewton Community Council

Archived: 14 March 2025 15:40:39

From: [REDACTED]

Sent: Wed, 11 Dec 2024 12:53:01

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: MCC new Local Development Plan Consultation 2024

Importance: Normal

Sensitivity: None

Dear Sirs,

This is in response to question 10 re Policy HA18 Land west of Redd Landes Shirenewton CS0232 and is to be included in the public replies to MCC's consultation on the proposed RLDP 2018-33.

SCC objects to the inclusion of this as a candidate site for the following reasons:

1. It lies outside the current defined village envelope. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. This site is part of that green belt and should remain for farming/agricultural use, and be excluded from the proposal to extend the current village development boundaries.
2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages . This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.
3. Heritage and Landscape. The RDLP candidate site submission asserts overall :
that the site performs well against the site search sequence. While the site is partly Best and Most Versatile (BMV) agricultural land, the RDLP asserts it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land, benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, is within walking distance of the primary school and meets key policy requirements, including 50% affordable housing and net zero carbon homes.

The assessment considers neither our heritage nor landscape. The core of Shirenewton is a conservation area and the proposed site is in view from it. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements.

A previously proposed candidate site which also lies to the west of the village but on the opposite side of the road is not progressing as significant concerns were raised in relation to heritage impact. Those should equally apply to this candidate site.

4. Recreation Ground limitations. We have a small recreation ground that does not provide all the facilities our

villagers desire – the cricket square competes for space with the footballers, there is no hard path, nor are there any dedicated outdoor activities for our teenagers other than a single tennis court (which is not free to use). At least half of the candidate site, which was originally 10.5 acres could more usefully be dedicated to the village for use as open space and those activities we sorely lack. In addition, the new homes families will have to cross the main exit route from the village to reach the recreation ground and a pedestrian crossing would be vital. The indicative contribution from the site developer towards recreational facilities is proposed at £26k based on current indicative cost. Our own costings show this would be significantly short in covering the cost of a hardpath and other facilities that we lack.

5. There is inadequate and unresolved infrastructure to support new development sites such as this and there is no realistic prospect that such services can be procured within the RDLP lifespan.

- 5.1. The Infrastructure Delivery Plan states *there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW* but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter. Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

- 5.2. We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

- 5.3. The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed limit for much of its length.

- 5.4. We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

- 5.5. Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services

there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.

- 5.6. We have almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Only FTTC is available which limits broadband speed, and speeds in excess of 100mb/s inside houses are not available in the village. The service is overhead and prone to fluctuation in adverse weather. We are not aware of any BT plans to bring us superfast broadband within the time frame of the RDLP, which reduces the appeal of WFH and encourages continuing use of the roads.
- 5.7. Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.
- 5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles. Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.
- 5.9. The Chepstow Beech Hill roundabout which is our link to the motorway network is already over congested and known for its poor air quality. Proposals for a Chepstow bypass for the A48 will not materialise until after 2033. The Land at Mounton Road Chepstow off the Beech Hill roundabout will add 146 houses with inevitable consequences to pollution and congestion.
- 5.10 The RDLP summary speaks of affordable housing within exemplar mixed sustainable and well-connected places. There is no policy provision how planning officers are to determine the “mix”. In the absence of a policy, officers will be at risk of pressure from developers whose profit lies in building large houses. The plans for the existing new build site for 11 houses show a vast gulf between the outside and inside dimensions of the affordable houses in comparison to the executive style market houses. The draft RLDP appears to contemplate there will be a mix of affordable housing but in addition we consider 2 and 3 bedrooomed market houses would provide a step onto the property ladder for our youngsters in order to retain them in our villages, and provision should be made for sheltered housing and bungalows for our disabled and elderly who wish to remain locally. There are many executive type houses in the village, and we have no need of any more. The RDLP should empower MCC to determine and impose the exemplar housing mix to suit our village, taking account of our villagers' needs and concerns. Minimum plot sizes should also apply so as to avoid creating the back to back Victorian terraces of old. The term “exemplar” should be defined by policies setting minimum standards (such as the old Parker Morris requirements) for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars, including visitors and forecourt charging for electric vehicles, and van deliveries and for a lower building density which does not degrade new developments into the back to back the Victorian terraces of old.
- Policies should provide that affordable housing development cannot proceed without a housing association and its funding being in place. Without this in place the sale and occupation of the affordable housing is at risk as will be the bankruptcy of the developer.
- 5.11 Policies should require market housing to be subject to the same conditions for occupation as affordable housing, so that it is reserved for families with connection to Shirenewton and Earlswood wards, such connection to be defined by length of residence or employment in our wards and/or generational family association.

In summary our objections are:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards.
8. In other words, the development is undeliverable in its scale, and phasing does not provide a solution.

Clerk Shirenewton Community Council



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View results

Respondent

577

Anonymous

19:24

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

10. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

11. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

The final plan relies on population projections which may not transform into reality. The latest birth rate statistics show a decline in the birth rate. This and external factors such as climate change, changing work practices and morbidity rates suggest the final plan is unlikely to deliver on its expectations, and should lean towards low growth and be capable of rapid review and adjustment

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

13. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

14. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

This lacks policy protection of Monmouthshire villages. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. The proposed inclusion of multi-plot development sites on the edges of villages located in proximity to the M4/M48 motorways runs counter to this policy. Policies should define and protect village envelopes and allow only minor infill within the envelopes. The number of houses should be limited in proportion to the number of existing village households to sustain the community cohesion and the density of the new housing should be no greater than the average within the village so as to maintain the village landscape.

Policies should protect farmland as agricultural land where grey field sites can be identified.

The final plan assumes that the desired number and mix of houses will be built by the private sector. That sector, like all business's, exists by sustaining a level of profit that ensures its survival. Profit lies in building large houses where costs, including contributions to infrastructure, can more readily be recouped. Maintaining a shortfall of new housing creating market house price growth is in the interests of housebuilders, and this trumps any societal intention to provide housing for those who need it.

Whilst the final plan presents a laudable effort to set targets, it will not deliver on them. The historic and ongoing failure of national and local government to build council housing, and the infrastructure to support both it and market housebuilding, dictates that the need for housing will continue to rise, irrespective of future variations in the population.

It is for the UK and Welsh Governments to set the priorities. Housebuilding by local authorities could be reinstated and funded by smaller, more efficient governments and the redirection of capital gains tax on development land sales.

The final plan recognises the conundrum that our work force continues to haemorrhage skilled workers to employers outside Monmouthshire because of the lack of relevant employment opportunities locally, and the lack of those locally available skills coupled with inadequate transport and telecommunication infrastructure deters new employers. It offers no solution, rather it makes the situation worse by supporting the proposed large scale developments at Caldicott, Portskewett and Chepstow. Worse still, it fails to protect the green belt north of the M4 despite Welsh Government planning policy.

If the final plan is to make a difference, it should call a halt to housing developments unless and until there is infrastructure to support it. That includes additional access onto the M4 and M48, bringing the Cardiff Metro to Chepstow, electricity and sewerage system rebuilding, and having gigabit broadband plus 5g phone for all.

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

15. Would you like to comment on this question *

☒ Yes

☐ No

16. Is your representation in support or objection? *

☐ Support

☒ Objection

17. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

The Welsh Government seeks to avoid ribbon development along the M4/M48 corridor but the proposed development site at Caldicot and Portskewett run counter to this policy.

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

18. Would you like to comment on this question *

☒ Yes

☐ No

19. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

20. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18
HA18 flies in the face of s3 as it fails to recognize the overwhelming impact of 26 houses on the Shirenewton village community, it does not address the lack of infrastructure to support it, it will increase traffic not reduce it, and it omits any reference to in site green space. It also fails to meet policy PM2 since the proposed development will result in an unacceptable risk of harm to the residents of Mathern from ongoing and unresolved escape of mains sewerage derived from Shirenewton. Non mains sewerage is unacceptable owing to the risk to the Shirenewton ground water protection zone.

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

21. Would you like to comment on this question *

- ☐ Yes
- ☒ No

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)

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☒ Yes

☐ No

24. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

Policy IN1 states that planning agreements and obligations will be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make development acceptable. In identifying appropriate contributions, due regard will be paid to the overall development viability, including the cost of measures that are necessary to physically deliver a development and ensure that it is acceptable in planning terms.

The Policies should acknowledge that the residents of rural villages and their environs are dependent upon cars and van deliveries and will remain so for the life of the RLDP and beyond, and this should be incorporated in the design of residential plot layouts so that there is adequate hard parking and turning, allowing for electric cars to be charged on those plots, for van deliveries to arrive and depart, and for unimpeded access by emergency vehicles.

The policies fails to address the situation in Shirenewton (and very likely in other small communities) where the cost of providing mains sewerage, electricity supply and telecommunications (both mobile and broadband) to the village will be very significant but will benefit the whole community old and new. The developer of HA18 cannot be expected to shoulder the entire cost as the whole community both new and old would benefit but there is no means of compelling existing households to contribute and therefore the upgrading works run the risk of not being completed in the time frame of this RDLP or at all. That outcome flies in the face of IN1. From the community's point of view, no development should proceed until the supporting infrastructure is fully funded and built.

Policy s6 contemplates the use of estate management companies to maintain the infrastructure of new housing sites. This overlooks that such companies in the private domain are unregulated, all too often overcharge, and provide inadequate upkeep. S6 should provide that MCC will be the manager of last resort. Policy IN1 should provide that a presumption that all digital infrastructure should be laid underground.

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

26. Would you like to comment on this question *

☒ Yes

☐ No

27. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

Objection in regard to HA18 – see separate submission.

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

29. Would you like to comment on this question *

- ☐ Yes
- ☒ No

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

30. Would you like to comment on this question *

- ☐ Yes
- ☒ No

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

31. Would you like to comment on this question *

☐ Yes

☒ No

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

32. 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)**

33. Would you like to comment on this question *

☒ Yes

☐ No

34. Is your representation in support or objection? *

☐ Support

☒ Objection

35. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

Policy ST1 states that 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.

Whilst the policy is founded on the hope that more residents will work from home, those same residents will wish to shop and take leisure activities by car. The proposed site HA3 (Moun-ton Road Chepstow) will add the vehicles serving 146 houses to vehicles already using the Beech Hill roundabout and which are brought to a standstill at every rush hour. The air pollution is already in excess of national limits and yet there are no proposals to improve the junction for example by creating new accesses onto the M48 and M4.

The policies in this part of the final plan need to reflect reality and insist on adequate road provision before considering any development.

Furthermore, these Policies should acknowledge that the residents of new urban development and especially rural villages and their environs are dependent upon cars and van deliveries and will remain so for the life of the RLDP and beyond, and this should be incorporated in the design of residential plot layouts so that there is adequate hard parking and turning, allowing for electric cars to be charged on those plots, for van deliveries to arrive and depart, and for unimpeded access by emergency vehicles.

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

36. Would you like to comment on this question *

☐ Yes

☒ No

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

37. Would you like to comment on this question *

☐ Yes

☒ No

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

38. Would you like to comment on this question *

☐ Yes

☒ No

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

39. Would you like to comment on this question *

☒ Yes

☐ No

40. Is your representation in support or objection? *

☐ Support

☒ Objection

41. 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.

*

Ref site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

1. Infrastructure is sorely lacking outside the main settlements. Most villages have no mains gas, electricity supplies are constricted and unable to meet rising demand for electric car charging, there is no priority for superfast broadband provision to tier 3 and 4 settlements and sewerage services through Mathern remain unfit for existing housing. Few of these settlements have a shop, school or surgery nor a bus service operating evenings and Sundays and bank holidays. The RLDP does not adequately address the need to make planning consent conditional on such infrastructure being fully upgraded prior to any development taking place. The risk is that initial plots on new developments will not be able to function as expected, raising the prospect of uncompleted sites and bankrupt developers unable to sell their newbuilds.

2. Laying the cost of upgrading the services onto developers only serves to increase the market price of the newbuilds. Where improved utility infrastructure benefits existing communities the associated costs should be expected to be met from the Welsh Government.

3. Exemplar housing and the housing mix are not defined terms. Policies should provide a procedure to establish set proportions of 2 & 3 bedroom market houses, bungalows and sheltered housing (offering a suitable choice of accommodation for disabled and elderly) taking account of local opinion. Exemplar housing should establish standards for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars and van deliveries and building density which does not degrade new developments into the back to back the Victorian terraces of old.

4. Policies should provide that affordable housing development cannot proceed without a housing association or equivalent and its funding being in place.

Part 3: Tests of Soundness

Please refer to the notes at the for further

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

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

☐ Yes

☒ No

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

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

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

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

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

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

As previously answered.

Part 4: Appearance at Examination Hearing Sessions

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

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

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

☐ Yes

☒ No

Part 5: Welsh Language

46. 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?

none

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

none.

About you

[View results](#)

Respondent

351

Anonymous

34:45

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 RLDLP?

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.

*

Shirenewton Community Council's response to MCC's proposed RDLDP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

SCC objects to the inclusion of this as a candidate site for the following reasons:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards.
8. In other words, the development is undeliverable in its scale, and phasing does not provide a solution.

Our objections are set out in full in our email to accompany this form as this response box does not expand sufficiently.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages. This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

.RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

Heritage and Landscape. The RDLP candidate site submission asserts overall :

that the site performs well against the site search sequence. While the site is partly Best and Most Versatile (BMV) agricultural land, the RDLP asserts it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land, benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, is within walking distance of the primary school and meets key policy requirements, including 50% affordable housing and net zero carbon homes.

The assessment considers neither our heritage nor landscape. The core of Shirenewton is a conservation area and the proposed site is in view from it. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements.

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

17. Would you like to comment on this question *

☐ Yes

☒ No

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

18. Would you like to comment on this question *

☒ Yes

☐ No

19. Is your representation in support or objection? *

☐ Support

☒ Objection

20. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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)

22. Would you like to comment on this question *

☒ Yes

☐ No

23. Is your representation in support or objection? *

☐ Support

☒ Objection

24. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles. Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.

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

25. Would you like to comment on this question *

☒ Yes

☐ No

26. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)4. Recreation Ground limitations. We have a small recreation ground that does not provide all the facilities our villagers desire – the cricket square competes for space with the footballers, there is no hard path, nor are there any dedicated outdoor activities for our teenagers other than a single tennis court (which is not free to use). At least half of the candidate site, which was originally 10.5 acres could more usefully be dedicated to the village for use as open space and those activities we sorely lack. In addition, the new homes families will have to cross the main exit route from the village to reach the recreation ground and a pedestrian crossing would be vital. The indicative contribution from the site developer towards recreational facilities is proposed at £26k based on current indicative cost. Our own costings show this would be significantly short in covering the cost of a hardpath and other facilities that we lack.

5. There is inadequate and unresolved infrastructure to support new development sites such as this and there is no realistic prospect that such services can be procured within the RDLP lifespan.

5.1. The Infrastructure Delivery Plan states there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter.

Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

5.2. We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

5.3. The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed

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)

28. Would you like to comment on this question *

☒ Yes

☐ No

29. Is your representation in support or objection? *

☐ Support

☒ Objection

30. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)The RDLP summary speaks of affordable housing within exemplar mixed sustainable and well-connected places. There is no policy provision how planning officers are to determine the "mix". In the absence of a policy, officers will be at risk of pressure from developers whose profit lies in building large houses. The plans for the existing new build site for 11 houses show a vast gulf between the outside and inside dimensions of the affordable houses in comparison to the executive style market houses. The draft RLDP appears to contemplate there will be a mix of affordable housing but in addition we consider 2 and 3 bedroomed market houses would provide a step onto the property ladder for our youngsters in order to retain them in our villages, and provision should be made for sheltered housing and bungalows for our disabled and elderly who wish to remain locally. There are many executive type houses in the village, and we have no need of any more.

The RDLP should empower MCC to determine and impose the exemplar housing mix to suit our village, taking account of our villagers' needs and concerns. Minimum plot sizes should also apply so as to avoid creating the back to back Victorian terraces of old.

The term "exemplar" should be defined by policies setting minimum standards (such as the old Parker Morris requirements) for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars, including visitors and forecourt charging for electric vehicles, and van deliveries and for a lower building density which does not degrade new developments into the back to back the Victorian terraces of old.

Policies should provide that affordable housing development cannot proceed without a housing association and its funding being in place. Without this in place the sale and occupation of the affordable housing is at risk as will be the bankruptcy of the developer.

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

31. Would you like to comment on this question *

☒ Yes

☐ No

32. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages. This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.

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

34. Would you like to comment on this question *

☒ Yes

☐ No

35. Is your representation in support or objection? *

☐ Support

☒ Objection

36. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.6.We have almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Only FTTC is available which limits broadband speed, and speeds in excess of 100mb/s inside houses are not available in the village. The service is overhead and prone to fluctuation in adverse weather. We are not aware of any BT plans to bring us superfast broadband within the time frame of the RDLP, which reduces the appeal of WFH and encourages continuing use of the roads.

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☐ Support

☒ Objection

39. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)Infrastructure is sorely lacking outside the main settlements. Most villages have no mains gas, electricity supplies are constricted and unable to meet rising demand for electric car charging, there is no priority for superfast broadband provision to tier 3 and 4 settlements and sewerage services through Mathern remain unfit for existing housing. Few of these settlements have a shop, school or surgery nor a bus service operating evenings and Sundays and bank holidays. The RLDP does not adequately address the need to make planning consent conditional on such infrastructure being fully upgraded prior to any development taking place. The risk is that initial plots on new developments will not be able to function as expected, raising the prospect of uncompleted sites and bankrupt developers unable to sell their newbuilds.

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

40. Would you like to comment on this question *

☒ Yes

☐ No

41. Is your representation in support or objection? *

☐ Support

☒ Objection

42. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

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

43. Would you like to comment on this question *

☒ Yes

☐ No

44. Is your representation in support or objection? *

☐ Support

☒ Objection

45. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.5.

We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.

Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.

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

46. Would you like to comment on this question *

☒ Yes

☐ No

47. Is your representation in support or objection? *

☐ Support

☒ Objection

48. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

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

49. Would you like to comment on this question *

☒ Yes

☐ No

50. Is your representation in support or objection? *

☐ Support

☒ Objection

51. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed limit for much of its length.

5.4. We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

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

52. 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?

53. 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>

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

☐ Yes

☒ No

55. 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)?

56. 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): *

In summary our objections are:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards
8. In other words, the development is not sound and undeliverable in its scale, and phasing does not provide a solution.

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.

57. 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

58. 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?

?? irrelevant

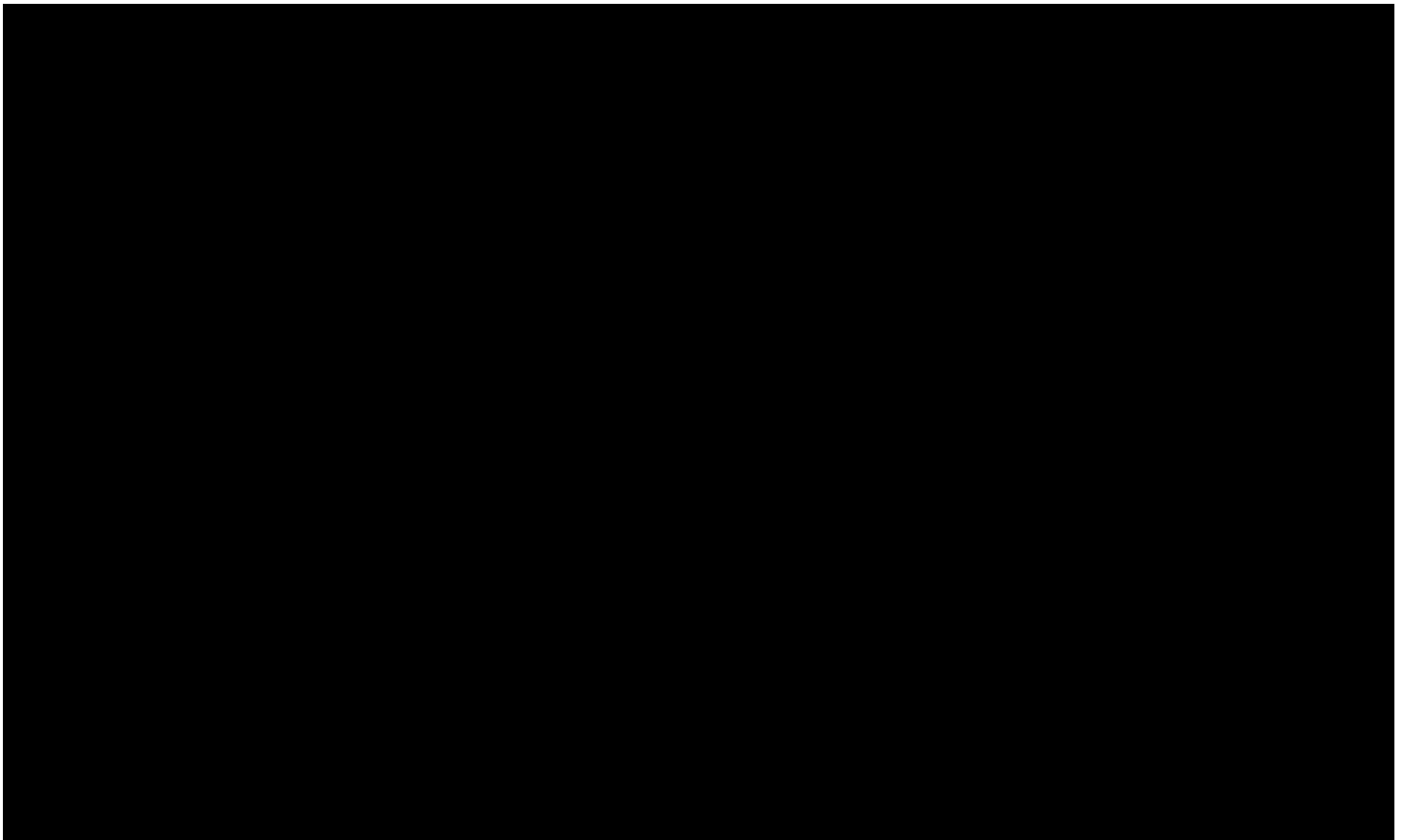
59. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Why do we need to increase welsh language use, have the people of Wales expressed this as a concern or need ?

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.

You are not obliged to complete these questions and can select 'prefer not to say'.



View results

Respondent

351

Anonymous

34:45

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)

Shirenewton Community Council

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.

*

Shirenewton Community Council's response to MCC's proposed RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres Policy HA18

SCC objects to the inclusion of this as a candidate site for the following reasons:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards.
8. In other words, the development is undeliverable in its scale, and phasing does not provide a solution.

Our objections are set out in full in our email to accompany this form as this response box does not expand sufficiently.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)
2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages . This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

.RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

Heritage and Landscape. The RDLP candidate site submission asserts overall :
that the site performs well against the site search sequence. While the site is partly Best and Most Versatile (BMV) agricultural land, the RDLP asserts it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land, benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, is within walking distance of the primary school and meets key policy requirements, including 50% affordable housing and net zero carbon homes.

The assessment considers neither our heritage nor landscape. The core of Shirenewton is a conservation area and the proposed site is in view from it. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements.

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

17. Would you like to comment on this question *

- ☐ Yes
- ☒ No

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

18. Would you like to comment on this question *

☒ Yes

☐ No

19. Is your representation in support or objection? *

☐ Support

☒ Objection

20. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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)

22. Would you like to comment on this question *

☒ Yes

☐ No

23. Is your representation in support or objection? *

☐ Support

☒ Objection

24. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles.

Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.

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

25. Would you like to comment on this question *

☒ Yes

☐ No

26. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)4. Recreation Ground limitations. We have a small recreation ground that does not provide all the facilities our villagers desire – the cricket square competes for space with the footballers, there is no hard path, nor are there any dedicated outdoor activities for our teenagers other than a single tennis court (which is not free to use). At least half of the candidate site, which was originally 10.5 acres could more usefully be dedicated to the village for use as open space and those activities we sorely lack. In addition, the new homes families will have to cross the main exit route from the village to reach the recreation ground and a pedestrian crossing would be vital. The indicative contribution from the site developer towards recreational facilities is proposed at £26k based on current indicative cost. Our own costings show this would be significantly short in covering the cost of a hardpath and other facilities that we lack.

5. There is inadequate and unresolved infrastructure to support new development sites such as this and there is no realistic prospect that such services can be procured within the RDLP lifespan.

5.1. The Infrastructure Delivery Plan states there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter.

Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

5.2. We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

5.3. The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed

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)

28. Would you like to comment on this question *

☒ Yes

☐ No

29. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

30. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)The RDLP summary speaks of affordable housing within exemplar mixed sustainable and well-connected places. There is no policy provision how planning officers are to determine the "mix". In the absence of a policy, officers will be at risk of pressure from developers whose profit lies in building large houses. The plans for the existing new build site for 11 houses show a vast gulf between the outside and inside dimensions of the affordable houses in comparison to the executive style market houses. The draft RDLP appears to contemplate there will be a mix of affordable housing but in addition we consider 2 and 3 bedroomed market houses would provide a step onto the property ladder for our youngsters in order to retain them in our villages, and provision should be made for sheltered housing and bungalows for our disabled and elderly who wish to remain locally. There are many executive type houses in the village, and we have no need of any more.

The RDLP should empower MCC to determine and impose the exemplar housing mix to suit our village, taking account of our villagers' needs and concerns. Minimum plot sizes should also apply so as to avoid creating the back to back Victorian terraces of old.

The term "exemplar" should be defined by policies setting minimum standards (such as the old Parker Morris requirements) for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars, including visitors and forecourt charging for electric vehicles, and van deliveries and for a lower building density which does not degrade new developments into the back to back the Victorian terraces of old.

Policies should provide that affordable housing development cannot proceed without a housing association and its funding being in place. Without this in place the sale and occupation of the affordable housing is at risk as will be the bankruptcy of the developer.

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

31. Would you like to comment on this question *

- ☒ Yes
- ☐ No

32. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

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RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages . This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.

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

34. Would you like to comment on this question *

- ☒ Yes
- ☐ No

35. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

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RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.6.We have almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Only FTTC is available which limits broadband speed, and speeds in excess of 100mb/s inside houses are not available in the village. The service is overhead and prone to fluctuation in adverse weather. We are not aware of any BT plans to bring us superfast broadband within the time frame of the RDLP, which reduces the appeal of WFH and encourages continuing use of the roads.

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

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RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)Infrastructure is sorely lacking outside the main settlements. Most villages have no mains gas, electricity supplies are constricted and unable to meet rising demand for electric car charging, there is no priority for superfast broadband provision to tier 3 and 4 settlements and sewerage services through Mathern remain unfit for existing housing. Few of these settlements have a shop, school or surgery nor a bus service operating evenings and Sundays and bank holidays. The RLDP does not adequately address the need to make planning consent conditional on such infrastructure being fully upgraded prior to any development taking place. The risk is that initial plots on new developments will not be able to function as expected, raising the prospect of uncompleted sites and bankrupt developers unable to sell their newbuilds.

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

40. Would you like to comment on this question *

☒ Yes

☐ No

41. Is your representation in support or objection? *

☐ Support

☒ Objection

42. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

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

43. Would you like to comment on this question *

☒ Yes

☐ No

44. Is your representation in support or objection? *

☐ Support

☒ Objection

45. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.5. We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.

Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.

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

46. Would you like to comment on this question *

☒ Yes

☐ No

47. Is your representation in support or objection? *

☐ Support

☒ Objection

48. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)
We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

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

49. Would you like to comment on this question *

☒ Yes

☐ No

50. Is your representation in support or objection? *

☐ Support

☒ Objection

51. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)
The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed limit for much of its length.

5.4. We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

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

52. 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?

53. 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>

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

☐ Yes

☒ No

55. 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)?

56. 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): *

In summary our objections are:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards
8. In other words, the development is not sound and undeliverable in its scale, and phasing does not provide a solution.

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.

57. 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

58. 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?

?? irrelevant

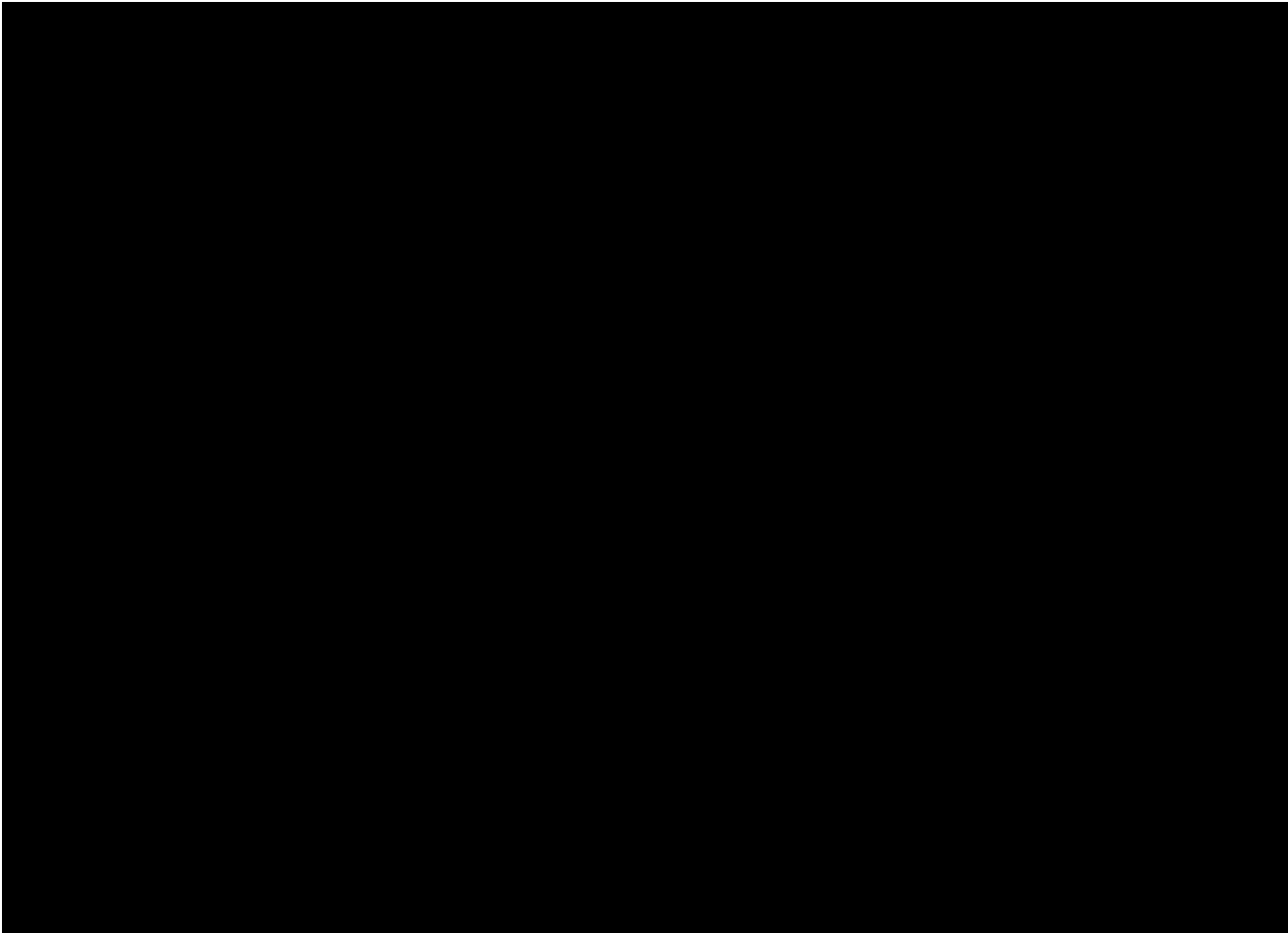
59. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Why do we need to increase welsh language use, have the people of Wales expressed this as a concern or need ?

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.

You are not obliged to complete these questions and can select 'prefer not to say'.



2550

Whitecastle Community Council

View results

Respondent

501

Anonymous

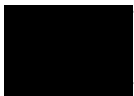
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Time to complete

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.

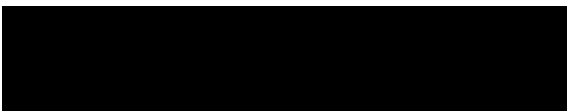
1. Title *



2. Name *



3. Job Title (where relevant)



4. Organisation (where relevant)

Whitecastle Community Council

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

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

15. 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)**

16. Would you like to comment on this question *

☒ Yes

☐ No

17. Is your representation in support or objection? *

☒ Support

☐ Objection

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

Policies H3 and H4

H3

Whitecastle Community Council notes that there are no main primary settlements (towns), secondary settlements (large villages) or main rural settlements in its community. There is only one Minor Rural Settlement in Whitecastle which is Llantilio Crossenny. The council supports the proposed planning regulations for Minor Rural Settlements which suggest that minor infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.

H4

Most of the community is made up of Rural Settlements. The council supports the proposed open countryside policies which will apply where planning permission will only be allowed for certain types of development, subject to satisfying detailed planning criteria.

Members of the council raised the following general points in relation to housing development in areas covered by policies H3 and H4.

Members emphasised the importance of ensuring that the architectural style of new housing complements existing designs to preserve the character and charm of the area. Concerns were raised regarding the affordability of housing, with many noting that current prices are often out of reach for younger generations. To address this, it was suggested that modular homes could provide a cost-effective solution to improve affordability. Additionally, members advocated for policies that prioritize housing for individuals employed in rural areas, ensuring that local workers have access to suitable and affordable accommodation.

**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?

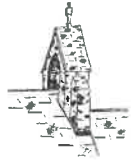
31. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

3059

Magor with Undy Town Council



MAGOR WITH UNDY TOWN COUNCIL Magwyr gyda Chyngor Tref Gwndy



Monmouthshire Replacement Local Development Plan (RLDP) Consultation 2024

Magor with Undy Town Council have given due consideration of the content of the RLDP and wish to provide their observations and representations following recent debate at Town Council meetings. I am instructed by Council that this representation is to be considered as an objection to aspects of the RLDP which impacts upon the communities of Undy and Magor.

Overview

Despite the Town Council and local County Councillors advocating to add into the RLDP the importance of local amenity space for Magor and Undy and the need to protect it, this does not seem to have been reflected in the document.

The Town Council and residents had previously submitted representations (Appendix 1) and plans in order to protect some of the few open spaces and amenity land that remain in and around our Town.

There seems to have been little regard or consideration of these previously submitted consultation responses.

The RLDP proposes to withdraw the buffer of open spaces identified in previous plans. Residents feel that it is vital to keep such a buffer.

Although MUTC acknowledge that there is no longer a legal requirement for Mon CC to protect the M4 safeguarding route to the boundary line they are deeply concerned that by not designating the area at Cowleaze as being of amenity importance (and as such protecting it) this could significantly decrease the amount of green open space available in the future. This area is widely used by residents.

Although formal recreational uses are defined in the AAI review as an area marked and laid out for formal active recreational purposes residents feel that as this area is one of the few open spaces remaining it should have been designated.

MUTC are concerned that Mon CC have concluded that there is no need to designate land in the RLDP as it is in open countryside and as such the protection that open countryside affords would not require further designation as amenity value or further specific protection.

Residents are very concerned that the RLDP considers that the countryside in itself has sufficient protection with no need for this area to be designated as protected amenity space within our Town.

Although Council recognise that this area do not meet the criteria to be designated as an area of amenity importance it is widely used by residents who deem it as such.

Council acknowledge that the plan has been led by the need for the provision of affordable homes close to vibrant Towns and Villages where people would be able to walk to amenities. The residents of Magor and Undy see protected green open spaces within their locality as an essential amenity for their health and well-being.

Observations and Representations

Yet again, this RLDP sees the largest distribution of growth in Severnside (35% residential and 65% employment) citing it as a sustainable settlement. It is not sustainable. The last LDP delivered a disproportionate and significant (circa 500) new dwellings in Magor with Undy, something like a 17% increase. Although there are no new housing allocations in Magor with Undy, the strategic development at Caldicot East and in Newport Glan Llyn, will have a cumulative impact on the road network. Integrated public transport schemes in policy ST5 pertaining to Magor and Undy must be delivered before houses in Caldicot East are occupied.

There is little or no regard paid to the Gwent Levels and to the Magor and Llandeenny SSSI in respect of the employment land proposed at candidate sites in Llandeenny. The cumulative impact of the failure to protect green infrastructure on the levels in favour of further developments on land allocated for employment such as at Magor Brewery is inconsistent with the principles of nature conservation and the declaration of a climate and nature emergency.

The siting of an Employment land allocation in this location in or adjacent to the Llandeenny and Redwick Site of Special Scientific Interest is in direct conflict with the advice given in paragraph 6.4.25 of Planning Policy Wales 12 which states that development in or adjacent to a SSSI which is not necessary for the management of the site must be avoided. The proposed development is not necessary for the management of the site and must be avoided at all costs, in particular the Waste Management classification.

The RDLP proposes removing DES 2 classification from the buffer zone between Magor with Undy and the M4. Council remains concerned that this leaves this land with significantly less protection than before because there is some class of development allowed on this classification as per national planning policy. Whilst this may be on an exception basis, this is still not satisfactory and the land ought to be either AAI or Green Wedge.

Policy S2 states that outside of Tiers 1 – 4 open countryside policies will apply and a definitive list of what is development is allowed is provided. Para 7.1.3 states for the purposes of the RLDP, open countryside is defined as land outside the defined settlement boundaries.

BUT there are many other policies allowing development other than the definitive list in S2 adjacent to settlement boundaries and therefore in open countryside:

H7 - Specialist Housing

E2 – Non-Allocated Employment Sites

S11 – Rural Economy

RE1 – Secondary and main Rural Settlements Employment Exceptions

S15 – Community and Recreation Facilities

There is a conflict and it is misleading. Policy S2 needs updating to include these.

Council is also concerned about the long-term sustainability of Health infrastructure locally.

Appendix 1

[REDACTED]

commissioned by Magor with Undy Town Council to response to identification of suitable land for Gypsy and Traveller pitches and also included within the RDLP.

Magor with Undy Town Council

Magor with Undy Town Council Understands the Monmouthshire Council's duty to address the identified needs for Roma, Gypsy and Traveller Pitch Provision.

The Town Council notes that Dancing Hill has been removed from the process by the Cabinet Member for Sustainable Economy and then formally at the Cabinet meeting of 4th October 2023. However, the Council has commented on the suitability of Dancing Hill as the reasons provided in the Cabinet report are almost identical to the issues at Langley Close and furthermore the report states one of the reasons for removal is that other sites are available. To this end, should any of the other sites be ruled out, the Town Council would not wish to see Dancing Hill ruled in. The Town Council believes that both sites are wholly unsuitable for Gypsy and Traveller accommodation. The Cabinet report of 4th October contains the following paragraph.

3.9 Given a combination of the known historic land contamination, possible noise issues, access issues and location immediately adjacent to a Site of Importance for Nature Conservation (SINC), officers recommend that Dancing Hill West is removed from the process as alternatives are available.

Furthermore, the Town Council wishes to draw attention to the process, which it has found wholly unsatisfactory. The identification process appears extremely subjective, and the level of inconsistency and error suggests that those involved were not familiar with either Langley Close or Dancing Hill during the selection process. The Town Council noted with interest that the cross-group Pre-decision scrutiny meeting concluded that all the sites were unsuitable for Gypsy and Traveller accommodation. The People Scrutiny committee of 19th July, chaired by Cllr Crook resolved to support Option 3, not to recommend any of the sites to Cabinet to be formally consulted upon but instead to recommend that Cabinet returns to the drawing board.

The Town Council has sought to inform and engage residents in the land identification process. The Council has also engaged with Travelling Ahead.

Submission to object to potential candidate allocation sites for Gypsy and Traveller pitches, at Langley Close, Magor

1. Magor with Undy Town Council has approved this submission which seeks the removal of the following sites from consideration for allocation for development of gypsy and traveller pitches in the review of the Monmouthshire Replacement Local Development Plan (MRLDP). The sites in question are as follows:

- Land off Langley Close, Magor
 - Land off Dancing Hill, Magor
2. In support of this submission, a number of separate points are made under headings in the sections which follow.

Site identification and Assessment Process

3. It is understood that no Candidate Sites for Gypsy and Traveller Accommodation were put forward in the Monmouthshire Council's initial or second call for sites exercise. In accordance with Welsh Government Guidance, the council is investigating the potential of providing the accommodation identified as required through the Gypsy and Traveller Accommodation Assessment, on land it owns.
4. An initial assessment of 1500 sites filtered out sites which could not meet a minimum area requirement of 500 square metres, were located in areas of flood risk and which were County Farm holdings, and other criteria. This led to the retention of 70 sites. A second assessment updated the consideration of flood risk in accordance with updated TAN15, with 50 sites remaining.
5. Throughout, sites with uncertain inputs were carried forward to the next stage. 17 sites were subject to a RAG assessment and five have been put forward to members of Monmouthshire County Council for consideration and a decision on whether to proceed to consultation on potential allocation for the development of Gypsy and Traveller accommodation.
6. Within Magor with Undy, two sites have been included in the final five. The first site is land off Dancing Hill and the second site is Land off Langley Close. On the traffic light (RAG) assessment of 35 (assessed) criteria, more than one third are yellow or red for each site.

Consideration of farming activity and agricultural land quality

7. It is suggested that, if following the assessment methodology used in earlier stages of the MCC land evaluation, the presence of land in active farming use should have led to the land at Dancing Hill and at Langley Close to be removed from the assessment at Stage 2 or earlier.

8. Having reviewed the RAG assessment for both sites they currently have tenants who use the land for agricultural process and that re-development of the land will require serving of eviction notices. This will result in not only loss of agricultural land contrary to both the Planning Policy Wales and the adopted Local Plan but also loss of livelihood to the tenants.
9. Separately, the Planning Policy Wales identifies that agricultural land of Class 1, 2 and 3a should be protected and this should be considered within the local development plan. Presumably, this should also apply to the allocation of Gypsy and Traveller Sites with the local development plan.
10. A consideration of the potential loss of Best and Most Versatile Agricultural Land is a key criterion in Stage 3A of the Candidate Sites Assessment but is absent from the MCC Land Evaluation for Gypsy and Traveller Sites. It would be appropriate to consider the loss of this resource in the land evaluation alongside the presence of active farming activities on land under consideration.
11. Land at Langley Close is considered to contain best and most versatile agricultural land, designated as Class 3A (Good Value). There is a presumption within the Planning Policy Wales against loss of agricultural land, which is also reiterated in paragraph 6.2.25 of the Adopted Local Plan. Specifically, the ALP requires that agricultural land is protected from inappropriate development. Clearly non-agricultural built development fails the obligations of both the PPW and ALP.

Reported feedback from RAG assessment of shortlisted sites

12. The 19 July 2023 MCC Scrutiny Committee Report on 'Meeting Gypsy and Traveller pitch needs – land identification' includes a table of sites after paragraph 3.3. The summary/main conclusion for the Langley Close site in this table indicates 'no significant feedback received to suggest the site's suitability shouldn't be considered further'.
13. In fact, clear concerns are raised in the RAG over the placement of Gypsy and Traveller pitches in proximity to the M4 motorway on both the Langley Close and Dancing Hill Sites (on noise and air quality grounds). Additional objections to Dancing Hill are raised by the EHO in relation to introducing human receptors onto the old landfill site. On Ecology, there are clear recommendations within the RAG Assessment to not proceed further with this site. At Langley Close, there are also concerns about ecological impacts.

14. In short, the summary of RAG assessment significantly underplays the constraints on Langley Close and on Dancing Hill. At Dancing Hill, to address some constraints would appear mutually exclusive, for example addressing concerns about amenity (leading to considering of a buffer between new development and existing residents to the south, and health (leading to not developing gypsy and traveller pitches right next to the motorway to the north). The site is only 90m across from the boundary of adjacent houses to the motorway hard shoulder. This is before ecological corridor and important hedgerow (which bisects the northern part of the site) considerations come into play.
15. At Langley Close, similar conundrums are present. The site is an irregular shape, dissected by 2 ancient hedgerows which split the site into 3 smaller sites. This reduces the useable space in the eastern triangle to 1.72 acres, the western area to 1.9 acres and the northern area to 0.24 acres. Much of the Langley close site is within 50 metres of the M4 motorway. At the narrowest point, the site is 50 metres from neighbouring houses to the tree buffer and the Junction 23 off slip. The creation of any buffer would render much of the site unusable. A new on-site access road will reduce useable space further. There are also setting considerations for the nearby listed buildings, a similar requirement to locate away from existing housing and yet also away from the M4 motorway adjacent and ecological constraints which are part of the same issues raised at Dancing Hill – these two sites exist within an open nature corridor between the built settlement of Magor and Undy, and the M4. Development within it will compromise its function. Langley Close site is also located around 70m from a local SINC. Proximity to the SINC along with the other constraints ought to have seen the sites removed at an earlier decision point.
16. Whilst marked green in the RAG, the Langley Close site is 1km from shops, schools and community facilities – the bus service is infrequent. Access considerations for the suitability of Candidate Sites in the call for sites exercise revolve around reducing the need to travel to access essential services. 1km is considered too far for regular walking trips to access essential services on a daily basis. Whilst the site at Dancing Hill is closer to town (around 700m, at the more distant end of a walkable neighbourhood) this has a gradient.
17. The RAG shows both sites as designated DES2 amenity land. Development within these locations is not supported. This is a matter of principle and should be sufficient to remove the sites from consideration.

18. Travelling Ahead comments in the RAG rejected the Dancing Hill site on grounds of proximity to the M4 and to existing residents. Comments on Langley Close raised concern over the proximity of the site to the M4.
19. In summary, it should be evident from the RAG alone that significant doubt exists over the viability, deliverability and sustainability of the Langley Close and Dancing Hill sites such that it would seem prudent to exclude them from further consideration. The starting point for any potential application on the sites would be subject to these significant doubts and requiring costly technical assessments for significant matters including land contamination, air quality, noise, ecology, highways, landscape and heritage. Potential mitigations (should these be considered possible are likely to be costly, eg for site remediation, noise impact mitigation, landscaping and access works.
20. Some of the matters raised in the RAG and discussed above are explored in more detail below to illustrate the significant barriers to delivery of a development on the sites at Langley Close and Dancing Hill.

Noise Conditions

21. The noise conditions likely to exist at the Langley Close and Dancing Hill sites can be illustrated through review of technical reports submitted in support of the approved development of 155 dwellings at Vinegar Hill (DM/2019/01937) is located adjacent to the M4 motorway, 150 metres to the east of the site at Dancing Hill. An Environmental Noise Assessment was submitted to discharge conditions 25 and 40 of the planning permission (in relation to parcel B). This indicated that environmental noise conditions arising from M4 motorway traffic (based on a 2018 noise survey undertaken for the original application) were between 60.2 and 61.1 dB during daytime hours (07:00-23:00 hours) and between 56.9 and 58dB during night-time hours (23:00-07:00 hours) at a survey position approximately 90 metres from the motorway – a 3db difference between daytime and night-time. (The 90m distance approximates to the distance between the southern boundary of the Dancing Hill Site, to the hard shoulder of the M4 Motorway to the north).
22. According to British Standard 8233:2014, noise levels inside living rooms should aim (there is a 5dB leeway) to be no higher than 35dB during the daytime period and no higher than 30dB in bedrooms during the night-time period, so surveyed noise levels were well above acceptable levels. However, through modelling of noise levels, the noise attenuation effects of three-dimensional buildings and structures were considered, as were the noise attenuation properties of building facades. For the

nighttime, if an open-window would produce higher noise levels inside bedrooms, then acoustic glazing and trickle vents to provide air-flow could be incorporated into building design and this was considered to be acceptable.

23. Noise levels in outside garden spaces should not exceed 50dB – the effect of noise attenuation through the development orientation and layout ensures can be achieved (though some leeway is allowed in guidance for the ‘convenience and benefit’ of living next to a motorway, the implication being that there are all sorts of services and facilities which go along with strategic transport infrastructure that make this a consideration worthy of living with more traffic noise).
24. The above process through which a seemingly difficult noise environment can be made to work for a development would be much harder to address for a gypsy and traveller accommodation site next to the M4 motorway. This is simply due to many of the development characteristics of a housing site being absent – there is not an extensive fixed layout of substantial 3D Structures to dampen and absorb noise – caravans are not fixed but come and go. The noise attenuation abilities of caravan facades are significantly lower than traditional houses. The design mitigations required to make internal noise levels in bedrooms during the night-time cannot be controlled through a planning permission as the caravans are likely to already exist and may not possess the required features – the noise environment has to be suitable without caravan design mitigation. Finally, people living in caravans (which is small accommodation in terms of available internal floorspace) tend to live life outdoors to a greater extent and so the treatment of noise in outdoor spaces becomes more important.
25. In order to achieve a suitable separation from adjacent housing on both Dancing Hill and at Langley Close, it is highly likely that development would need to occur closer to the motorway.
26. In summary, sites adjacent to the M4 motorway should not be considered suitable for Gypsy and Traveller Accommodation owing to a negative noise environment which cannot be mitigated through building design and owing to the operational aspects of such sites which create more exposure of site users to high levels of noise.
27. Noise impacts should be indicated as a ‘red’ in the RAG assessments of the Langley Close and Dancing Hill site. It is contended that further survey work would only confirm this position or at best indicate an extremely marginal noise environment position which, in the forward planning of gypsy and travellers sites, should not be

considered further. There is significant noise pollution risk and both sites are highly likely to fall into Noise Exposure Category C or D (TAN 11). This means that planning permission for residential dwellings should not normally be granted (C) or should be refused (D).

Air Quality

28. Previous modelling to assess the impacts of the consented development at Vinegar Hill assessed the impact from existing traffic and from proposed development in relation to emissions for NO², PM₁₀, or PM_{2.5}. One property on Grange Road (Receptor 2) was located approximate to the northernmost part of the Dancing Hill site, across the road to the east. With development and sensitivity variables factored in, this location was shown in the range 36.5µg/m³ to 39.2µg/m³ in relation to the annual mean objective of 40µg/m³ for Nitrogen Dioxide. A further receptor (receptor 3) located to the south along Grange Road approximated to the southern extent of the Dancing Hill sites and emissions levels projected here were lower.
29. The Welsh Government has set objectives to lower air pollution and this means reducing impacts from development to levels well below Air Quality Objective levels, given the potential for negative health effects to occur even with lower emissions. Active forward planning of allocation of sites should ensure that sites that would introduce sensitive human receptors in locations with air quality conditions close to the Objective Levels are not considered further.
30. The assessment at the above site was based on predicted traffic for 2018 projected to 2021 and through the decade. Air Quality Assessment outcomes in relation to existing receptors (such as the Dancing Hill site) in this location are highly sensitive to traffic levels on the M4. Since 2018, significant events have occurred with relevance to traffic flows on the M4, including the COVID-19 Pandemic (which might reduce or alter flows as more people now work from home) and the removal of tolls on the Severn Bridge (which it is predicted have boosted traffic flows going over the bridge).
31. At this stage of consideration, further work to assess air quality would be required to determine whether any development can take place at Dancing Hill and Langley Close given the potential for impacts on health to arise from traffic on the M4. Air Quality impacts should be indicated as red in a RAG Assessment of this site.

Site Access, access routes and proximity of services

32. The Dancing Hill Site would be accessed from Grange Road. At present there is a gate providing access off Grange Road into a northern field separated from the southern field in the land parcel by a hedge. There is no formal access from Grange Road through the gate and this location would be unlikely to be considered acceptable given its position to the north of the site close to the bend.
33. The road leading up to the site at Dancing Hill has priority given to northbound traffic – the road is narrow between existing housing. Access to the site would be from a southerly direction through the narrow section of road. Other routes via Grange Road require the use of narrow country lanes for onward travel to the wider main road network. Going south, Grange Road turns into Dancing Hill which connects with the B4245, providing a route into Magor and out to the wider road network east and west.
34. The suitability of the route to the site, and the potential for the creation of a workable access into it, will depend on the scale of proposed development and traffic generated from this. There is a question mark over suitability of the upper part of the route approaching the site, for regular use by vehicles towing caravans.
35. The same roads south provide a pedestrian route across the B4245 to the village centre and local schools, around 600m to the shops and pubs and 700m to the schools. The route runs downhill to town centre and uphill to the Dancing Hill Site. The gradient might discourage cycling to and from the site. The site is toward the limits of what would be considered walkable on a daily basis.
36. The site is located outside the settlement edge of the village, close to the motorway. There are immediate neighbouring houses, but the overall position is that the site is relatively distant from local services when the gradient of the hill is considered as a potential barrier to movement on foot or by bicycle.
37. In vehicle access terms, with regard to road routes to and from the site to the wider road network, these exist in one direction and are technically constrained for caravans near to the site. The access route should be regarded as Red in a RAG assessment.
38. Access to services is at the limit of acceptability for walking given the topography and should be regarded as Yellow also in a RAG assessment.
39. Access to the Langley Close Site would require a new access from St. Bride's Road, necessitating the removal of ancient hedgerow. St. Brides Road is narrow and a single-

track road adjacent to the proposed site for allocation. In relation to the possible allocation for a Travellers site, guidance prepared by the Welsh Government titled “Designing Gypsy and Traveler Sites” states that access road to the site should be at least 5.5m and be able to accommodate vehicles of up-to 10m length. St Brides Road does not meet these requirements. Welsh Government guidance also states that a footpath of at least 0.9m wide is required. This is absent from the Langley Close site. Therefore, the Langley site fails to achieve minimum access requirement provided by Welsh Government and should be screened out. It is understood that this is consistent with the consultation response given by the Traveller Community via the People Scrutiny Committee. The Council’s Highways Engineer has stated in the RAG Document that the development at Langley Close will have a significant impact on the safety and capacity of the immediate local network, the existing access is unsuitable and a new access to the site will need to be created. Access limitations for both sites fail the obligations under Policy H8 of the ALP.

40. Whilst there is an existing stub off St Brides Road this appears to connect to residential gardens and a new access will be required. St Brides Road is on a bend at this point with no real opportunity for creation of a suitable visibility splay to allow safe access and egress from vehicles entering Magor from the North.

Leisure Corridor

41. The Dancing Hill and Langley Close sites are located within a buffer of undeveloped land running between the northern edge of Magor and Undy and the M4 motorway. The Dancing Hill site is located at a point where the buffer connects to woodland running south through Magor. Land further to the east was also buffer, but is now under construction for housing.
42. The designated public footpath network in the area has a missing link across the Dancing Hill site, needed to make a connection from footpaths to the west with those to the east, across the northern edge of Magor and Undy. The Dancing Hill site crossed by walkers to continue a west-east, using paths which are not formally designated public rights of way.
43. Development of any kind at this location has the potential to disrupt the site’s function in facilitating a leisure corridor and connection.
44. The Monmouthshire Green Infrastructure Strategy (2019) recognises the range of scales and connectivity through which green infrastructure functions and is provided.

At neighbourhood scale, important green infrastructure resources include amenity greenspaces (such as land designated under policy DES2) and urban woodlands (such as that extending into the heart of the settlement from the Dancing Hill site and wider buffer gap to the north of the settlement. Important connections include pedestrian paths and rights of ways, green links and corridors, such as those provided at and through the sites at Langley Close and Dancing Hill. The development of these sites would impact on functioning, designated green infrastructure resources important to the local community.

45. The function and value of land south of the M4, sitting between it and the edge of Magor, is already recognised in the adopted local plan. Policy DES2 designates areas of amenity importance. These are designated in recognition of the value of land in providing amenity space where it might otherwise be lacking.
46. DES2 sets criteria for development to be considered acceptable within Areas of Amenity Importance. The policy states that there should be no unacceptable adverse effect on any of the following:
47. ***Visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces.*** The Monmouthshire Landscape Sensitivity and Capacity Study (Oct 2009) identifies both the Dancing Hill site and the Langley Close Site within Site MA05. The candidate sites are part of an important buffer (gap) between the settlement and the M4 motorway. Dancing Hill site is in a narrow gap between the settlement and the motorway and is elevated providing a vista from the west to the east and from the settlement edge. Development of the site would intrude into this vista. The Langley Close site is considered to be high to medium sensitivity owing to its more positive relationship between the settlement and the countryside, afforded by public rights of way links. This would be highly sensitive to development. Landscape sensitivity might be considered medium directly adjacent to the motorway, but then this would be unacceptable from an amenity and health impacts perspective. An update to the above assessment was carried out in 2020 and this confirmed the sensitivity of the areas discussed to new development. It said that should development be considered, the mitigation discussed would involve significant and heavy screens of tree planting. It is contended that this would remove one of the essential features of this area which is the vistas it affords. This would be a significant disbenefit to users of this important amenity area.

48. ***The relationship of the area of amenity importance to adjacent or linked areas of green infrastructure in terms of its contribution to the character of the locality and/or its ability to relieve the monotony of the built form.*** If development intrudes into the gap between the settlement edge and the M4 motorway to the north of Magor and Undy then an essential rural village characteristic of the settlement will be eroded and lost. Without the gap, development will spread to the M4 motorway, providing a hard unpleasant edge to the settlement which currently is buffered by agricultural land for the most part. Access to countryside to the north will only be possible by travelling under or over the M4 in a few places. Bearing in mind that the railway to the south of the settlement severs Magor and Undy from the levels to the south, access for local people to amenity areas and countryside is already constrained. For this reason, development in the countryside to the north of the settlement should be avoided.
49. ***The role of the area as a venue for formal and informal sport, general recreation and as community space, expressed in terms of actual usage and facilities available as well as its relationship to general open space requirements as set out in policy CRF2.*** The sites at Dancing Hill and Langley Close are within an area which is extensively used for walking via formal public rights of way and informal pathways. These link the settlement to the countryside and provide opportunities for users to experience views and vistas and escape the urban settlement without crossing the motorway. The dancing hill site sits at an important fulcrum of paths extending west and south. The site affords east west informal walking paths. Development of the site would adversely impact this important resource. The Langley Close site is more sensitive to development for the same reason in that the site provides a positive link between settlement and countryside as identified by the landscape sensitivity and capacity study.
50. ***The cultural amenity of the area, including places and features of archaeological, historic, geological and landscape importance.*** The Langley Close site lies within the setting of a listed building and both this and the Dancing Hill site are identified as have high to medium sensitivity to new development in landscape assessment terms, as discussed above.
51. ***The nature conservation interest of the area, through damage to, or the loss of, important habitats of natural features (policy NR1 applies).*** In response to the RAG assessment, the ecology officer from Monmouthshire County Council has raised

concerns over both Langley Close and Dancing Hill in terms of the impacts of development of these sites on wildlife and habitats. This is discussed further below.

52. It is noted that the RAG Assessment proposes to remove DES2 Area of Amenity Importance status from the Langley Close and Dancing Hill sites. From a local community perspective it is not clear how or why the existing designated area of amenity importance can be considered to be less important than it was previously, to a degree which would remove these policy protections and actively promote development within the area.

Ecology and Wildlife

53. Should the sites be developed, the new access will be required with loss of existing trees and hedgerows. The removal of the ancient and ecologically rich hedge will cause environmental damage and fails the obligations under Policy S13 of the Adopted Local Plan.
54. Both sites contain areas of trees and woodland which can support wild life. In addition, their greenfield nature and location creates a green corridor which supports and allows movement of wildlife so creating a green corridor between the M4 Motorway and the urban development of Magor and Undy.
55. Ecological Connectivity Assessment of Settlements in Monmouthshire Report produced by Gwent Ecology looked at opportunities to strengthen existing habitat connectivity. Including Pg 42 paragraph 2) "Strengthen the St Brides Brook Mill Reed Corridor, the main semi natural corridor through the urban zone of Magor and Undy". This will be further eroded by the proposed development not improved.
56. Monmouthshire County Council declared a Climate Emergency one of the key actions is to embed biodiversity throughout decision-making; reduce key pressures on species and habitats; supporting landscape scale nature recovery projects and partnerships to enhance ecosystem resilience. Construction of built development on either site contravenes these obligations and commitments.
57. Policy GI 1 of the Adopted Local Plan requires planning to maintain, protect and enhance green infrastructure networks. There are also requirements within Planning Policy Wales to providing resilience in the eco system, halting and reversing loss of biodiversity, management and enhancement of green infrastructure. Construction of built development on either site contravenes these obligations.

58. The proposed allocation of the site for built development risks damage to nature conservation interest of the area, through damage to, or the loss of, important habitats or natural features and is therefore contrary to policy NE1 of the Adopted Local Plan.

Neighbours and Amenity

59. The Dancing Hill Site has neighbouring residential properties along the southern boundary, and across Grange Road to the east in the northeast part of the site. The Langley Close Site is an irregular shape and is bounded on four sides by residential properties on St. Brides Road, Langley Close, Newport Road and by Grade 2 listed Woodland House. Given the matters raised about the strong potential for noise impacts and air quality impacts on the occupants of both sites, it is highly likely that, should either site be developed for Gypsy and Traveller accommodation, the need for a buffer between the development and the M4 might compromise land use and a suitable landscaped buffer from existing residential development.
60. We understand that the identification of sites and progression of proposal to potential site allocations for Gypsy and Traveller Sites should be undertaken in consultation with the Gypsy and Traveller community. In this instance, we understand that consultation has taken place and that the response from the Gypsy and Traveller community was that neither the Langley Close site were considered suitable owing to the poor noise and air quality environment and because of proximity to neighbouring development. Whilst the issue of proximity is difficult, because a clear aim in policy is to improve integration and reduce isolation in these communities, the response from the Gypsy and Traveller community in these cases indicates significant environmental constraints with the sites, potentially perceived to affect health. The response also indicates a concern about exposure of the sites to potential conflict in land uses (referring to the role of this land in providing a buffer and leisure walking routes).
61. The noise and environmental conditions are likely to result in a need to place the development in the areas furthest from the motorway, close to existing homes. A significant buffer may not be possible.

Conclusion

62. Whilst the need to identify sites for gypsy and traveller accommodation is recognised, the identification of sites at Dancing Hill and Langley Close are considered to be ill-suited for the purpose, because they are too close to the motorway, giving rise to

significant potential amenity and health concerns. Any mitigation of such impact (considered that these would be unsuccessful would in any case rely on moving the development closer to existing residential development and to other receptors (listed building). Development in these spaces would intrude into sites which are used for leisure and recreation purposes and cause landscape sensitivity impacts. Development in an important buffer to the north of the settlement will erode it and lead, eventually, to the settlement extending to the edge of the motorway. Site accessibility by vehicles is constrained by the local road networks. One site is a former landfill with potentially significant remediation requirements. From a constraints perspective, these sites are significantly constrained and there is a low level of likelihood that these can be overcome through technical assessments and mitigation measures.

63. Apart from this, both sites are considered isolated from local community surveys through a combination of distance (1km from Langley Close site to local schools) and topography (Dancing Hill is elevated and 700m distant from the school). Public transport is limited to an infrequent local bus service.
64. Magor with Undy Town Council strongly recommend the removal of sites at Langley Close and Dancing Hill from further assessment and consideration, so that they remain free from development and retain their important functions.

3168

Roadchef Motorways Limited

Planning Policy / Polisi Cynllunio

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10 December 2024

Dear Monmouthshire County Council Planning Policy Team,

Representation: Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033 Deposit Plan Consultation: 4th November – 16th December 2024

Introduction

- 1.1 This letter is submitted on behalf of our client 'Roadchef Motorways Limited' in respect of the above consultation, which closes on the 16th of December 2024.
- 1.2 Overall, our client supports the aspirations of the RLDP, and most importantly, the removal of land at Langley Close, Magor as a future allocation for 'gypsy and travellers'. The removal of this allocation, follows representation made by our client in December 2023 on the 'Proposed Gypsy and Traveller Sites Consultation'. A copy of the representation is attached to **Appendix 1**.
- 1.3 The purpose of this representation is to also respond to policies relating to freight transport, and the need for additional Lorry and Heavy Good Vehicle (HGV) Parking. On this point, Roadchef operates an existing Motorway Service Area (MSA) at Junction 23a of the M4 (Magor Services). The MSA provides travellers (commercial and domestic) with a safe and convenient location for rest, alongside the opportunity to refuel/recharge, and have access food and toilet/shower facilities. On this point, MSAs are essential to the safe and efficient operation of the motorway, and connecting link roads, via the delivery of essential parking and supporting facilities.
- 1.4 Our representation also provides commentary on draft other policies relating to development in the open countryside, advertisement, and mineral safeguarding.
- 1.5 Our comments are outlined below, under appropriate sub-headings.

Gypsy and Traveller Policies – Strategic Policy S9 and Policy GT1

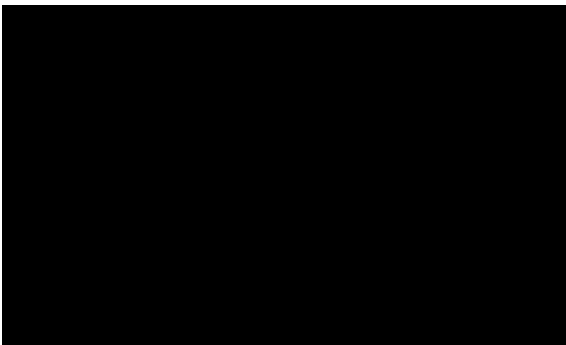
- 1.6 As outlined at para 1.2 above, Roadchef supports the removal of land at Langley Close Magor as a future 'gypsy and traveller' site; on the grounds that the provision of an access along the site frontage represents a safety concern, given the inability to achieve appropriate visibility, in line with design standards.
- 1.7 It was also noted in our representation that proposals at this location would also result in the loss of a considerable area of mature hedgerow, which would fail to mitigate the 'impacts' of development on the local landscape. The access would also fail to provide easy access for Fire and Rescue services and ambulances, and therefore, represents a health and safety risk.
- 1.8 Based on the above, we support the **removal** of land at Langley Close/St Brides Road as a gypsy and traveller Site in the RDLP. A position supported by the wording of Draft Policy GT1 which requires proposals for this form of development to demonstrate 'a safe and convenient access to the highway network and not cause traffic congestion or safety problem'. On this point, we support the criteria outlined in Draft Policy GT1.

Sustainable Transport Policies – Policy ST3

- 1.9 Draft Policy ST3 'Freight' seeks to ensure the efficient movement of freight and reduce heavy road freight traffic through developing rail freight facilities, safeguarding existing rail sites and facilities, and promoting sustainable last-mile solution.
- 1.10 Our view is that the wording of this Draft Policy represents an opportunity to address the national need for Lorry and Heavy Good Vehicle (HGV) parking.
- 1.11 Expanding on the above, the Welsh Government's 'National Transport Delivery Plan 2022 to 2027' acknowledges that the industry is currently facing an HGV driver and wider skills shortage. Whilst these shortages have been developing for a few years, they have been accelerated by the combined effects of Brexit and the Pandemic. The shortages of drivers have also highlighted further factors that have been affecting the attractiveness of the sector. It is noted that this is a national issue, intrinsically linked to the need for safe and secure HGV/ Lorry parking.
- 1.12 Expanding on the above, we consider that there is an opportunity for the Draft Policy to include wording to support the requirement for providing 'safe and secure' overnight lorry parking facilities; taking into account any local, regional or national shortages; logistical requirements; opportunities to drive zero emissions transport; and support the welfare needs of drivers.

Other

- 1.13 Draft Policy OC1 'New built development in the Open Countryside' states that there is a presumption against new built development in the open countryside, unless justified under national planning policy.
- 1.14 A list of criteria is outlined in the draft Policy to enable development at this location. On this point, MSAs serve the strategic road network and therefore located beyond settlement boundaries, and thus, within the open countryside. As such, we support the inclusion of criterion (b) relating to new buildings. However, support must also be offered to other forms of development where required for their continued operation.
- 1.15 Draft Policy PM3 'Advertisement' outlines a list of criteria proposals must satisfy, which Roadchef broadly supports.
- 1.16 As per guidance outlined in the Government's Circular 01/2022 - encouraging drivers to take regular breaks is the Government's primary objective for MSAs, which operate on a 24hr basis. Roadchef's MSA at Junction 32a on the M4 (Magor Services) is located within the open countryside, as are many MSAs, given their role to serve the strategic road network.
- 1.17 Importantly, the Site is well utilised by leisure travellers, long-distance commuters, and HVG/Lorry drivers. The requirement for advertisement to direct travellers into the Site, and make drivers aware of the services available, is therefore crucial to its operation. On this point, it is important that draft Policy PM3 does not exclude development in this location, especially for this type of operation, which is linked to highway safety. We consider that the matter could be addressed at para 8.4.3 (supporting text) - noting importance of signage to serve the strategic road network.
- 1.18 Finally, Magor Services is located within a mineral safeguarding area. Draft Policy M2 'Mineral Safeguarding Area' is noted. The purpose of safeguarding is not to prevent other forms of development, but to ensure that the presence of the resource or infrastructure is taken into account when other development proposals are being considered. This should be reflected in the wording of the Policy, especially for established businesses.
- 1.19 If you have any queries and/or wish to discuss matters further, please do not hesitate to contact me via the details provided below.





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Astrum Planning

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22 December 2023

Representation on Proposed Gypsy and Traveller Sites Consultation

- 1.1 This letter is submitted on behalf of our client 'Roadchef' in respect of the above consultation, which closes on the 22nd of December 2023.

Background

- 1.2 Our client is aware that Monmouthshire Sir Fynwy County Council ('The Council') are currently in the process of preparing a Replacement Local Plan, with Draft Strategic Policy S8 'Gypsy and Travellers' requiring the accommodation needs of gypsies and travellers to be identified, and addressed through the identification of land, based on the latest Accommodation Assessment. We note that this Policy has not been examined by an Inspector, and will be subject to scrutiny as part of the Local Plan process. The current adopted Local Plan for the Council - Policy H8 'Gypsy, Traveller and Travelling Showpeople Sites' sets a list of requirements for accommodation to be found suitable. A number of appeals have been tried and tested against this Policy, in the backdrop of a shortfall in provision.
- 1.3 The Council's Draft Gypsy and Traveller Accommodation and Needs Assessment of 2021 (GTANA) provides evidence of a need for nine residential pitches between the period 2020 – 2025 and a further four pitches for the remaining Plan period of 2026 – 2033, giving a total need of thirteen pitches until the end of Plan period. However, reference is drawn to a recent Cabinet Report, dated October 2023; where at paragraph 3.10, Officers noted that of the thirteen pitches needed, two pitches have been granted planning permission. This reduces the pitch requirement to eleven. The report to Cabinet also noted that discussions were ongoing between the Council, and two households about the possibility of obtaining planning permission on private sites which could significantly reduce the overall pitch requirement.
- 1.4 In support of continued engagement with the two households, the findings of the GTANA process suggests that there is an aspiration within much of the Gypsy Traveller community for private site provision in Monmouthshire. Regarding the provision of land, it is evident from our review of the GTANA, that land suitable for caravan provision should be promoted¹, as this is the preferred accommodation. It is therefore our position, that the Council should be continuing dialogue with these households, to ensure the most appropriate sites are delivered. We understand that the Council has written to the owners of the three 'suitable sites' to determine if there is any interest in selling or leasing this land to the Council. The Council have stated that if landowners of suitable sites are in agreement to potentially sell or lease for this purpose, these sites will be included in the public consultation. Firstly, we note that private sites can be included for allocation, if available, similar to residential land promotions. The fact the landowners have promoted during the 'call for sites' would support their availability. Further information is requested from the Council.

¹ Section 5 of the GTANA

Technical Assessment

- 1.5 The purpose of this consultation is to consider whether the proposed allocated sites for gypsy and travellers are the best which could have been chosen; and whether the Council's choice is the most appropriate and, the Council having made the choice, whether its preferred sites are a sound allocation in planning terms.
 - 1.6 The consultation document identifies three Council sites² for gypsy and traveller pitches, despite the preference for private provision and potential availability of three private sites. Council owned provision includes land at Oak Grove Farm Crick; Bradbury Farm, Crick; and Langley Close, Magor. It is our position that Land at Langley Close, Magor should be removed as an allocation for gypsy and travellers, based on the findings presented below.
 - 1.7 Before undertaking our technical analysis, it is noted that land at Langley Close, Magor has been put forward as part of a wider Site for protection within the Monmouthshire emerging Local Plan, under references CSP021 and CSPO22. Should the allocation be secured, this proposed allocation would be contrary to that site protection. On this point, the emerging Local Plan should be aligned with the allocation of land for gypsy and travellers.
 - 1.8 Planning Policy Wales (February 2021) paragraph 4.2.35 requires the plan for gypsy and travellers to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Planning authorities are therefore required to demonstrate that sites are **suitable** for development and **deliverable** in the identified timescales, in accordance with Circular 005/2018.
 - 1.9 Paragraph 40 of the Circular refers to key guidance which must be considered in the site allocation process, with paragraph 41 stating that Sites, whether public or private, should be identified having regard to highways considerations. In setting their policies, planning authorities should also have regard to the potential for noise and other disturbance from the movement of vehicles to and from the site, the stationing of vehicles on the site, and on-site business activities. The requirements of paragraphs 40 and 41 are also referred to within the Welsh Government Guidance 'Designing Gypsy and Traveller Sites', dated May 2015. On this point, a Gypsy and Traveller site should not be located in areas which will have a detrimental effect on the general health and well-being of the residents.
 - 1.10 On the 29th of March 2019, the Council undertook a Gypsy and Traveller Member Workshop with the Adults Select committee. The workshop identified a 'site selection criteria' for the allocation process. For the Phase 1 stage - key criteria identified for the discounting of Sites included 'flood risk'; proximity to ecologically sensitive locations; allotments; capability of achieving a safe vehicle access; land contamination; and other hazards i.e. noise source.
 - 1.11 At an Adult Select Committee on the 21st of September 2021, there was an updated note on the criteria for the assessment of land, with access remaining a key requirement. The note state that a hazardous access that cannot be overcome is a deal breaker, with specific site tests later. We disagree with the approach that site specific tests should be later, as achieving a suitable access is essential for delivery. A position supported by many appeals for this type of development.
-

- 1.12 The most compelling planning argument against the allocation of Site, is the feasibility of achieving a safe and suitable access. On this point, Site access is proposed from St Bride's Road, which sits adjacent to the eastern site frontage and is subject to a speed limit of 60mph (NSL) with the exception of a small length of the site boundary approximately 15m to the southeast corner of the site where the speed limit is 20mph. Our expectation is that the existing field gate access to the southeast of the site will be brought forward as the proposed site access for the traveller site. Importantly, the Council have recognised that the existing Site access is not suitable.
- 1.13 Roadchef have appointed SLR Consulting (Highway Engineers) to provide an assessment on the suitability and feasibility of access. They have advised that whilst the gate sits within a 20mph zone, the visibility splay that is required as per MfS for a 20mph road (25m) extends beyond the posted speed limit signs for the 60mph speed limit zone to the left. As such DMRB standards for a 60mph road should be used to inform the visibility splays from the site access. In the case of a 60mph road DMRB requires a 215m visibility splay measured 2.4m back from the give-way line to the edge of the carriageway.
- 1.14 Given the location of the M4 overbridge, it is only possible to achieve a visibility splay of 86.5m to the left, which would require the loss of the entire mature hedgerow along the site frontage, whilst still providing inadequate visibility for those egressing the site. The loss of hedgerow would also remove essential screening to mitigate the presence of development, and has the potential to impact the ecological value of the Site.
- 1.15 It is therefore our position that the provision of an access along the site frontage represents a safety concern, given the inability to achieve appropriate visibility in line with design standards and will result in the loss of a considerable area of mature hedgerow. On this point, the access would also fail to provide easy access for Fire and Rescue services and ambulances; and also represents a health and safety risk.
- 1.16 Finally, in support of the above, we note that an appeal (reference APP/E6840/A/18/3213980) for the retention of material change of use of land to a one family traveller site, including the stationing of 1 caravan, day room, foul drainage, fencing and access driveway was dismissed by an Inspector on a failure to achieve suitability visibility splays and highway impact, despite a shortfall in supply. As such the Site should have been discounted on this ground, during the initial rounds of consultation.
- 1.17 Our client, is also concerned with the site's noise environment, given the presence of the M4 to the north (approx. 40 metres). The M4 is the main route in and out of the country for over 70% of the country's population and economy³. Roadchef operates a motorway service area (Magor Services, Junction 23a M4) to the north of the Site which serves the M4.
- 1.18 In economic terms, the M4 Corridor facilitates the movements of goods and people between Wales and the rest of the UK, enabling firms in South Wales to access domestic and international markets. The M4 is the most heavily used transport link between the main urban centres in the Severn Estuary of Swansea, Bridgend, Cardiff, Newport and Bristol.
- 1.19 The proximity of the M4 and presence of traffic would make it unsuitable for accommodation for gypsies and travellers. We note that the Council have not commissioned a Noise Assessment and/or Air Quality Assessment. As such, we draw reference to other evidence available at a local level.

³ Welsh Government M4 Corridor around Newport – Wider Economic Impact Assessment (March 2016)

- 1.20 Regarding 'noise impact' reference is drawn to application DM/2019/01937 for housing development at Land at Vinegar Hill, which occupies a similar location to Langley Close, Magor to the south, but adjoining the M4 corridor. Firstly, it is important to note that this proposal was for residential development of a substantial construction⁴ and therefore, differs to the construction of caravans, which are more susceptible to noise.
- 1.21 Reference is made to the Noise Assessment prepared by Hunter Acoustics, and submitted in support of the application, and discharge of conditions. We note that the report confirmed that properties would potentially experience noise impact and thus required mitigation - to ensure adequate protection against noise, referring to TAN11. Mitigation included sound insulation measures, to enable ventilation without the opening windows; uprated thermal double glazing and mechanical acoustical ventilation; and where MVHR is used - the system should be designed to ensure that inlet and discharge ducts/grilles do not face the M4 Motorway. Assessments also noted that if there is a risk of overheating on any of the facades, requiring windows to be opened more frequently, a more detailed assessment would be required.
- 1.22 We note that the above mitigation measures could not be secured on caravan provision, given their construction, with the website Extrium.co.uk⁵ for Wales confirming that the Site experiences 70-74.9dB during the day and 60dB during the night, from road traffic. As such, it is evident that the location for this type of accommodation is unsuitable and represents a health and safety risk for future occupants, due to impact of noise from the M4 to the north, which is likely to be more substantial, due to limited use of mitigation measures.
- 1.23 Another health and safety risk, is the impact of air pollution from the M4 to the north. Current Welsh Government policy (which is also specified in Planning Policy Wales) on Air Quality is that the air quality objective levels are not safe levels of pollution, and that exposure should be kept as low as possible. Exposure can still carry long-term population health risks. Nitrogen dioxide and particulate matter (PM10 and PM2.5) (the main pollutants of concern from vehicle emissions) have no safe threshold defined and therefore the lower the concentrations of those pollutants, the lower the risk of adverse health effects. Consideration should be given to the impact of air quality, on the health of future residents
- 1.24 Planning policy defines grades 1 to 3a as the 'best and most versatile' agricultural land. This is about 10 to 15% of the land in Wales. Planning applications and local development plans should include survey evidence when they cover grade 1, 2 or 3a land. Based on the Governments Agricultural Land Classification⁶ - the Site comprises Grade 3a land at the front of the Site where development would take place. We note that no survey has been provided by the Council to justify the loss of this land, especially as the land has been previous tenanted.
- 1.25 The Site is also visible from a Grade 2 listed building (Woodland House), consideration should be given on the impact of development on the character and setting of the asset.
- 1.26 The Site at over 5ha is also of substantial size. From our review of the GTANA the preference is for smaller sites for family units.
- 1.27 Finally, we are aware that the Council are in the process of undertaking a land contamination of Sites. We request to have oversight of the final documentation.

⁴ Construction of properties - brick and block external walls at 75mm cavity and 100mm block; and pitched tiled roof, timber trusses, plasterboard ceiling with 100mm mineral wool insulation.

⁵ <http://www.extrium.co.uk/walesnoiseviewer.html>

⁶ <https://www.gov.wales/agricultural-land-classification-predictive-map>

- 1.28 Having considered all the substantive planning arguments above, we consider that the allocation of Land at Langley Close Magor, unsound and should be removed. On this point, achieving a safe and suitable access is fundamental to the Site allocation process, as outlined in the site selection criteria and previous appeal decisions. Technical highway consultants SLR have confirmed that required visibility cannot be achieved. The allocation of the Site also represents a health and safety risk for caravans due to the impact from noise, and potential noise pollution. Other concerns identified relates to the lack of justification from the Council on the loss of best and most versatile land for agriculture; potential land contamination; and heritage impact.
- 1.29 To conclude it is also evident that there are alternative Sites which are can accommodate the proposed requirement of 11 pitches, and should be progressed over Langley Close, Magor, with further consultation required on the private Sites identified during the call for sites process. Ensuring no conflict with the emerging Local Plan is also a key consideration, especially if the land is allocated for protection, as promoted.



3276

Gwent Police

Archived: 12 March 2025 18:33:43

From: [REDACTED]

Sent: Fri, 15 Nov 2024 14:40:41

To: [MCC - PlanningPolicy](#)

Subject: Monmouthshire Replacement Local Development Plan (RLDP) 2018-2033 Deposit Plan Consultation

Importance: Normal

Sensitivity: None

Attachments:

[Outlook-ll4ephns.png](#) 

Hi good afternoon,

Please find comments regarding the RLDP for consideration and inclusion in the most relevant sections from a Designing Out Crime and Partnership approach;

Encourage the highest possible standards of design in all new developments to provide attractive, stimulating and safe places which to live and work and prevent potential risks to developments that would put people or property at risk ensuring that all new developments contribute to the aims of reducing crime, fear of crime and anti-social behaviour.

Areas where good design principles can impact on the safety and security of people and places. Are based on the concept of Crime Prevention Through Environmental Design (CPTED) and Secured By Design (SBD) principles: www.securedbydesign.com CPTED is founded on the belief that the built environment can influence the behaviour of persons within that space. These features may be physical or psychological, and their influence can stimulate both positive and negative behaviour. The key CPTED principles are intended to interlink and support each other to offer the greatest impact on ensuring the built environment assists in providing Community Safety. Relying on a single principle may be ineffective: 'Natural Surveillance alone will not suffice if not part of a package of measures'.

The CPTED principles are:

Access and Movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;

Structure: Places that are structured so that different uses do not cause conflict;

Surveillance: Places where all publicly accessible spaces are overlooked;

Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community;

Physical Protection: Places that include necessary, well-designed security features;

Activity: Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times;

Management and Maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

Places which are designed to be safe and secure in the first instance not only reduce the risk of being a victim of crime but have financial savings in terms of not needing to make costly alterations to improve safety and security. These later alterations such as fitting external shutters to doors and windows, cannot only undermine the aesthetic appearance of a development, but they also increase perceptions that an area is unsafe.

A place where potential crime and disorder risks have been addressed as part of the design process should not only be safer but can give its users a sense of well-being and control over their surroundings, enhancing the quality of life of our communities. Careful design is therefore not a solution to crime and disorder in itself but plays an important complementary role to initiatives that address the economic and social causes of crime.

Promoting good design and layout is one of the most important ways in which the Local Authority can address crime issues. Good designs and layouts make crime and disorder more difficult to commit, can increase the involvement of the community to prevent such activity, increase the likelihood of detection of criminal activity and improve public perceptions of safety. Attractive and well-designed environments also encourage a sense of pride and 'ownership' amongst the local community.

To promote and develop sustainable, socially cohesive communities by providing safe and secure access to community facilities, services, infrastructure, leisure and outdoor recreational opportunities accessible to all, as well as the protection and maintenance of such facilities. Useful resources for the creation and protection of green and play spaces can be found at:

[CPTED-in-Natural-Areas-Final-Draft-Feb-2018_web.pdf](#)

[Green Space Guidance](#)

[Community-Toolkit.pdf](#)

Creating vibrant and attractive neighbourhoods and centres serving the needs of residents and visitors utilising the Secure Design Homes Guide (aiming for SBD gold award): <https://www.securedbydesign.com/images/HOMES%20GUIDE%20May%202024.pdf>

Commercial guide: https://www.securedbydesign.com/images/COMMERCIAL_GUIDE_23.pdf.

There are additional guides available at the website [Secured by Design - Design Guides](#). Please contact the Designing Out Crime Officers via email: DOCO@Gwent.Police.Uk

SBD initiative including ParkMark, safer car parks initiative which is supported by the Association of Chief Police Officers and backed by the Home Office Crime Reduction Unit have endorsed by this guidance. SBD embraces the idea that good design and physical security plays a vital role in the creation of safe and attractive places to live and work. Developers are encouraged to apply for SBD and the ParkMark awards. There are various design guides available: [Secured by Design - Design Guides](#) for a safe and sustainable development.

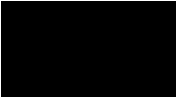
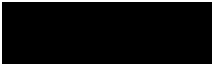
Including the Protect Duty legislation relating to Martyr's Law will keep people safe, enhancing our national security and reduce the risk to the public from terrorism by the protection of publicly accessible locations. 'do do do' Further information is available [ProtectUK | Home](#)

Encouraging existing and new residential areas to embrace the Nationally recognised Neighbourhood Watch Scheme www.ourwatch.org.uk encouraging residents to look out for one another and building community spirit and cohesion.

Consider the impact of new developments on policing and resources to be proportionate to the size and nature of the purpose of the development and where there is a need to increase of officer resources and the associated infrastructure such as; holding community surgeries/talks, ANPR cameras and being able to charge electrical vehicles to be able to respond to incidents. Developer contributions could be sought under Community Infrastructure Levy (CIL) and 'Section 106' to secure financial and non-financial contributions to mitigate the impact of the development. Please contact the Funding & Partnerships Lead via email FundingQueries@Gwent.Police.Uk

I hope this information is helpful.

Kind regards



Arweinydd Cyllido a Phartneriaeth | Funding and Partnerships Lead

Gwelliant Parhaus | Continuous Improvement

Mae fy nghyfeiriad e-bost yn newid

Mae fy nghyfeiriad e-bost yn newid ac ni fydd yn cynnwys .pnn mwyach.

Er mwyn sicrhau fy mod yn derbyn negeseuon yn y dyfodol, newidiwch fy nghyfeiriad e-bost gan ddilyn yr enghraifft ganlynol:

My email address is changing

In the near future, my email address is changing and will no longer include .pnn.

To make sure that I receive future emails, please update my contact email address using the following example:

Rydym yn croesawu gohebiaeth yn y Gymraeg a byddwn yn ateb yn y Gymraeg. Os hoffech dderbyn gohebiaeth o hyn ymlaen yn y Gymraeg neu os ydych wedi cael eich gwahodd i gyfweiliad neu gyfarfod a hoffiwch ddefnyddio'r Gymraeg, danfonwch e-bost at: cymraeg@gwent.police.uk. Darperir gwasanaethau cyfieithu.

We welcome correspondence in Welsh and will reply in Welsh. If you would like to receive future correspondence in Welsh or if you have been invited to an interview or meeting and would like to use the Welsh Language, please email: welsh@gwent.police.uk. Translation services are available.

Heddlu Gwent. Mae'r wybodaeth yn yr ohebiaeth hon ar gyfer yr unigolyn neu'r sefydliad y'i cyfeiriwyd ato. Os derbyniwch hwn mewn camgymeriad, dywedwch wrthym a'i ddifâ. Gall datgelu neu ddefnyddio gwybodaeth o'r fath fod yn weithred anaddas, ac yn groes i ddeddfwriaeth neu gyfrinachedd.

Gwent Police. The information contained in this correspondence is intended only for the named person or organisation to whom it is addressed. If you have received it in error please notify us and destroy it. Unauthorised disclosure or use of such information may be inappropriate, in breach of legislation or confidentiality.

3454

Chepstow Society

[View results](#)

Respondent

318

Anonymous

462:54

Time to complete

Part 1: Contact Details

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

1. Title *

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.

*

Introduction

Broadly, the Society supports the aims of this development plan, in terms of the provision of additional housing in the county, and in particular the carbon neutral standards to which they are to be built. However, there are three main issues that we would like to raise.

Economy

In the plan documentation, Key Issues include "High levels of out commuting" and "Ageing population and absence of 20-40 year olds". Under Goals, support for economic prosperity describes a supportive policy framework for "agricultural, tourism and retail economies". We can see no mention of industry, let alone technology industry.

There is a long tradition of technology industries in Monmouthshire and South Wales, and in Chepstow particularly. This includes Mitel Telecom in Caldicot in the 1980's and the spin off telecommunications and digital technology companies that were spawned out of it, such as Enigma and Interconnect Communications, both in Chepstow. There are now a number of Medical Technology companies in the area.

These are vital sectors for the growth and development of the economy of the county and for attracting and maintaining that missing demographic. This should be explicitly recognised, and actively promoted and encouraged through a targeted policy framework.

It is particularly unfortunate that the RLDP appears to rehearse this limited view of the Monmouthshire economy when the county's own Economic Strategy identifies the diverse nature of the economy with a key role for manufacturing and innovative technology (<https://www.monmouthshire.gov.uk/app/uploads/2024/02/EES-strategy-document-22-Jan-2024-New-1.pdf>

The same strategy notes that the level of out-commuting is balanced by an almost equivalent level of in-commuting.

The RLDP is underselling the strength of the Monmouthshire economy and is therefore lacking in ambition for our economic future.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

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

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

*

Affordable Housing

Affordable Housing is a laudable aim. However, we would want to be assured that affordable housing remains accessible and affordable to that community sector and does not transform to unaffordable by being sold off. This is very common when property is initially sold at below market rates. It is also not clear from the plan if there is any provision for affordable rental property in the plan, which is an important component of affordable housing.

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

16. 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)

17. 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)

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. Would you like to comment on this question *

☒ Yes

☐ No

20. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Infrastructure

New housing is all very well, but it requires supporting infrastructure. Chepstow has seen multiple housing developments over the decades, the latest being the rejuvenation of the old shipyards, which alone has resulted in the construction of 345 houses. The urban design of this development is to be commended, and its inhabitants are adding to the vitality of the town centre. However, whilst historically each of these plans has considered the impact on the factors described below as to have been small, the cumulative impact has not. It would appear that this development plan is again following this line of the individual impact being small, without any consideration of the accumulative effect.

Roads

The road system in Chepstow was last upgraded in the 1980's with the construction of a new road bridge across the Wye. Whilst providing considerable relief to the old bridge and the narrow streets of Lower Chepstow, this has resulted in a very busy, high traffic A road passing through the middle of the town, dividing it from Bulwark, and which is subject to congestion almost every day in the morning and evening rush hours. There are often traffic incidents that result in exacerbated congestion, a recent one of which resulted in drivers abandoning their cars in the Tesco car park for several hours.

This A road has a significantly negative impact on the town centre of Chepstow, separating the shops there from Tesco and its car park, rendering linked journeys that include footfall in the town extremely unlikely. It also forms a major barrier to foot or bicycle traffic into the town from Bulwark.

There has been no upgrading or improvement of capacity to cater for the additional housing developments in Lower Chepstow, or the St Lawrence sites, whilst the road carries increasing amounts of traffic coming through the town from new developments on the Gloucester side of the river. On the last point it is not clear what consideration, if any, the plan takes of housing developments immediately on the other side of the Wye in Sedbury and Tutshill, or Beachley. These areas are in practice part of Chepstow, if not politically or administratively.

Improvements to the road system are required, and to state that the percentage changes for the latest proposed development are small is not good enough. Improvements need to be planned and implemented in advance of development.

We note that the Welsh Government is currently undertaking a study of how congestion might be reduced on the High Beech roundabout. There is scope for specific improvements to the roundabout and safe Active Travel routes across the roundabout are necessary for the proposed new development. Significantly more radical change will be necessary if the Government in England presses forward its intention for rapid population growth in the Forest of Dean, as noted above.

Health

Chepstow's GP surgeries and dentists are overloaded. They cannot cope with the demand made of them now. It is almost impossible to get a doctor's appointment except in critical situations, and this is getting worse. There is no A&E and no Minor Injuries Unit. No changes have taken place to accommodate the new construction on the Shipyard site. No changes are considered in this plan.

Our discussions during the consultation session in Chepstow elicited the response that the "Health Board was considering the situation". This is not good enough, the development plan needs to be strategic in its scope and consider all related issues holistically.

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)

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. 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)

24. Would you like to comment on this question *

☒ Yes

☐ No

25. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Economy

In the plan documentation, Key Issues include "High levels of out commuting" and "Ageing population and absence of 20-40 year olds". Under Goals, support for economic prosperity describes a supportive policy framework for "agricultural, tourism and retail economies". We can see no mention of industry, let alone technology industry.

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The same strategy notes that the level of out-commuting is balanced by an almost equivalent level of in-commuting.

The RLDP is underselling the strength of the Monmouthshire economy and is therefore lacking in ambition for our economic future.

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

27. Would you like to comment on this question *

☐ Yes

☒ No

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

28. 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)

29. 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)

30. 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)

31. Would you like to comment on this question *

☐ Yes

☒ No

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

32. Would you like to comment on this question *

☐ Yes

☒ No

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

33. Would you like to comment on this question *

☒ Yes

☐ No

34. Is your representation in support or objection? *

☐ Support

☒ Objection

35. 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.

*

Summary

In summary, we feel that there is a significant deficiency in terms of providing an overarching strategy, within which the housing development plan for Chepstow needs to fit, and which addresses all the collateral and consequent issues of this proposal, as well as the cumulative impact of other recent housing developments within the area, and existing and future developments in the Forest of Dean.

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>

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

☐ Yes

☒ No

37. 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)?

38. 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): *

Summary

In summary, we feel that there is a significant deficiency in terms of providing an overarching strategy, within which the housing development plan for Chepstow needs to fit, and which addresses all the collateral and consequent issues of this proposal, as well as the cumulative impact of other recent housing developments within the area, and existing and future developments in the Forest of Dean.

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.

39. 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

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

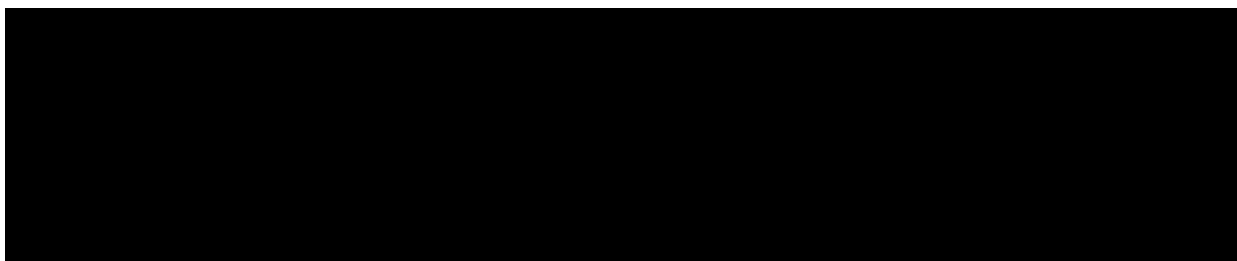
☐ Welsh

☒ English

Part 5: Welsh Language

41. 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?

42. 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?



3506

Sport Wales - Miss Alison McCann

View results

Respondent

606

Anonymous

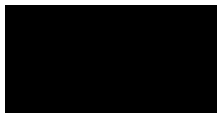
70:26

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

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

15. 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)**

16. Would you like to comment on this question *

☐ Yes

☒ No

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

17. 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)

18. Would you like to comment on this question *

☐ Yes

☒ No

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

19. Would you like to comment on this question *

☐ Yes

☒ No

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

20. 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)**

21. 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)**

22. 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)**

23. Would you like to comment on this question *

☒ Yes

☐ No

24. Is your representation in support or objection? *

☒ Support

☐ Objection

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

"The Deposit Plan contains numerous protection policies that will address Monmouthshire's 'Nature Emergency' by protecting and enhancing Monmouthshire's special and unique spaces, landscapes and biodiversity".

We draw particular attention to the need to protect existing playing fields and also ensuring that Standards on the quantity, quality and accessibility of sports pitches and sports facilities as part of new residential developments are set out in the RLDP taking into account local need - to achieve the vision around health and wellbeing and active lifestyles. Noting only small areas of play areas and not sports facilities are so far noted on the indicative masterplans.

**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?

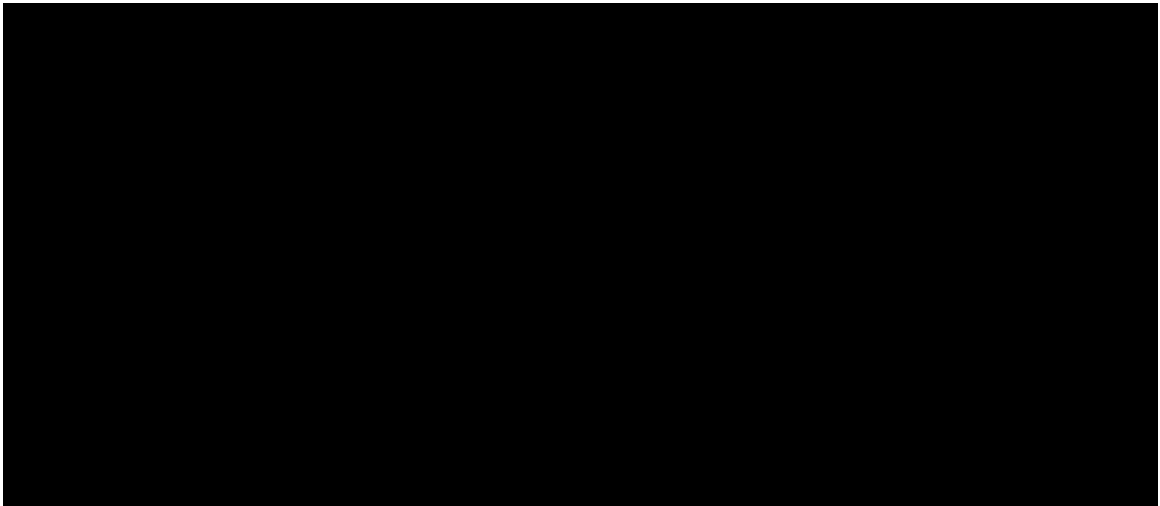
☐ Yes

☒ 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?



3591

Monmouth Town Council

[View results](#)

Respondent

327

Anonymous

13:00

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)

Monmouth Town Council

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.

*

HA4 Land at Leasbrook, Monmouth.

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

11. Would you like to comment on this question *

☐ Yes

☒ No

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

12. Would you like to comment on this question *

☐ Yes

☒ No

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

13. Would you like to comment on this question *

☐ Yes

☒ No

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☐ Yes

☒ No

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

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26. Would you like to comment on this question *

☐ Yes

☒ No

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

27. Would you like to comment on this question *

☐ Yes

☒ No

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): *

n/a

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?

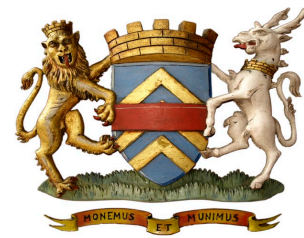
33. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010. You are not obliged to complete these questions and can select 'prefer not to say'.

MONMOUTH TOWN COUNCIL

Shire Hall
Agincourt Square
Monmouth
NP25 3DY



Response from Monmouth Town Council to the Monmouthshire Replacement Local Development Plan Consultation. Dated 16th December 2024.

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

Whilst Councillors agreed that there is a need for affordable housing in Monmouth there was uncertainty regarding the suitability of the HA4 Land as Leasbrook, Monmouth site.

The concerns are as follows:

The potential increase in traffic congestion and subsequent air pollution: The lack of public transport or Active Travel links means that there is a potential for a significant increase in traffic congestion as well as air pollution in an already built-up area. Councillors agreed that currently the Dixon Road roundabout and dual carriageway is regularly congested at peak times (9am and 3pm) and therefore would not recommend siting additional houses in the area which would subsequently bring more cars into Monmouth.

There are strong concerns amongst Councillors that the increase in cars to the area will bring negative impacts on local air quality, with many citing that the Local Air Quality Management (LAQM) document associated with the RLDP only monitors for one pollutant, nitrogen dioxide, when there are many other air pollutants that should be and need to be screened for. As so little is known about the air quality already many Councillors are disappointed to see that not much research has been done about the future impact the housing development will have and the subsequent potential decline in air quality that so many extra vehicles will bring to an already congested area.

The potential decline in drinking water quality: Councillors raised concerns that the location of the HA4 site was 400 metres upstream of the Wyesham Welsh Water Treatment Works (WWTW) which serves the whole of Monmouth with drinking water. There were concerns that any runoff pollution from the site will flow into the River Wye which already suffers from severe pollution and failing phosphate targets.

Councillors were minded that there are already 2 notices from the Drinking Water Inspectorate as follows: Risk of cryptosporidium breakthrough through existing treatment processes into final water (potential for elevated levels of cryptosporidium due to its presence in raw water) and the potential risks from taste, odour, pesticides, pollutions. The Drinking Water Inspector has mandated two upgrades to Monmouth (Mayhill) WWTW which are not due to be completed until March 2028 and will not be signed off until sufficient monitoring has taken place after installation, which could not be until March 2030. Concerns were raised as to how the scheduled development will fit into the planned upgrade to the WWTW and whether this addition of housing will negatively impact the water quality in Monmouth further.

The negative impact on the environment in which it would sit: Councillors were minded that the site is within the sightlines within the Core Sustenance Zone of the bats that are roosting within the Site of Special Scientific Interest (SSSI) at Newton Court. There was real concern that the site would disturb

the nearby roost which is home to endangered Greater Horseshoe bats and is one of only 3 sites in Wales where they can be observed. The site would also be visible and very close to the Wye Valley National Landscapes site (previously Area of Outstanding Natural Beauty (AONB)). The site would also result in the loss of arable agricultural land.

The site would sit nearby a Scheduled Ancient Monument (SAM): Councillors were concerned that the site would sit within 1km of SAM Dixon Mound. There was real concern for the sensitivity of the landscape and the real potential for loss or destruction of archaeological remains.

Extensive local objections: Councillors have discussed the HA4 with local residents and have also been present at local focus groups, namely the Gateway for Wales Action Group. The majority of residents spoken to have extensive objections to the HA4 site as it will bring many negative impacts not just to residents but to the wider landscape and wildlife.

Lack of employment nearby: Councillors agreed that there was a serious lack of employment land near to the HA4 site which in turn would encourage more residents into cars as currently there is a lack of sufficient public transport provision in the area to allow residents to commute to bigger cities for work, such as Cardiff or Bristol on a regular basis or timely manner.

Candidate site CS704 Land at Wonastow Road

Due to the above concerns regarding HA4 but still noting the need for additional housing in Monmouth, Councillors discussed the candidate site CS074 Land at Wonastow Road, which has been dismissed by Monmouthshire County Council as a candidate site for the RLDP. Councillors felt that the aforementioned candidate site CS704 would be more suitable as a development and cited the following reasons for this:

The proximity to National Cycle trails and Active Travel routes: Councillors felt that the close proximity to National Cycle trails and Active Travel Routes would encourage residents to walk or cycle for retail and work purposes, therefore, mitigating the potential increase in vehicular movements.

Close to employment and retail infrastructure: Councillors agreed that the CS704 site gave residents more opportunity to stay in Monmouth for leisure (retail) and work (nearby Wonastow Industrial Estate) purposes. This would, again, reduce the need to travel outside of Monmouth for work and leisure and would mitigate the potential increase in vehicular movements.

In-keeping with surrounding developments: Councillors felt that the CS704 would be in-keeping with the surrounding developments and infrastructure nearby, namely Rockfield Estate and Kingswood Gate Estate.

Downstream of the WWTW: It was noted that as the CS704 site was downstream of the WWTW it would be less likely to have a negative impact on drinking water quality and would also reduce the likelihood of residents consuming below standard drinking water.

Overall Councillors welcomed more affordable housing in Monmouth, however, they agreed that the CS704 Land at Wonastow Road site was a significantly better suited over the proposed HA7 Land at Drewen Farm, for the reasons mentioned above.

Councillors would also like to make clear that although the HA4 Land at Leasbrook caters for affordable housing there was concerns about the overall negative impact on the environment, water quality, pollution levels and wildlife in the area.

Archived: 08 March 2025 15:41:10

From: [MCC - Planning](#)

Sent: Mon, 16 Dec 2024 16:59:47

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

Subject: FW: Monmouth Town Council - Response to RLDP - Dated 16/12/2024

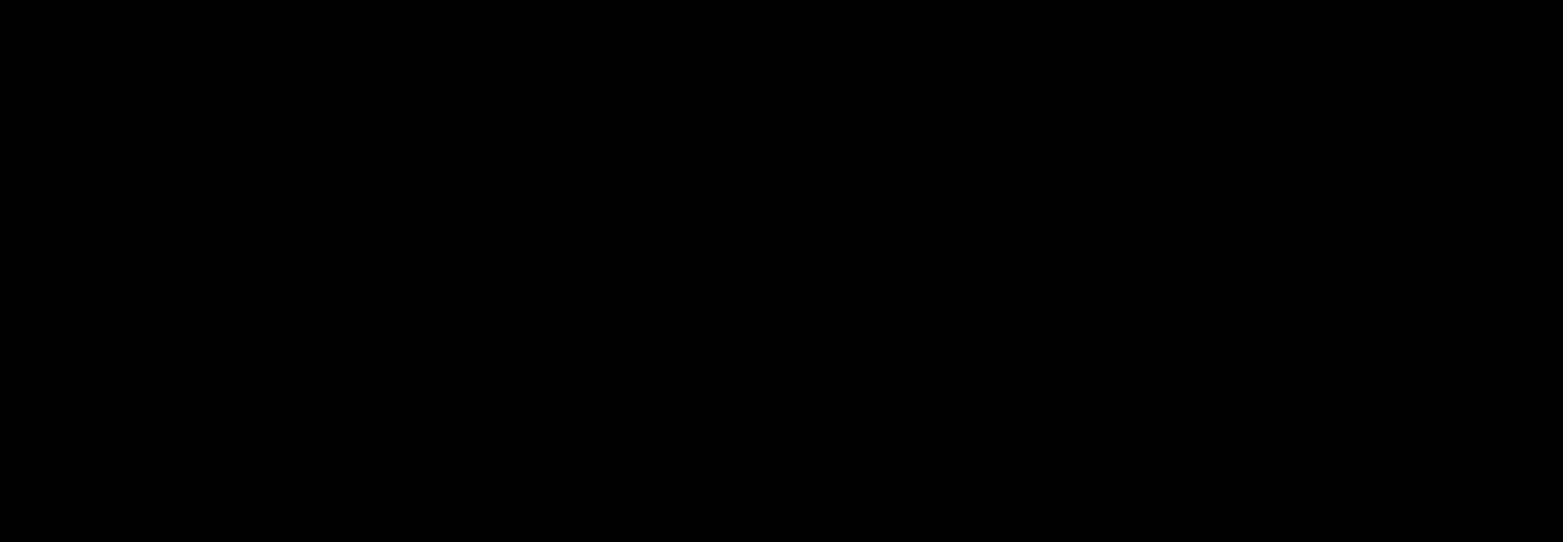
Importance: High

Sensitivity: None

Attachments:

[MTC RLDP Response 16.12.2024.pdf](#) 

FYI



High

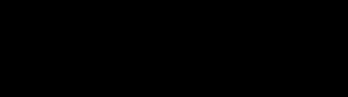
Good afternoon

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The reason we have chosen to respond via email is due to the limited word count on the Word Forms Survey via your website.

If you would prefer the response in an alternative format please let me know.

Kind regards



Monmouth Town Council
Shire Hall
Agincourt Square
Monmouth
NP25 3DY
townclerk@monmouth.gov.uk

Tel : [REDACTED]

The Town Council Office (within the Shire Hall), is open to the public between the hours of 11:00 a.m. – 3:00 p.m. on Mondays, Tuesdays and Fridays.

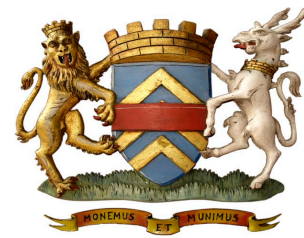
Please note that I do not work on Wednesdays and that I work from home on Thursdays.

When you contact us the information you provide, (personal such as name, address, email address, phone number, organization), will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will not be shared or provided to any other third party. Your information may however be published in the public domain if you require the Council to discuss the matter raised.

For further information please see our full Privacy Notice on our website at www.monmouth.gov.uk

MONMOUTH TOWN COUNCIL

Shire Hall
Agincourt Square
Monmouth
NP25 3DY



Tel: [REDACTED]

Email: [REDACTED]

www.monmouth.gov.uk

Response from Monmouth Town Council to the Monmouthshire Replacement Local Development Plan Consultation. Dated 16th December 2024.

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Overall Councillors welcomed more affordable housing in Monmouth, however, they agreed that the CS704 Land at Wonastow Road site was a significantly better suited over the proposed HA7 Land at Drewen Farm, for the reasons mentioned above.

Councillors would also like to make clear that although the HA4 Land at Leasbrook caters for affordable housing there was concerns about the overall negative impact on the environment, water quality, pollution levels and wildlife in the area.

Archived: 14 March 2025 14:57:20

From: [MCC - Planning](#)

Sent: Mon, 16 Dec 2024 16:59:47

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

Subject: FW: Monmouth Town Council - Response to RLDP - Dated 16/12/2024

Importance: High

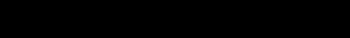
Sensitivity: None

Attachments:

[MTC RLDP Response 16.12.2024.pdf](#) 

FYI

From: Monmouth Admin <townclerk@monmouth.gov.uk>

Sent: 



Importance: High

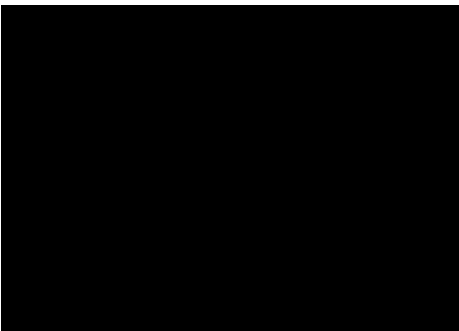
Good afternoon

Please see attached Monmouth Town Council's response to the Replacement Local Development Plan for Monmouthshire, specifically in response to *Question 17 Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)*.

The reason we have chosen to respond via email is due to the limited word count on the Word Forms Survey via your website.

If you would prefer the response in an alternative format please let me know.

Kind regards



Tel : 01600 732722

The Town Council Office (within the Shire Hall), is open to the public between the hours of 11:00 a.m. – 3:00 p.m. on Mondays, Tuesdays and Fridays.

Please note that I do not work on Wednesdays and that I work from home on Thursdays.

When you contact us the information you provide, (personal such as name, address, email address, phone number, organization), will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will not be shared or provided to any other third party. Your information may however be published in the public domain if you require the Council to discuss the matter raised.

For further information please see our full Privacy Notice on our website at www.monmouth.gov.uk

View results

Respondent

429

Anonymous

19:34

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)

Monmouth Town Council

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.

*

Overall Councillors welcomed more affordable housing in Monmouth, however, they agreed that CS704 Land at Wonastow Road was a significantly better site over the proposed HA7 Land at Drewen Farm, for the reasons mentioned in Question 19. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18).

Councillors would also like to make clear that although the HA4 Land at Leasbrook caters for affordable housing there was concerns about the overall negative impact on the environment, water quality, pollution levels and wildlife in the area.

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

20. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Sepearate email sent to planning@monmouthshire.gov.uk due to word restriction.

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

22. Would you like to comment on this question *

☐ Yes

☒ No

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

23. Would you like to comment on this question *

☐ Yes

☒ No

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

24. Would you like to comment on this question *

☐ Yes

☒ No

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

25. Would you like to comment on this question *

☐ Yes

☒ No

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

26. 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)

27. 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)

28. 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?

29. Would you like to comment on this question *

☐ Yes

☒ No

Part 3: Tests of Soundness

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

30. 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.

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

☒ Yes

☐ No

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

☐ Welsh

☒ English

Part 5: Welsh Language

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

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

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.

You are not obliged to complete these questions and can select 'prefer not to say'.

3602

Llanbadoc Community Council

View results

Respondent

622

Anonymous

266:56

Time to complete

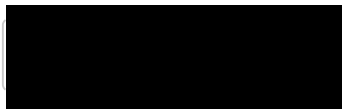
Part 1: Contact Details

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.

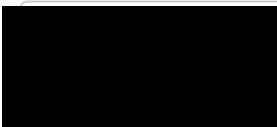
1. Title *



2. Name *



3. Job Title (where relevant)



4. Organisation (where relevant)

Llanbadoc Community Council

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.

*

The Llanbadoc Community Council councillors representing the ward of Little Mill have held a review of the RLDP and have raised the following comments:

While the plan sets out strict and clear policies that must be met by each development to meet the target for Net Zero, these policies are deemed ambitious given the infrastructure available in the area.

The RLDP does not provide any options to allow plans submitted to deviate from implementing these strict policies should the Net Zero target be moved.

The councillors are requesting further details to be provided and included in the RLDP to make it more deliverable.

For example, make more options available for specific Net Zero target constraints applied to developments providing a more flexible approach to the RLDP delivery.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Following informal discussions with Llanbadoc Community Councillors, in particular the councillors from Little Mill Ward, for which village this RLDP affects the Llanbadoc Community Council, it has been raised that the following statement in the strategy does not apply to Little Mill:

The focus of this growth will be on the County's most sustainable settlements.

Little Mill is a village made up predominantly of homes so cannot be classified as a sustainable settlement when compared to other areas yet is currently being subjected to 2 new multiple dwelling site proposals under the RLDP.

Little Mill Ward Councillors have raised concerns on the proposed further expansion of the settlement with more dwellings proposing to be built on the current settlement boundary, will compound the issue of sustainability of the village, due to the current severe lack of amenities to support the current developments and community in the area without consideration and implementation of significant improvements to the village's infrastructure.

The public transport links to local towns are already insufficient to sustain the village, let alone further expansion of homes, bringing more people and children into the village with nothing here to support them. There is no local shop, currently no village pub and the village hall is not used by residents as an amenity. All residents must travel outside the village to neighbouring towns for everything they need, or resort to deliveries which are costly and may have a negative impact on the environment.

Given the current situation with lack of infrastructure and amenities in Little Mill, it is the view of the LCC Little Mill Ward Councillors, that the RLDP needs to take into consideration that there is already a large future proposed development in the neighbouring county of Torfaen, which will likely greatly reduce the need for the proposed expansion in Little Mill included in the current RLDP.

Less than 1 mile away from Little Mill, at the Mamhilad Park Estate, local planning there is set to deliver > 1000 new dwellings, including a vast number of affordable homes and new amenities such as, but not limited to, a GP surgery and a School, which will be within a perfectly reasonable locality of Little Mill for people who wish to live in Little Mill to consider. This development will certainly negate the requirement to build any more poorly served dwellings in Little Mill, and likely sufficiently provide the much needed affordable houses for some bordering residents.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

Llanbadoc Community Council Little Mill Ward councillors view the Policy S2 as ambitious as it doesn't provide any options for developers should proposed developments not meet the criteria set by this policy. The Llanbadoc Community Council Little Mill Ward councillors have provided comments regarding the allocation of the site which is deemed a continuation of the Adopted LDP allocation. The site (Ref: HA16) is unable to meet to meet the policy S2. Namely: HA16 does not lend itself to the Climate and Nature Emergency policy set out in the Spatial strategy. The dwellings in the HA16 plan will not be carbon zero homes and therefore councillors have noted concerns raised by local villagers which state the approved plan is outdated and calls for this planning application to be revised if it is to be in line with this RLDP and it's policies under consultation. The second site (Ref: HA15) is currently at outline planning stage, and therefore will likely be forced to meet the requirements of this RLDP policy S2, should it be progressed to the next stage of the planning process in the future. Site HA15 could provide councillors and villagers sufficient time and opportunity to ensure that the development meets the requirements set out in the RLDP Policy S2, and ensures it meets the needs of the community and surrounding environment and habitat through the provision of infrastructure and the necessary planning process, required scrutiny and possible much needed related S106 contributions.

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

17. Would you like to comment on this question *

- ☒ Yes
- ☐ No

18. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

The LCC Little Mill Ward Councillors have collected comments from residents and provide these comments below regarding the current plan for approved development HA16 being carried over for inclusion into the RLDP for future development.

1. Site Ref: HA16 included in the RLDP does not tend to meet all the criteria for Policy OC1, namely:

d) the development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity, dark skies and local amenity value.

Comments provided by residents taken forward by ward councillors include:

Little Mill is seen as a village of great historic value by its residents. For particular consideration is the large site at the most northerly point of Little Mill named Ty Draw, which was converted into one of Monmouthshire's first Reformatory Schools around 1810.

The whole site of Ty Draw can be seen from the public walkways and footpaths that surround the site, which are in constant use by dog walkers and ramblers who take advantage of the landscape and breathtaking views. Some visitors to the site say they had family who were housed there when it was an active Reformatory. These views of the site from other parts of the village and surrounding footpaths and walkways will no doubt be greatly adversely impacted by the proposed HA16 development of 15 homes, as the fielded area planned for this development directly in front of the Ty Draw site between Ty Draw and the village itself.

The LCC Little Mill Ward Councillors have attempted to review the reasons that the other candidate sites in the village were turned down, which were put forward but didn't pass through the 3rd stage of assessment, because these alternative sites would have possibly met this part of the policy and been more suitable, but councillors have been unable to locate any evidence of reasons as to why these sites were turned down.

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

20. Would you like to comment on this question *

☒ Yes

☐ No

21. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

The LCC Little Mill Ward Councillors provide comments regarding the current plan for approved development HA16 being carried over for inclusion into the RLDP for future development.

iii) Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings;

Given the current situation with lack of infrastructure and amenities in Little Mill, it is the view of the LCC Little Mill Ward Councillors, that the RLDP needs to take into consideration that there is already a large future proposed development in the neighbouring county of Torfaen, which will likely greatly reduce the need for the proposed expansion in Little Mill.

Less than 1 mile away from Little Mill, at the Mamhilad Park Estate, local planning there is set to deliver >1000 new dwellings, including a vast number of affordable homes and new amenities such as, but not limited to, a GP surgery and a School, which will be within a perfectly reasonable locality of Little Mill for people who wish to live in Little Mill to consider.

Any further development / expansion of Little Mill will certainly not incorporate a green infrastructure-led approach as set out by this policy.

Councillors are asking for considerations to be taken into account particularly in Little Mill for these reasons.

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

23. Would you like to comment on this question *

☒ Yes

☐ No

24. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

The Llanbadoc Community Council Little Mill Ward councillors have provided comments regarding the inability for the current approved plan for development in Little Mill (Ref: HA16) being carried over for inclusion into this RLDP for future development to meet the policy S4.

Namely: HA16 does not currently meet the following section of the policy.

vii) Providing ultra-low emission vehicles charging infrastructure to reduce emissions and improve air quality; and

The dwellings in the HA16 plan will not be carbon zero homes and therefore councillors have noted concerns raised by local villagers which calls for this planning application to be revised if it is to be in line with the RLDP and it's policies under consultation.

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)

26. Would you like to comment on this question *

☒ Yes

☐ No

27. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

The Llanbadoc Community Council Little Mill Ward councillors have fielded comments from residents regarding the inability for the current approved plan for development in Little Mill (Ref: HA16) being carried over for inclusion into this RLDP and (HA15) future development to meet the policy S5.

In particular one section has been highlighted by residents again:

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;

Little Mill is seen as a village of great historic value and character by it's residents. For particular consideration is the large distinctive site at the most northerly point of Little Mill named Ty Draw, which was converted into one of Monmouthshire's first Reformatory Schools around 1810.

The whole site can be seen from the public walkways and footpaths that encompass the village, which are in constant use by dog walkers and ramblers who take advantage of the landscape and breathtaking views.

Some visitors to Ty Draw say they had family who were housed there when it was an active Reformatory.

These views of the site from other parts of the village and surrounding footpaths and walkways will no doubt be greatly adversely impacted by the development of 15 homes (Ref: HA16).

Llanbadoc Community Council Little Mill Ward councillors would like to see this development adopt the policies set out by this RLDP, otherwise this RLDP is not achievable.

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

29. Would you like to comment on this question *

☒ Yes

☐ No

30. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Councillors in Little Mill Ward have raised concerns that the current RLDP Strategic policy S6 - Infrastructure is vastly unachievable based on the proposed further expansion of the current Little Mill settlement with more dwellings proposing to be built on the current settlement boundary that will not meet these policy demands.

Any further development will compound the issue of sustainability of the village, due to the current severe lack of amenities to support the current developments and community in the area without consideration and implementation of significant improvements to the village's infrastructure.

The public transport links to local towns are already insufficient to sustain the village, let alone further expansion of homes, bringing more people and children into the village with nothing here to support them. There is no local shop, currently no village pub and the village hall is not used by residents as an amenity. All residents must travel outside the village to neighbouring towns for everything they need, or resort to deliveries which are costly and may have a negative impact on the environment.

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)

32. Would you like to comment on this question *

☒ Yes

☐ No

33. Is your representation in support or objection? *

☐ Support

☒ Objection

34. 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.

*

Councillors in Little Mill Ward have reviewed this section of the RLDP and would like to submit concerns that the current RLDP policy S7 – Affordable Housing is possibly unachievable based on the 50% rule set out by this policy being too high as a percentage so is deemed undesirable for developers to adopt as this affects the profit available.

This could affect the viability of this plan overall, unless different percentage options can be made available.

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

35. Would you like to comment on this question *

☐ Yes

☒ No

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

36. Would you like to comment on this question *

☐ Yes

☒ No

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

37. Would you like to comment on this question *

☐ Yes

☒ No

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

38. 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)**

39. 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)**

40. 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)**

41. 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)**

42. 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?**

43. Would you like to comment on this question *

☒ Yes

☐ No

44. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

The Llanbadoc Community Council would like to suggest this plan is revised to include more options if the strict policies included in this plan deem it to become undeliverable.

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>

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

☐ Yes

☒ No

47. 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)?

48. 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): *

Llanbadoc Community Council, Little Mill Ward Councillors do not truly understand how this plan fits or if it is compatible with the plans of neighbouring LPAs, due to the Affordable housing development being built by Torfaen CBC at Mamhilad Park Estate, nor does it really address the issues regarding lack of infrastructure to support more dwellings proposed for Little Mill under this RLDP.

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.

49. 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?

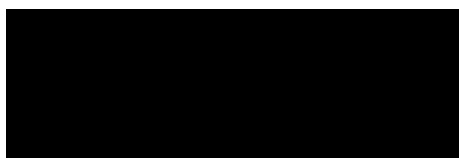
☐ Yes

☒ No

Part 5: Welsh Language

50. 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?

51. 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?



3630

Shirenewton Community Council

[View results](#)

Respondent
352 Anonymous

25:00
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.

*

The final plan relies on population projections which may not transform into reality. The latest birth rate statistics show a decline in the birth rate. This and external factors such as climate change, changing work practices and morbidity rates suggest the final plan is unlikely to deliver on its expectations, and should lean towards low growth and be capable of rapid review and adjustment. The final plan assumes that the desired number and mix of houses will be built by the private sector. That sector, like all business, exists by sustaining a level of profit that ensures its survival. Profit lies in building large houses where costs, including contributions to infrastructure, can more readily be recouped. Maintaining a shortfall of new housing creating market house price growth is in the interests of housebuilders, and this trumps any societal intention to provide housing for those who need it.

Whilst the final plan presents a laudable effort to set targets, it will not deliver on them. The historic and ongoing failure of national and local government to build council housing, and the infrastructure to support both it and market housebuilding, dictates that the need for housing will continue to rise, irrespective of future variations in the population.

It is for the UK and Welsh Governments to set the priorities.

Housebuilding by local authorities could be reinstated and funded by smaller, more efficient governments and the redirection of capital gains tax on development land sales. The final plan recognises the conundrum that our work force continues to haemorrhage skilled workers to employers outside Monmouthshire because of the lack of relevant employment opportunities locally, and the lack of those locally available skills coupled with inadequate transport and telecommunication infrastructure deters new employers. It offers no

solution, rather it makes the situation worse by supporting the proposed large scale developments at Caldicott, Portskewett and Chepstow. Worse still, it fails to protect the green belt north of the M4 despite Welsh Government planning policy.

If the final plan is to make a difference, it should call a halt to housing developments unless and until there is infrastructure to support it. That includes additional access onto the M4 and M48, bringing the Cardiff Metro to Chepstow, electricity and sewerage system rebuilding, and having gigabit broadband plus 5g phone for all.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)1. It lies outside the current defined village envelope. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. This site is part of that green belt and should remain for farming/agricultural use, and be excluded from the proposal to extend the current village development boundaries.

2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages . This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.

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

14. Would you like to comment on this question *

☒ Yes

☐ No

15. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)Heritage and Landscape. The RDLP candidate site submission asserts overall :
that the site performs well against the site search sequence. While the site is partly Best and Most Versatile (BMV) agricultural land, the RDLP asserts it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land, benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, is within walking distance of the primary school and meets key policy requirements, including 50% affordable housing and net zero carbon homes.

The assessment considers neither our heritage nor landscape. The core of Shirenewton is a conservation area and the proposed site is in view from it. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements.

A previously proposed candidate site which also lies to the west of the village but on the opposite side of the road is not progressing as significant concerns were raised in relation to heritage impact. Those should equally apply to this candidate site.

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

17. Would you like to comment on this question *

☐ Yes

☒ No

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

18. Would you like to comment on this question *

☒ Yes

☐ No

19. Is your representation in support or objection? *

☐ Support

☒ Objection

20. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles. Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.

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

21. Would you like to comment on this question *

☒ Yes

☐ No

22. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles. Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.

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)

24. Would you like to comment on this question *

- ☒ Yes
- ☐ No

25. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 The Infrastructure Delivery Plan states there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter.

Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

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

27. Would you like to comment on this question *

☒ Yes

☐ No

28. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS02325.1.

The Infrastructure Delivery Plan states there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter.

Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

5.2. We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

5.3. The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed limit for much of its length.

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

30. Would you like to comment on this question *

☒ Yes

☐ No

31. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS02325.1.

We have no connecting network of pavements in the village, so pedestrians are at significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

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

33. Would you like to comment on this question *

☒ Yes

☐ No

34. Is your representation in support or objection? *

☐ Support

☒ Objection

35. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS02325

2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages. This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households

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

36. Would you like to comment on this question *

☐ Yes

☒ No

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☐ Support

☒ Objection

39. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS02325

5.5. Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.

5.6. We have almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Only FTTC is available which limits broadband speed, and speeds in excess of 100mb/s inside houses are not available in the village. The service is overhead and prone to fluctuation in adverse weather. We are not aware of any BT plans to bring us superfast broadband within the time frame of the RDLP, which reduces the appeal of WFH and encourages continuing use of the roads.

5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles.

Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.

5.9. The Chepstow Beech Hill roundabout which is our link to the motorway network is already over congested and known for its poor air quality. Proposals for a Chepstow bypass for the A48 will not materialise until after 2033. The Land at Mounton Road Chepstow off the Beech Hill roundabout will add 146 houses with inevitable consequences to pollution and congestion.

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

40. 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)

41. Would you like to comment on this question *

☒ Yes

☐ No

42. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS023255.7. Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.

Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.

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

44. 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)

45. Would you like to comment on this question *

☒ Yes

☐ No

46. Is your representation in support or objection? *

☐ Support

☒ Objection

47. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS023255.

. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.

2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.

3. Car use is unavoidable and air pollution will inevitably rise.

4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.

5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village

6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.

7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards

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

48. Would you like to comment on this question *

☒ Yes

☐ No

49. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

50. 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.
*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS023255.

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

51. Would you like to comment on this question *

- ☒ Yes
- ☐ No

52. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

53. 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.

*

RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS023255.

In summary our objections are:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards

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>

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

☐ Yes

☒ No

55. 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)?

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

The final plan relies on population projections which may not transform into reality. The latest birth rate statistics show a decline in the birth rate. This and external factors such as climate change, changing work practices and morbidity rates suggest the final plan is unlikely to deliver on its expectations, and should lean towards low growth and be capable of rapid review and adjustment.

The final plan assumes that the desired number and mix of houses will be built by the private sector. That sector, like all business, exists by sustaining a level of profit that ensures its survival. Profit lies in building large houses where costs, including contributions to infrastructure, can more readily be recouped. Maintaining a shortfall of new housing creating market house price growth is in the interests of housebuilders, and this trumps any societal intention to provide housing for those who need it. Whilst the final plan presents a laudable effort to set targets, it will not deliver on them. The historic and ongoing failure of national and local government to build council housing, and the infrastructure to support both it and market housebuilding, dictates that the need for housing will continue to rise, irrespective of future variations in the population.

It is for the UK and Welsh Governments to set the priorities.

Housebuilding by local authorities could be reinstated and funded by smaller, more efficient governments and the redirection of capital gains tax on development land sales.

The final plan recognises the conundrum that our work force continues to haemorrhage skilled workers to employers outside Monmouthshire because of the lack of relevant employment opportunities locally, and the lack of those locally available skills coupled with inadequate transport and

telecommunication infrastructure deters new employers. It offers no

solution, rather it makes the situation worse by supporting the proposed large scale developments at Caldicott, Portskewett and Chepstow. Worse still, it fails to protect the green belt north of the M4 despite Welsh Government planning policy.

If the final plan is to make a difference, it should call a halt to housing developments unless and until there is infrastructure to support it. That includes additional access onto the M4 and M48, bringing the Cardiff Metro to Chepstow, electricity and sewerage system rebuilding, and having gigabit broadband plus 5g phone for all.

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.

57. 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

58. 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?

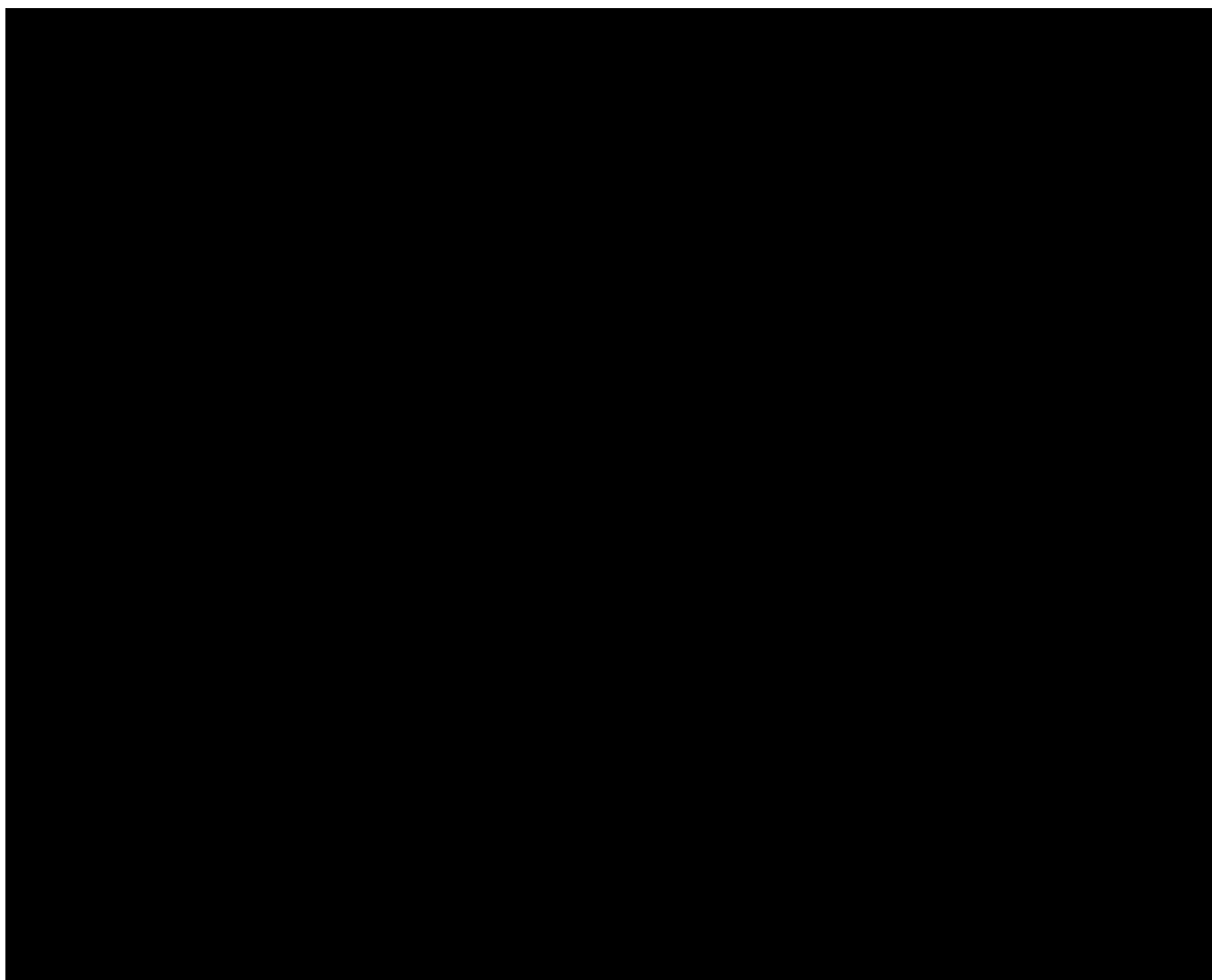
Its not relevant. People should have opporutnity to speak welsh if disired but it should not be pushing out English which is the most favoured language.

59. 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?

There is no requirement for an increase in using Welsh language, unless the People are requesting it. Any increase should be evidence based only. Not because of a policy.

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010. You are not obliged to complete these questions and can select 'prefer not to say'.



3902

Usk Civic Society

View results

Respondent

463

Anonymous

51:24

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.

*

Usk Civic Society objects to the RLDP on several grounds:

The excessive level of housing prediction is not justifiable: Growth Policy S1.

The 15% flexibility allowance is unjustified: also relating to Growth Policy S1.

That due diligence has not been followed so that the RLDP has not been correctly presented to the Members.

Site HA11 land east of Burrium Gate, Usk is not therefore essential for development.

Our objections are explained in the following sections.

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

11. Would you like to comment on this question *

☒ Yes

☐ No

12. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

Usk Civic Society (UCS) objects to the excessive level of housing growth and to the flexibility allowance that permits up to 15% extra houses.

Objection to Policy S1: The housing target of 5,400-6,210 homes over the Plan period 2018-2033 is excessive. It includes approximately 4,080 homes in the existing landbank, so that new sites are allocated for approximately 1,320-2,130 new homes. The Welsh Government letter of 27 August 2021 to MCC stated that the proposed level of housing growth should "be no greater than 4,275 units ... plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales." Mark Hand, MCC's Head of Placemaking, Regeneration, Highways and Flooding wrote to all MCC members on 22 September 2021 stating that the WG "letter's prescribed maximum of 4,275 homes plus 10% flexibility ... result in a Plan with no new housing allocations."

The fact that the housing figure in the Preferred Strategy, carried forward into the DRLDP, contains a higher figure of 5,400 which was acquiesced by WG in a later letter of 26 January 2023, does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales. Indeed, the later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the DRLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

Our objection to the target of 5,400-6210 homes is that if it were reduced to 4,275 homes it would remove the need for new housing allocations in Usk and the other secondary settlements of Raglan, Penperlleni and elsewhere. The allocated site for housing east of Burrium Gate in Usk is therefore unnecessary, and its environmental and sustainability harm could be avoided.

Building more homes than are necessary is environmentally irresponsible and undermines the need to conserve natural resources and protect global ecosystems to support health and wellbeing, now and in the future.

Also in Policy S1, the 15% flexibility allowance is unjustified: Justification for the 15% flexibility allowance is provided in the Housing Background Paper October 2024 and includes the statement at para 3.3 that "it ensures the strategic sites ... are sufficiently large..." and will "...result in the Plan being able to provide a range and choice of sites..." etc.

There is a high probability that over-allocation of sites would allow developers to cherry-pick sites, such that 1, more sites would be developed than are justified by an already excessive housing target, that 2, the most difficult to develop sites would be left till last, and that 3, the most marketable sites, in settlements such as Usk, will be developed first, adding to development pressures.

Regarding Soundness, UCS also objects to the way the DRLDP has been prepared. The Delivery Agreement which accompanied the consultation draft Preferred Strategy was agreed by MCC on 1 December 2022 and committed MCC to gain endorsement of the Preferred Strategy and its housing target before the DRLDP was prepared. This Delivery Agreement requirement was not complied with, as set down in Part 3 to this Representation Form.

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

14. Would you like to comment on this question *

☐ Yes

☒ No

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

15. Would you like to comment on this question *

☒ Yes

☐ No

16. Is your representation in support or objection? *

☐ Support

☒ Objection

17. 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.

*

UCS objects to the level of growth for secondary settlements in Policy S2 resulting from the excessive target and flexibility allowance in Policy S1.

UCS objects to Policy S2 regarding Usk: S2 is objected to because the figure of 350 new homes (already objected to as part of Policy S1) that is/are required to help meet the excessive 5,400-6,210 housing target, to be shared between Usk, Raglan, and Penperlleni as the three Secondary Settlements, is only 'indicative'.

The figure of 350 new homes is 'indicative,' and the figure is not apportioned between the three settlements, as referred to in para 6.4.4, which states that "Where growth cannot be met in an individual settlement, development will be directed toward a same tier or higher tier settlement within the same Housing Market Area." Because Usk, Raglan, and Penperlleni are in the same tier and implausibly within the Chepstow Housing Market Area, then if Raglan or Penperlleni have difficulties in accommodating their allocated level of housing growth, all or much of it could be redirected to Usk. The phrase in para 6.4.4 "towards a same tier" settlement is objected to and should be deleted.

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

18. Would you like to comment on this question *

☒ Yes

☐ No

19. Is your representation in support or objection? *

☐ Support

☒ Objection

20. 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.

*

Firstly, UCS refutes the assumption that residents in Burrium Gate (Phase II) would walk into Usk town when residents in Burrium Gate (Phase I) are reliant on cars for short distance travel, often travelling further to a wider range of facilities that are not provided in Usk Town. Reliance on cars diminishes local placemaking.

As Burrium Gate (Phase II) does not offer mixed use – only housing – Policy S3 is not being applied to help reduce travel. It is questionable what mixed use might be sustainable in this area which reinforces dependency on longer distance travel to access a range of services and amenities.

Secondly, whilst Welsh Water are working to reduce discharges of raw sewage and phosphates into the River Usk (Olway works concluding 2026/7), their record has not been exemplary in anticipating future needs or avoiding extremely high levels of pollution. Residents are distrustful of Welsh Water's ability to protect water purity in the river. Discharges may be moderated but will continue (Policy PM2 Water Pollution). The Save The River Usk campaign (STRU) reinforce the arguments by testing more thoroughly than Government Agencies. UCS supports STRU objections.

Thirdly, Welsh Water are redesigning Monmouth Road drainage for implementation early in 2025. This is a reactive approach rather than anticipating the problem and is necessary because former on-site sustainable urban drainage systems were inadequate for the recurrence of extreme weather conditions.

UCS advises that it would be difficult to deliver on these policies which would render the site unsuitable for development.

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

21. Would you like to comment on this question *

☒ Yes

☐ No

22. Is your representation in support or objection? *

☒ Support

☐ Objection

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

UCS supports the adoption of renewable energies leading to net-zero carbon homes. However, these add a cost premium to any development which needs to be factored into the cost viability of a site.

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

24. Would you like to comment on this question *

☒ Yes

☐ No

25. Is your representation in support or objection? *

☒ Support

☐ Objection

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

UCS supports the policy of green infrastructure and open space enhancement of new developments. However, these require sufficient area within a development and add a cost premium to any development which needs to be factored into the potential density and cost viability of a site. As the useable area of the Burrium Gate (Phase II) is diminished by the 40m ridgeline restriction (HA11), the high density of housing and hard landscaped area will significantly reduce the potential for amenity land or natural water absorption in an appropriate location on the site.

UCS therefore believes that the proposed density of HA11 Burrium Gate (Phase II) cannot provide sufficient green area within the lower part of the site to comply with these policies.

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

27. Would you like to comment on this question *

☒ Yes

☐ No

28. Is your representation in support or objection? *

☒ Support

☐ Objection

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

UCS supports the policy of providing a high proportion of affordable housing in any new development.

USC is mindful of the cost burden this places on development and that reliance on private developers to fund the entire project has not previously delivered on the high proportion of affordable housing that is targeted in the RLDP. MCC has adopted a policy of requiring a higher proportion of affordable housing than other Welsh councils. There may be good reason why higher proportions have not been adopted elsewhere and UCS questions if this policy is set up to fail because it may be unviable. When combined with other factors (as described in this representation) the high proportion of affordable homes works against the viability of the RLDP on certain sites, not least Burrium Gate (Phase II).

As this is the first policy of its kind in Wales, UCS recommends that its viability is tested rigorously in the context of all site constraints in order to ensure that delivery on its goals is achievable.

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

30. Would you like to comment on this question *

☐ Yes

☒ No

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

31. Would you like to comment on this question *

☒ Yes

☐ No

32. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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*

UCS objects to Policy HA11 – Land east of Burrium Gate, Usk: The reduced housing target called for in response to Policy S1 above would remove the need for HA11. Aside from the 'in principle objection', the site's elevated development would be highly damaging to the town's unspoilt and rural context of steep hills clothed in woods and pasture etc.

UCS's objection is despite policy wording which states that the layout of Burrium Gate (Phase II) will be maintained with "a development ridgeline no more than 40m above Ordnance Datum (AOD), in order to protect the landscape character of Usk." A ridgeline even for a single storey house (e.g. 3.3m) would reduce the available area for development by 42% to 15,700sqm. Two-storey houses would reduce available land even further. Burrium Gate Phase I covers a plot of 18,400sqm and provides 13 large and 11 smaller houses – 24 in total. The plot is 17% larger than proposed Phase II but achieves 60% of the target for Phase II.

The prospect of achieving the full range of policy targets on this site is destined to fail. UCS therefore objects to Policy HA11.

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

34. Would you like to comment on this question *

☐ Yes

☒ No

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

35. Would you like to comment on this question *

☐ Yes

☒ No

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

36. Would you like to comment on this question *

☐ Yes

☒ No

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

37. Would you like to comment on this question *

☒ Yes

☐ No

38. Is your representation in support or objection? *

☐ Support

☒ Objection

39. 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.

*

UCS disagrees that the RLDP embodies workable solutions.

Burrium Gate Phase I has already highlighted that the unacceptable walking distance from Usk town centre translates into reliance on use of cars. Whilst the new development is within the 15 minute walking distance travel plan, the steep climb at the end of a walk or shopping trip makes this prospect less probable.

Additional bus stops added or relocated nearer the development would offer an alternative for longer distance travel but not change reliance on cars for travel into Usk.

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

40. 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)

41. 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)**

42. 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?**

43. Would you like to comment on this question *

☒ Yes

☐ No

44. Is your representation in support or objection? *

☐ Support

☒ Objection

45. 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.

*

UCS recommends that the RLDP should address surface water flooding both within HA11 Burrium Gate (Phase II) site and onto adjacent properties. This is a high-risk event as evidenced on 9 May 2023. The RLDP should acknowledge:

- Insufficient sponge acting land/too high percentage hard landscaping
- storm water tanks are an unreliable solution (as evidence 9 May 2023)
- natural water beds require a higher percentage of open/undeveloped land than is being proposed.

Ref: National Flood and Coastal Erosion Risk Management Strategy for England Natural Flood Management Technique #8: create swales, wetlands, green roofs, permeable pavements, detention ponds, filter strips.

Ref: Rotterdam Water Square Benthemplein

<https://www.architectural-review.com/buildings/water-square-in-rotterdam-the-netherlands-by-de-urbanisten> https://www.youtube.com/watch?v=dDkd_3vZchI

Ref: Sponge Garden

<https://landezine-award.com/sponge-garden/>

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>

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

☐ Yes

☒ No

47. 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)?

48. 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): *

Legal and Regulatory Procedural Requirements:

MCC has contravened its Delivery Agreement/Community Involvement Scheme. MCC committed to a DA/CIS that commendably and voluntarily embraced a scheme of public consultation summarised in the Officer Report of 1st Dec 2022 item 3.28 that: "Statutory consultation/engagement will take place over an 8-week period in Dec 2022-Jan 23... Following the stakeholder involvement, engagement and consultation on the Preferred Strategy, responses will be collated and carefully considered. A consultation report will be prepared and published containing details of the representations and the Council's response to them. A summary consultation report and the Preferred Strategy with any necessary amendments will be reported to Council in Spring 2023 to seek approval of the Preferred Strategy." The Council has contravened its own DA/CIS, and thereby contravened the 2005 (2015) Regulations and the Planning and Compulsory Purchase Act 2004 63-(1). The Preferred Strategy housing target is the single most important element of the RLDP and Members were denied the chance to consider it in the light of representations received before the Deposit Version was prepared.

Test 1:

RLDP fails Test 1 in that its excessive level of housing growth is not in general conformity with the South East Wales regional housing apportionment in Future Wales: the National Plan 2040. The RLDP unsustainably directs too much development away from the National Growth Area which is Cardiff, Newport and the Valleys. The Welsh Government (WG) letter to MCC of 27 Aug 2021 required a level of housing growth no greater than 4,275 units plus an appropriate flexibility allowance: "This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales."

The fact that the housing figure in the Preferred Strategy, carried forward into the RLDP, contains a higher figure of 5,400 which was acquiesced to by WG in a later letter of 26 Jan 2023, does not alter the fact that WG's 2021 initial view was that exceeding 4,275 homes as a target for Monmouthshire is excessive and fails to accord with Future Wales. Indeed, the later letter reiterated WG's stance that the housing target was too high, but acquiesced to it purely on the basis of need for affordable homes, but concluded by stating that further technical work is required to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. Objectors have also criticised the absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is no justification for the RLDP exceeding the WG housing target of 4,275 units plus an appropriate flexibility allowance.

Test 2:

UCS does not perceive the proposals for HA11 to offer additional social benefit to Usk as a town other than by providing new housing. The distance of the proposed development from the town centre – shops, hub, other facilities, surgeries – means that residents of new housing would be reliant on cars for transport and therefore would not by default contribute to or benefit from association with Usk as a place. Further, there is insufficient spare capacity for current new development in key areas including: sewage management, management of water run-off, car parking, doctor and dentist surgeries. The surgeries are at capacity accommodating combined populations of Usk & Little Mill. Proposed developments HA11, HA15 & HA16 require capacity for an additional 75 homes which is beyond this limit. MCC need to consult infrastructure providers to resolve the lack of capacity in the system. UCS does not believe the plan for the HA11 is sufficiently 'supported by robust, proportionate and credible evidence.'

Test 3:

Due to lack of space, UCS response to this Test is entered in a second Representation.

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.

49. 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

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

☐ Welsh

☒ English

Part 5: Welsh Language

51. 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?

52. 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?

About you

It is important for us to understand the potential impact of these proposals on different groups. The following section asks about where you live as well as questions that will allow us to analyse the responses received from people who possess one or more of the protected characteristics defined by the Equality Act 2010.

You are not obliged to complete these questions and can select 'prefer not to say'.

View results

Respondent

465

Anonymous

23:32

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)

Usk Civic Society (USC) continuation Test 3

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.

*

Please see Usk Civic Society's representation under [REDACTED] response until Part 3 Tests of Soundness. This representation is the continuation concluding on Test 3.

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)?

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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): *

Justifications for failure against Legal and Regulatory Requirements, Test 1 and Test 2 have been included in the Representation of Usk Civic Society made under the name of [REDACTED]. This representation under the name of [REDACTED] responds separately to Test 3 as the digital response form allowed insufficient characters to include it in a single entry. The two representations should be considered together.

Test 3:

UCS believes that HA11 land east of Burrium Gate (Phase II) is not as simple to develop as the proposals suggest and that the potential cost of the development will result in poorer quality or reduced amenity which would not deliver on the RLDP objectives. In extremis, the site may not be viable, and we therefore recommend the weaknesses included here are addressed in advance of concluding the Deposit Plan.

There is disproportionate pressure on commercial developers to deliver on quality and amenity whilst also achieving sufficient profit to manage their risk. Individually these higher cost aspirations might be achievable, but when combined they increase the risk of non-delivery on one or more aspect. These include:

- Provision of 50% affordable housing
- Incorporation of carbon neutral energies
- Incorporating green infrastructure and open space
- Steep contours, in particular the upper section of the site
- Development ridgeline no more than 40m above Ordnance Datum
- All new infrastructure including sewage, roads and community amenities
- On-site sustainable urban drainage systems within the site: water run-off is already flooding houses in Burrium Gate Phase I and on the lower side of Monmouth Road (9 May 2023)
- High density reduces area available for sustainable urban drainage systems
- High proportion of car parking required which will increase water run-off, which will also reduce the undeveloped portion of the site
- Good design
- Placemaking

In combining these factors for HA11 land east of Burrium Gate, UCS does not believe the plan is 'viable' as it stands, nor that the 'site allocated can be delivered.'

As MCC is eager to develop multiple sites at the same time with pressure to deliver in a short period, MCC is in a weak negotiating position through the procurement process. Concessions are inevitable because of pressure to deliver, and the shortage of commercial developers prepared to accept both the risks as well as the obligations of the RLDP.

But these points are only relevant if the target number for new housing are maintained at higher rates than have been judged by WG to be necessary. The reduced housing target called for in response to Policy S1 above would remove the need for sites such as Usk Burrium Gate (HA11).

UCS requests that the target for new housing within Monmouthshire is reduced to the WG housing target of 4,275 units plus an appropriate flexibility allowance because this would be proportionate to the needs of Monmouthshire and would reduce long term damage to our cherished landscape.

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.

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☒ Yes

☐ No

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

☐ Welsh

☒ English

Part 5: Welsh Language

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

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