



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit
Representations Register

Volume 23 - County Councillors



monmouthshire
sir fynwy

Representor No.	Representor Name
1677	Councillor Frances Taylor
1803	Councillor Dr Louise Brown
2484	Councillor Jane Lucas
2489	Councillor Lisa Dymock
2497	Councillor Paul Pavia
2498	Councillor Penny Jones
2505	Councillor Steven Garratt
2821	Councillor Rachel Buckler
3118	Councillor Meirion Howells

1677

Councillor Frances Taylor

County Councillor Frances Taylor
RDLDP Comments 15/12/24 – Objection

General Comments

The overall RDLDP lacks balance.

Monmouthshire is not part of the strategic growth area and whilst there must be some growth, the spatial strategy once again places a disproportionate, however it appears that a degree of the development, particularly the employment-based allocations in Magor with Undy put development above the protection of the Gwent Levels, the integrity of the Llandeenny and Redwick SSSI and the Council's declared nature and climate emergency.

One notes the level of affordable housing proposed, how will the level of affordable homes sit alongside the development of required infrastructure with reference to Health, Wellbeing, Education and Public transport? How will the council ensure that priority is given to Monmouthshire residents with local connections for this affordable housing?

There is a quota for Affordable Housing, however this does not disaggregate into quotas for providing homes for the over 50s, or homes for life. The RLDP states there is an ageing demographic in the County yet there is no quota to ensure provision of suitable housing. Older people generally wish to be healthy, mobile and independent for as long as possible, however there is a shortage of appropriate small scale locally sympathetic dwellings with on site community facilities. Developments ought to be located in existing communities so that residents can access local services.

The RDLDP says that Monmouthshire: occupies a strategic location at the gateway to Wales, easily accessible by rail and road from the major centres in South Wales, the South West of England, London and the Midlands. However, this is not the case. Monmouthshire is not well served by public transport. Service improvements in Abergavenny, Chepstow and Caldicot are welcome, but even in the peak – the Chepstow service is not frequent. Of course, other parts of the county have no rail services at all. You will be aware that Magor station is due to be delivered as part of the Burns commission recommendations for new stations along the mainline. Magor Station can be delivered without all the mainline improvements necessary for other stations. However, it is not yet delivered.

Once 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 also the matter of cost to access public transport. The cost to get a train from Caldicot to Cardiff costs 11.60. However, to travel from Aberdare to Cardiff (a longer journey) costs circa 5.20. These facts do not lend themselves to the development of sustainable settlements.

Bus services are generally poor. Indeed even in Severnside bus services are only hourly, in other parts of the county areas are extremely poorly served. Much of Monmouthshire is only a commuter's paradise if you own a car, Magor with Undy is a great example of this.

To encourage the promotion of sustainable communities where residents can live and work in the same area, the RLDP proposes that housing growth will be accompanied by a commensurate amount of employment land. The previous LDP had the same policy and the employment land at Rockfield Farm (the strategic site in Magor with Undy) has still not been brought forward and is proposed to be rolled forward for office/light industry.

S4 Climate Change S17 Green Infrastructure and Nature Conservation

This is a primary concern, yet the interpretation of planning policy seems to offer little mitigation. The plan policies do not cumulatively mitigate against Climate change with little real offer in terms of integrated transport, community facilities and 20 minute community infrastructure.

Policy EA1 – Employment Allocations Employment Land Allocations at Quay Point and Gwent Europark

There is little or no regard paid to the Gwent Levels and to the Magor and Llandevenny SSSI in respect of the employment land proposed at candidate sites in Llandevenny. 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 Llandevenny 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.

This is flawed and has the potential to undermine the whole RDLP.

EA1f: Quay Point, Magor is adjacent to SSSI and has stringent requirements in PPW 12.

EA1h: Allocation of Gwent Euro Park, Magor is on SSSI and protected from development by PPW 12. The credibility of the extant planning permission is arguable. It is not reasonable to include this as a rationale and the basis is flawed. It has been extended and extended with changes of use class over the decades. Planning permission is for use classes only, not a waste site.

50% of Monmouthshire's economic development land is concentrated in Magor with almost all of it allocated on Quay Point and Gwent Europark. These the two sites in Llandevenny, Magor serve to wipe out the historic hamlet. The administration's lazy approach to considering employment land is disproportionate and is contradictory to the stated intent of the plan in terms of climate, ecology and preserving the Gwent Levels landscape. Policy S4 states that

Industrial development on natural or semi-natural land habitats should only be permitted under extreme circumstances and only if remediation greatly exceeds the losses caused by the development. Development on land that presents significant threats to Sites of Special Scientific Interest should not be undertaken. These two sites conflict with both these criteria.

It is essential that every effort is made to prevent further destruction of natural or semi-natural Designating almost a half of its economic development area on carbon-sink land is unacceptable and demonstrates the council's lack of any real commitment or vision.

Protecting existing green, undeveloped land is vital to tackling the climate emergency.

On an ecological level, the industrial development of Quay Point and Gwent Europark presents unacceptable environmental damage to the Llandevenny and Redwick SSSI due to the risks posed to the drainage system of the Gwent Levels. The run-off from either of these sites once developed or further developed poses a serious risk to the water quality of the Gwent Levels drainage system.

The idea of a waste management site on or adjacent to SSSI is extremely concerning.

Quay Point and The Gwent Europark drain directly into the Gwent Levels SSSIs and any further industrial development here should stop as it is not necessary for the management of the SSSI and has the potential to cause significant damage.

I am also concerned about the impact on the ancient settlement of Llandevenny and the landscape character of the Gwent Levels.

The proposed RLDP economic development proposals in Magor would leave Llandevenny as a group of historic buildings within an industrial estate and do not accord with Policy LC1 on protection of historic landscape value. There is also the cumulative degradation of the historic Gwent Levels landscape. The landscape sits on the border between Monmouthshire and Newport suffers neglect as a result. The landscape has not been valued by successive local authorities, hence the existing unfettered development at Gwent Europark and Magor Brewery. I am particularly concerned about increased in surface water flooding resulting from run off from ongoing development at Magor Brewery.

The administration has made much of their Net Zero aspirations to reduce development impact on climate change. The RLDP assert that new homes will have electric car chargers, and no fossil fuels will be allowed.

However, in the face of the further destruction of the Gwent Levels and the Llandevenny and Redwick SSSI, this measure pales into insignificance in terms of the impact on climate change remediation.

The RLDP does not propose the same restrictions on Industrial or public development. All industrial and public development approval should be conditional on the provision of on site low impact on the environment renewable energy generation. All on-site options must be fulfilled before a developer can be allowed to seek permission to develop renewable power sources off-site. To this end it should be a planning condition that the roofs of all new development be designed to support solar panels.

Policy S2 – Designated Amenity Land/Open space and CI4: Areas of Amenity Importance.

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.

‘Areas of Amenity Importance are identified on the Proposals Map’.

An Area of Amenity Importance Review (Oct 2024), provided with the RLDP consultation evidence base, proposes removal of several Areas of Amenity Importance (AAI) status allocated in the Adopted LDP, to both The Land to the North of Magor and Undy and the Land at Pennyfarthing Lane. They have both been removed as AAI from the Proposals Map. Relegating the status of this land to general open space or open countryside does not provide protection in the RLDP from development. As illustrated above. The officer led review of AAI feels very subjective and is just that, an officer view. It concludes that the buffer zones around Magor with Undy are not of high recreational value. This takes no account of resident views or experience, the view of the Town Council or indeed local member views and it is not acceptable.

The Open Space Study Oct 2024 provided with the consultation evidence base identifies that Magor Undy has a general deficiency in Open Space.

In October 2023, an e-petition to Save Our Green Spaces in Magor and Undy achieved 1256 signatures. There is a large depth of feeling in the community regarding the erosion of our green spaces.

The community has plans to turn these sites into publicly accessible, usable, recreational open space and requests that they have their AAI status reinstated and, in the case of the Land to the North of Magor and Undy, extended up to the M4 boundary. This is also inconsistent with Objective 8 of the RLDP. To improve access for all to recreation, sport, leisure activities, open space and the countryside.

Health

A Healthier Wales (Well-being Goal 3)

Objective 8	Health and Well-being	To improve access for all to recreation, sport, leisure activities, open space and the	18, 20, 21, 33, 35	Active and social places	Take action to address inequities, particularly in	A Fair Place to Live.
--------------------	------------------------------	--	--------------------	--------------------------	--	-----------------------



RLDP Objective Number	Headline	RLDP Objective	RLDP Issues addressed	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.			relation to health, through the framework of the Marmot Principles.	A Safe Place to Live. A Connected Place Where People Care.

There are 770 homes proposed with no provision for GP surgery (or contribution towards expansion of Grayhill surgery). Evidential document, The Infrastructure Delivery Plan Background Paper Oct 2024, para 3.66 states,

‘The council has engaged with ABUHB throughout the RLDP process and there have been no concerns raised about the current capacity of services within the area’

This does not appear to be the case, the ABUHB lead for Primary Care advised that there has been no engagement and indeed there are significant capacity issues. Magor Surgery has been closed in the afternoons due to the capacity issues of Grayhill surgery. This is inconsistent with the objectives of the RLDP.

1803

Councillor Dr Louise Brown



**Office
Use Only**
Represent
tor
Number

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

Monmouthshire Deposit Plan Representation Form

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

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

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

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

planningpolicy@monmouthshire.gov.uk.

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

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

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

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

- The level of development being proposed in the South of the County which covers areas which are geographically close together of Chepstow, Caldicot East (North Portskewett) and Severnside is unsustainable due to the already broken infrastructure.
- Monmouthshire County Council (MCC) stated in a letter dated September 2022 at the Place Scrutiny Committee meeting that it cannot support the proposed Forest of Dean (FOD) Plan unless it is accompanied by a comprehensive and funded package of transport improvements that avoids aggravating the existing problems which included the Chepstow relief road due to traffic from the FOD going through Chepstow to get to the motorway junction for Bristol and Newport.

<https://democracy.monmouthshire.gov.uk/documents/s32728/4b%20FOD%20Second%20Preferred%20Options%20Consultation%20Letter.pdf>

- MCC needs to apply the same response to its own plan. Further house building in the FOD and Monmouthshire cannot be supported unless it is accompanied by a comprehensive and funded package of road transport improvements that avoids aggravating the existing problems.
- ROAD INFRASTRUCTURE IMPROVEMENTS ARE NEEDED FIRST AND FOREMOST BEFORE ANY ADDITIONAL HOUSE BUILDING IN THIS PLAN IN THE FORM OF A CHEPSTOW RELIEF ROAD, HIGH BEECH ROUNDABOUT IMPROVEMENTS AND M48 LINKS AND WITHOUT THESE MEASURES THE WHOLE PLAN OF BUILDING IN THE SOUTH OF THE COUNTY IS UNSUSTAINABLE AND CANNOT BE SUPPORTED.**
- Infrastructure improvements are also needed in terms of Doctors, Dentists, ambulance services and health board improvements to not aggravate existing



problems.

- Site specific Infrastructure requirements need to be added and any developments contingent upon them. Any development in Chepstow and Caldicot East (North Portskewett) needs to include and be contingent upon all of the road infrastructure improvements mentioned in red above.
- The vision and objectives in the current adopted LDP 2011 -2021 (see page 44) are more appropriate than those stated on page 24 of the RLDP vision.
- The current vision preserves the distinctive character of Monmouthshire's built heritage, with the countryside and environment assets to be protected and enhanced, the rural character of Monmouthshire will be preserved and enhanced and its historic market towns such as Chepstow will be preserved and enhanced.
- The economy of the tourism industry relies upon this current distinctive rural and historic character being retained and enhanced. The vision in the RLDP fails to properly protect and enhance these factors which are important for the sustainability of our tourism economy with rural Monmouthshire being an attractive place to visit.
- However, the deposit stage vision for the RLDP will sacrifice that vision and result in the over-development of a very small geographical section of the Southern part of Monmouthshire which is the gateway to Monmouthshire's tourism industry and create an almost continuous swathe of housing development.
- It will simply become a car commuting suburb of Bristol, Newport and Cardiff and an unattractive area to visit due to its road infrastructure already being at breaking point with extra housing bringing traffic to a standstill. Why would visiting tourists want to spend a significant amount of time stuck in traffic queues which would ruin a tourist day out and prevent repeat visits?
- There are regular traffic congestion queues on the A48 at the bottom of Pwllmeyric Hill and at the bottom of St Lawrence road for the High Beech roundabout at Chepstow and it can take an hour to travel 1.7 miles from Pwllmeyric to Chepstow town centre.
- The additional housing proposed in Chepstow and Caldicot East will mean that Chepstow will daily continue to grind to a standstill and get even worse meaning school children cannot get to school, shoppers not able to get to town, commuters cannot get to work, people cannot get to Drs appointments etc. Impacting the health and wellbeing of existing and new residents. Contrary to the health and wellbeing side of planning.



- At the Place Scrutiny Committee on the 7th of November 2024, the officer report indicated that tourism is a very important source of employment for Monmouthshire with 15% of jobs being attributed to it.
- According to Monmouthshire STEAM, in 2023, 2.29 million visitors came to Monmouthshire, spending 3.53m visitor days in the county, generating more than £329 million for the local economy, and supporting 3,462 full time equivalent (FTE) jobs. (Monmouthshire 2023 STEAM full report & summary).
- The Monmouthshire labour market stats give a total number of jobs for Monmouthshire of 35k. using the part time / full time split for Monmouthshire, the 3,462 FTE jobs are equivalent to approximately 5,143 actual jobs (assuming FT is 37 hours per week and PT 16 hours). This means that 15% of Monmouthshire jobs are supported by tourism spend.
- The previous figures were as follows: “Tourism plays a significant part in the Monmouthshire Economy and the sector brought in £245m to Monmouthshire in 2019 and supported the equivalent of 3.119 full time jobs (see page 12 of the preferred strategy). “
- This means that the tourism sector brought in an increase for the Monmouthshire Economy from 2019 of £245m to £329m in 2023, increasing by just over a third.
- **Tourism should be a main objective of the MCC vision and plan , it was objective 16 of the preferred strategy part of the previous consultation, I commented at the preferred strategy stage, that it would not be achieved but highly surprised it has been totally removed altogether as an objective for the deposit stage. It is such an important part of our local Economy, and it amply demonstrates how harmful the vision and objectives of this deposit stage of the plan are to the prosperity of Monmouthshire as a tourist destination.**
- **It even proposes a development at Mounon Road Chepstow which can be seen as a gateway to both Wales and an advertisement for rural Monmouthshire by taking away an important rural view as you enter the County and instead creating an impression of a continuous swathe of urban housing.**
- It will fail to combat the key issues and challenges for more affordable housing, a population getting older, high-cost housing or air quality with Chepstow having worse pollution levels than Bristol. Air Quality will deteriorate due to the traffic from the over-development of this narrow band in the Southern part of Monmouthshire.



- Developers will not provide either the road infrastructure required and what is needed prior to any new housing. The infrastructure improvements to the roads must come first. This includes High Beech roundabout improvements like the Coldra off junction 24 of the M4, a new Chepstow bypass and M48 junction at Severn Junction area as well as any other significant road improvements.
- There is little likelihood of the provision of the millions required from the Welsh Government to ensure the provision of 50% affordable housing on sites as developers will argue viability issues. Hence higher market value housing will predominate and available only to those with higher capital to buy, who are likely to be older. Objectives 8, 9 and 10 will not be achieved in the same way it has not been achieved in the last LDP.
- The population getting older is simply a symptom across the whole of England and Wales. Population studies show that rural areas like Monmouthshire have older populations than cities. The comparison between MCC average age and the younger average age in Cardiff is a false comparison and Cardiff has a large student population.(see page 13 and 14 of the deposit plan). Objective 9 will not be achieved.
- The quality of life and the health and well-being of the population in objective 8 will not be enhanced by the extra pollution caused by increased traffic in the Chepstow and Caldicot area of Monmouthshire by the proposed additional housing concentrated in these areas. It will be unsustainable due to the lack of road infrastructure, contrary to the vision. Objective 17 will not be achieved as air quality will not be improved by extra traffic from extra housing concentrated in a small area of South Monmouthshire.
- Objective 14 on infrastructure fails to even mention or consider the lack of infrastructure in the Southern area of Monmouthshire with no mention at all of road infrastructure which is at breaking point in Chepstow and surrounding areas.
- Whilst only 3% of Monmouthshire is developed, 80% of this is in the South of the County and it will create large areas of continuous housing in a concentrated area. Local areas also suffer from waits for GP appointments and the lack of dentists as well as the lack of a local minor injuries' unit.
- The use of BMV for development in the vision is contrary to the Planning Policy Wales Edition 11 policies. The argument is that MCC has an excess of



BMV land and limited brownfield land. However, the best agricultural land is a finite resource across the whole of Wales, and it needs to be preserved for future generations and for local food growth particularly in a globally uncertain world. The Councils climate emergency declaration indicates the need for more locally grown food in Wales and reducing carbon emissions by reducing long international journeys to provide food. The energy crisis has indicated how it is important to make local provision. However using BMV land for housing rather than local food production will mean additional harm to the environment from the provision of food from abroad.

- There is nothing in this RLDP about allotments being provided in all housing developments and to use council owned farmland in this way as well as the priority for farmers to use BMV land for farming and food production on the basis that this is a finite asset.
- This section of the RLDP Deposit Plan fail to mention the issue of developments in the nearby Forest of Dean impacting Chepstow and surrounding area. The 1700 additional houses in Lydney in the last plan has resulted in additional traffic coming into town from the Gloucestershire side joining the motorway in Chepstow.
- To reiterate, MCC at the Special Place Scrutiny Committee on the 26th of September 2022 indicated in a letter to the Forest of Dean that they could not support the Forest of Dean next LDP without a Chepstow bypass (referred to as a Chepstow Relief Road) and active travel measures. The Forest of Dean proposal being to build 7440 houses, with the size of Lydney increasing from 11K to about 15 to 16K as well as 600 houses at the barracks at Sedbury Chepstow Gloucestershire. Chepstow has already felt the impact of the additional housing at Lydney in the last plan for Lydney residents who commute to Bristol via Chepstow. Please see South Wales press report in the following link:
- <https://www.southwalesargus.co.uk/news/22645332.forest-dean-council-house-building-plans-prompts-call-chepstow-bypass/>
- Please see extract of letter from MCC at that Place Scrutiny meeting on the 26 September 2022 which says as follows:
- “There is an existing commuter flow of residents from the south of the FOD along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48, both of which are trunk roads for these relevant stretches through Monmouthshire. Additional development between Lydney and Chepstow will exacerbate existing traffic issues in Chepstow. Without mitigation, it will worsen existing problems at the A48



Hardwick Hill air quality management area, aggravate existing blight and severance, and increase road congestion on the A48, High Beech roundabout and the A466.” (FOD= Forest of Dean).

- However, the same criteria applied to the Forest of Dean’s proposed new RLDP has not been applied to the MCC RLDP plan which makes it also unsupportable and unsustainable without the road infrastructure investment coming first.
- People who live in Chepstow and the surrounding area are ignited by the proposals in this plan. It is seen as a “no brainer” to need more road infrastructure first before any more housing in either the Chepstow and surrounding area in Wales and in the Forest of Dean in England.
- Chepstow is a border town with half of it in Monmouthshire Wales and half of it in Gloucestershire England and it has a great impact due to its close proximity.
- It is expected that the FOD plan will add even more housing than is currently proposed and thereby have a highly significant impact on Chepstow.
- Highway studies from both the English and Welsh Government have predicted the increase in traffic because of the tolls on the Severn Bridge being removed and High Beech roundabout being well beyond its road capacity.
- The Welsh Government and the Welsh Inspectorate is referred to the online debate on the RLDP deposit plan in the County Council on the 24th of October 2024 and the contributions by County Councillors in Chepstow and the surrounding area.
- It should also be borne in mind that MCC is not seen as a growth area in the Future Wales Plan 2040 with the growth areas being Cardiff, Newport, and the Valleys.
- Objective 4 on flooding is not being taken seriously by the removal of the current policy on this which provides a local reminder of the importance of the national policy in TAN15. It is no good arguing that there is a national policy, as the local policy should refer to the need to comply with TAN15.
- The RLDP will ignore the requirement of Future Wales 2040 plan policy 34 which recognises that there is a large green belt around Bristol and likewise



the need to protect Chepstow and the surrounding area by a similar large green belt area (see page 172).

- Future Wales 20240 plan states that: “In advance of a Strategic Development Plan, the areas shown for consideration for green belts should be treated as if they have been designated as green belts by a Strategic Development plan. Planning Policy Wales sets out the circumstances and limited forms of development which may be applied to the areas identified for consideration of green belts.”
- St Lawrence Road Chepstow was closed due to Ash Die Back works for just over a month. The traffic is so bad because of work on just one road that during the day it took one hour on the 25th of January 2023 to get from Pwllmeyric to the main Tesco, a journey of only 1.7 miles.
- The road network simply cannot take any additional housing without the road infrastructure being improved first, which is already needed to cope with the existing developments in Chepstow and the Forest of Dean.

P

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.

Strategic Policy S1 – Growth Strategy In order to meet Monmouthshire’s core purpose of building sustainable and resilient communities for all, between 2018 and 2033 the Plan will make provision for: • 6,210* homes to meet a housing requirement of 5,400 homes. • A minimum of 38ha of employment land (Use Classes B1, B2, B8). The focus of this growth will be on the County’s most sustainable le settlements, as outlined in the sustainable settlement hierarchy set out in Policy S2. *This figure includes an indicative 15% flexibility allowance.



In relation to the Policy S1 quoted above, please see my answer to question 1 on the proposed growth being unsustainable due to the lack of road and health facilities. The proposal is for 50% affordable housing as a priority, it is unlikely to achieve such figures due to viability issues and even if it does so it means that developers will find that there is little or nothing left to contribute to much needed road and health infrastructure (i.e..Doctors and Dentists, local hospital facilities as Chepstow has no minor injuries unit).

The proposal does not make it clear that the main towns in the Southern area as so close together for Chepstow, Caldicot and the Severnside area and thereby the level of development is unsustainable.

It is worth noting In the last LDP Caldicot was not seen as a sustainable town.

It is incorrect to call all of the development as Caldicot East as it is North Portskewett area which is just a village merging with Caldicot as part of urban sprawl.

Chepstow is an unsustainable town for development as it cannot sustain its current level of traffic congestion and more housing will bring it to a standstill.

Traffic from the Caldicot East – North Portskewett development will come along the Pwllmeyric A48 road to join the motorway junction at Chepstow adding to the queues for the High Beech roundabout which are already fairly regularly queued to the bottom of the Pwllmeyric hill. In addition, traffic will be added to the pinch point of the High Beech roundabout by the proposed Mounton Road site.

To have a development right next to the High Beech roundabout at Mounton Road is seen by local residents as “madness”. In view of the high congestion at this roundabout already and will block the free flow of traffic even more. This development of 146 houses, a hotel and care home should be taken out of this RLDP and any other development in Chepstow as the roads cannot take any further house building. It would be possible to do so in view of the 15% margin in this RLDP which was previously only 10% in the current LDP.

In the last LDP only 3000 out of the 4500 were built, meaning on average 300 per year. The Build rate is very over-estimated, as is the likelihood of getting 50% affordable housing.

It is contrary to the National Future Wales 2040 which does not see Monmouthshire as a growth area.

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

Support:



objection?	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Policy S2 seeks to focus new development in the primary settlements of Abergavenny (including Llanfoist), Chepstow, Monmouth and Caldicot including the Severnside area, together with a lower level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. It sets out the proportion of residential growth to be accommodated by each of the settlement tiers (a full breakdown is available in the Housing Background Paper). As such, the spatial strategy will assist in addressing our core issues in relation to affordable housing delivery, rebalancing our demography, responding to the climate and nature emergency and supporting sustainable economic growth. Please see answer to question 1. Whilst only 3% of Monmouthshire is developed, 80% of this is in the South of the County and it will create large areas of continuous housing in a concentrated area. Local areas also suffer from waits for GP appointments and the lack of dentists as well as the lack of a local minor injuries' unit at Chepstow. By contrast Abergavenny still has its own minor injuries unit at Neville Hall hospital Abergavenny albeit there has been a cut in the overnight provision and there has been the significant road development in the Heads of the Valleys roads making the North of the County more sustainable than the South of the County. The proposal does not make it clear that the main towns in the Southern area as so close together for Chepstow, Caldicot and the Severnside area and thereby the level of development is unsustainable. In the last LDP Caldicot was not seen as a sustainable town. It is incorrect to call all of the development as Caldicot East as it is North Portskewett area which is just a village merging with Caldicot as part of urban sprawl. Chepstow is an unsustainable town for development as it cannot sustain its current level of traffic congestion, and more housing will bring it to a standstill. The distribution of residential development shows that 13% in Chepstow and 35% in Caldicot including Severnside which are in the South of the County and geographically very close together. This compares to Monmouth at 15% and Abergavenny at 22 %. This means that nearly half the growth for the main towns is located in a geographically close area in the South of the County which already has 80% of the developed area and only about a		



third in the main towns in the North of the County.

In my opinion, the residential growth should be concentrated in the North of the County which has a better infrastructure particularly in view of the development of Heads of the Valley roads.

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

Is your representation in support or objection?

Support:

Support GW1 but see exception.

Support OC1

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.

OC1 – New Built Development in the Open Countryside- support

GW1-Green Wedge Policies -support except that the current boundary for the green wedge for Chepstow and Pwllmeyric should be kept so that land at Mounon Road Chepstow is not built upon –

GW1- support but except that should include the Mounon Road site at Chepstow being included within the green wedge gap between Chepstow and Pwllmeyric which it currently is included in the current LDP.

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

Support:



objection?	Objection:	Objection as policies need amending
------------	------------	-------------------------------------

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 S3 – Sustainable Placemaking & High Quality Design Development will contribute to creating high quality, attractive and sustainable places.

iv) Protect and enhance the natural, historic, conservation area and built environments and show an understanding of how these function together to contribute towards the quality of places.

Please add the words “conservation area” to S3 iv) above.

Also add to S3 v) Protect and enhance the character and density spacing of dwellings particularly in or close to conservation areas.

PM1- Creating well designed places

a) respect the existing form, scale, siting, height, massing, materials (including colour) and layout of its setting;

Change to the following;

a)respect the existing form, scale, density, spacing, siting, height, massing, materials (including colour) and layout of its setting;

Add the words density and spacing to it.

PM2-Environmental Amenity

Remove the following words:

unless it can be demonstrated that measures can be taken to overcome any significant risk

The words need removing from PM2 as they significantly weaken the environmental amenity policy which should be strengthened in view of support for climate change in the RLDP. In addition, it should clearly state that proposals which result in air pollution increases likely to result in thresholds above the World Health Organisation (WHO) air pollution levels for nitrogen and other pollutants should be refused in view of the importance of climate change policies to improve our environment and the health and wellbeing for both existing and future residents.

Policy PM2- This needs to also include the wording of the current adopted plan policy EP1 in the first paragraph to make it clear that it should not have a detrimental impact on neighbouring properties.



Change PM2 to add: Development including proposals for new buildings, extensions to existing buildings should have regard to the privacy, amenity and health of occupiers of neighbouring properties.

It is important to add this as planning is required to take account of both environmental protection and the health and wellbeing of residents.

Policy PM3- whilst helpful to have a distinct policy for advertising it needs to be changed to include the above to add- Development including proposals for new buildings, extensions to existing buildings and advertising should have regard to the privacy, amenity and health of occupiers of neighbouring properties.

Policy HE1- the policy needs to add in paragraph c) colour. Bright colours not only impact the conservation area but can also have a poor impact on the landscape.

Also that appropriate landscaping will be added to enhance the character of the conservation area including areas adjacent to conservation areas. In other words, improving on the wording of a).

HE2 and HE3- no comments

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.

The climate change policy needs to be strengthened and is too weak in its wording and the accompanying policies on infrastructure and sewerage need to be vastly improved. Developments without adequate sewerage infrastructure and water quality should be refused and the policies should clearly state that is the case and no development should take place until it is adequate. Otherwise, development will be contrary to climate change if they result in polluting our water courses, brooks, rivers and sea. So, it should state that developments with inadequate sewerage infrastructure likely to result in and/or add to



pollution to water courses, brooks, rivers and seas will be refused and account needs to be taken of the increased likelihood of the water table rising due to increased heavy rain fall and storms due to climate change..

Policy S4 on climate change needs to change to make that clear. It is not helped by the policy on infrastructure which places it near the bottom of the list and means that effectively there will be little or more likely no contribution from developers towards this aspect. This particularly impacts the proposed development at Shirenewton in connection with sewerage infrastructure which covers virtually all the villages in the Shirenewton ward of Shirenewton. Mynyddbach, Moun-ton, Pwllmeyric and Mathern. It is an issue also raised in relation to the proposed Monmouth site on water quality as opposed to sewerage.

NZ1- There needs to be policy of net zero to apply to new build employment and industrial buildings as well.

CC1- Policy on Sustainable Drainage- the policy should add that all new building developments will be required to have an inspection prior to residential occupation to ensure that adequate drainage is in place in order to prevent potential future flooding of residential developments which is more likely in view of heavier rainfall due to climate change.

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

Is your representation in support or objection?

Support:

Objection:

Objection as needs amending

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.

S5- Green Infrastructure, Landscape and Nature Recovery-This needs to add that green space provision not only covers public space areas but also that each dwelling has its own garden.





G-11- no comment

G-12- this needs to add protection for ancient woodlands in the first paragraph as poultry farming may increase ammonia levels which is damaging to trees and ancient woodlands. See the response of the Woodland Trust to a recent poultry farm application based at Shirenewton. An environmental impact assessment should look at ammonia levels to protect tree areas. Poultry farm applications require both an environmental impact assessment and a habitats regulation assessment and account needs to be taken of the Finch versus Surrey County Council case following the chain of disposal. The RLDP needs to note all of these requirements. It also needs to note that a number of poultry farm applications are on hold by the Welsh Government in view of the need to review and update the phosphate regulations.

LC1- This needs to add on the last sentence “ but the importance of all landscapes will be protected”. Also, the policy LC1 needs to add that the use of materials and muted colours must be used to protect the landscape and visual amenity.

LC2-no comment

LC3- no comment

LC4- The Gateway to Wales where Mounton Road site is located also needs to be protected from development as if developed on is a poor gateway to exploring the ANOB for visitors and for tourism. The historic buildings also need to be protected which relates also to the Mounton Road site by High Beech roundabout.

LC5-This policy on dark skies and lighting needs to be added to.

- i) Particular care needs to be taken in or adjacent to conservation areas and/or in villages without street lighting.

For example, Shirenewton does not have any street lighting in its conservation area and the main street areas and developments need to respect that.

NR1- Delete this information in red on this policy on nature recovery and biodiversity as it weakens and compromises the protection:

Development proposals that are likely to damage a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or the continued viability of priority habitats and species, or Section 7 list of species and habitats, will only be permitted where: a) The need for the development clearly outweighs the biodiversity, ecosystem resilience or geological importance of the site; and b) It can be demonstrated that the development cannot reasonably be located elsewhere. Where development addresses criteria a) and b), it will be expected that any unavoidable harm is



minimised by effective avoidance measures and mitigation. Where this is not feasible, appropriate provision for compensatory habitats and features of equal or greater quality and quantity must be provided on-site and where not possible, off-site. Where appropriate, long-term management and maintenance of biodiversity must be secured.

NR2- Severn Estuary - Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked Land will not be supported unless it can be demonstrated that no adverse impact on the integrity of the European Marine Site will occur.

Strengthen the policy NR2 and change to :

Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site, or Functionally Linked Land will not be permitted.

NR3- Protecting the water sources is important and there are concerns in the Monmouth area.

Why is there no policy on the need to connect to a mains working sewerage system without a broken/ unrepaired pipe. (see comments on the Shirenewton site in answer to question 10).

PROW1-Add to the policy

The environmental health concerns of public rights of way where the sewerage system is not repaired and leaks into public areas is not permitted, and development will not be permitted until the mains sewerage pipe is either properly repaired or the mains sewerage pipe is fully replaced.

Simply arguing “no detriment” by the water board and doing a little bit more of a phased repair to a broken leaking pipe without fully repairing the pipe or replacing it is totally unacceptable and development should never be permitted in such circumstance for the health and wellbeing of residents walking with children or dogs through a field polluted by human sewerage, which is a public right of way.

An example was given in the Place Committee on the 5th of December 2024 of how in one area of Wales where bales of hay were used to ineffectively contain human sewerage overspills, it resulted in a dog walked by its owner in a public right of way field area having to have its stomach pumped out by a vet due to the ingestion of human sewerage. Hence how important for the health and wellbeing of both residents and domestic pets of having the above policy.





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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

Policy S6- Strong Objection as the policy does not even mention road infrastructure which in view of the traffic congestion should be at the top of the list. Transport Infrastructure never even mentions road infrastructure. Placing affordable housing at the top of the list and at the level of 50% affordable housing which means for viability reasons there will be little left for the required additional pressures placed upon the area and the need for road, health and water and sewerage infrastructure. It is irresponsible of both the water board and the Council to accept additional housing on to an inadequate mains sewerage system relying on a medieval system of bales of hay. (See answer to question 10 on the proposed Shirenewton site).

Policy 1N1-It needs to add about not impacting the landscape.

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

Policy S7- Affordable housing suggests that 50% affordable for sites over 20, it is unlikely to



be achieved but it is not clear why smaller sites are only being asked for 40%, with 1 to 4 homes only a financial contribution. 4 homes should require 2 to be affordable and 3 homes 1 affordable and 1 to 2 homes a financial contribution.

There should be policies to stop a developer going for a lower amount at the start and then adding to it later. For example, on 5 homes they would go for 4 on this policy and then add one later. It needs to have a cumulative impact policy, so that phasing of development has the same impact in terms of affordable housing or contribution towards it.

I have seen an instance of where 3 dwellings for conversion for residential usage were applied for separately for planning permission as 3 independent planning applications to avoid any contribution to affordable housing. A developer could also phase the development to obtain a lower percentage of affordable housing. Hence the need for a cumulative impact policy where the phasing of dwellings results in the same percentage of affordable housing or the same amount of contribution.

Policy S9- Land at Crick Bradbury Farm- This provides for 7 pitches, however there are already Gypsy and Traveller sites in the close vicinity, and this results in a concentration of sites in a small geographical area in the South of the County and none in the North. It is proposed to be close to a site for residential development.

Policy S9 should state in the policy itself that it will be designed in line with the Welsh Government guidance on Designing Gypsy and Traveller sites. It should also include the specifications in policy GT1 on landscaping and highways etc. It needs to have its own separate entrance and exit and to be landscaped so it is separated from the housing development. The use of large vehicles for the site means that it would not be suitable to have to drive through a housing estate with its narrow roads (based on the manual of streets) and there is likely to be on street parking which would make for access difficulties if the same entrance and/or access was used, and the site needs its own entrance and exit to the highway.

Policy H1-H6 similar to current LDP.

If there is a strict policy of no new build in the open countryside then policy H4 should not be allowed.

Policy H8- This should be a lower number of houses and include the need for more bungalows to cater for Monmouthshire's elderly residents and to allow for downsizing so that large houses will be available for younger families.

The housing mix should apply to all housing sites not just specialist.

Policy H9- This policy needs to add that the housing built will be available to local people



who have been brought up or have a local connection to the area.

Policy GT1-Add to this h) the site is not located in the South of the County for Gypsy, Traveller and Show People, to ensure a geographical spread of available sites across the County, as most are already concentrated in the South of the County.

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

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

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

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

Please 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.

Mounton Road Site- Policy HA3-objection

This piece of land is an important green wedge between Pwllmeyric and Chepstow building on this land would create urban sprawl and compromising the identity of the village of Pwllmeyric. It is contrary to the current LDP policy LC6 which states as follows:

“Policy LC6 – Green Wedges In order to prevent the coalescence of the settlements listed below, the areas between them are identified as Green Wedges, as shown on the Proposals Map: a) Undy, Llanfihangel Rogiet and Rogiet; b) Rogiet and Caldicot; c) Portskewett and Sudbrook; and d) Shirenewton and Mynyddbach; e) Chepstow, Pwllmeyric and Mathern.”

The map shows how close it is to Mounton House Special School which is in Pwllmeyric.



It would be development close to the High Beech roundabout which already suffers from massive traffic congestion and building more houses right next to this roundabout is totally unworkable. Any access would need to be on the St Lawrence Roadside and just add to the traffic chaos by vehicles/ pedestrians entering and exiting the site blocking any chance of any free flow of traffic off and onto the roundabout. Local people have expressed the view that development on this site is “madness” because it is so close to the roundabout.

The use of the eating places next to the garage closest to the roundabout is already blocking the flow of traffic off the roundabout into Chepstow town and siting 146 houses, a care home and a hotel will make the roundabout totally unworkable. There are already often unpredictable queues of traffic at the bottom of Pwllmeyric Hill and St Lawrence Road as far as the Race Course roundabout.

It has been reported that the hotel may be 80 bed and possibly the care home the same. This means a total of nearly 300 residents located in a totally inappropriate location.

If this “madness” persists then at least the entrance and exits from the site should join up with the other houses opposite the hospital so that they come out and go in near the traffic lights close to the hospital on St Lawrence Road. However, anyone who lives in the area knows that having a development here is totally unworkable.

Land has been reserved on this site for improvements to High Beech roundabout. However, it should be a site-specific requirement and contingent upon those improvements being in place using this reserved land prior to any house building development. Otherwise, no building should go ahead but in any event developments in Chepstow need to be taken out of the RLDP.

Both the previous Bayfield site and the Mounon Road site should not be developed as Chepstow is unable to take any more development due to traffic congestion. However, a major developer (Barratts/David Wilson homes) have indicated in a letter to all Councillors emailed prior to the County Council meeting on the 24th of October 2024, that on a traffic light assessment that Bayfield is preferable, and it is a further distance away from the roundabout. Barratts/David Wilson gave 5 green, 1 red, 1 amber assessment for the Bayfield site and 2 green, 4 red and 1 amber for Mounon Road site. The Bayfield site was the original site for Chepstow and only replaced by the Mounon Road site later in this RLDP.

In the past the Mounon Road site failed to be developed by Taylor Wimpey for a number of planning reasons which still apply today- green wedge, gateway to Chepstow and Wye Valley, setting of historical building and failure to pay the section 106 agreement.

Even with infrastructure improvements this site could not be supported as it is destroying the green wedge between Pwllmeyric and Chepstow. The local road and health infrastructure cannot support more houses in Chepstow at either the previous Bayfield site or the Mounon Road site.



This site or the Bayfield site should not be supported without all the necessary infrastructure being put in place first which needs a Chepstow bypass, substantial improvements to the High Beech roundabout and M48 links.

Further housing in Chepstow will add to the pollution concerns in the Chepstow air quality area at Hardwick Hill, this development will add to that air pollution.

In terms of air pollution, the national nitrogen dioxide permitted levels are 4 times higher at 40 level than the world health organisation levels at 10. New cars are being fitted with measurements for nitrogen dioxide and PM levels at WHO rates, and this will lead to residents calling for much lower levels of pollution. The WHO levels are already exceeded for nitrogen dioxide in both Pwllmeyric and Chepstow.

The Planning Policy Wales edition 12 states in paragraph 6.7.2. as follows.

6.7.2 National air quality objectives are not 'safe' levels of air pollution. Rather they represent a pragmatic threshold above which government considers the health risks associated with air pollution are unacceptable. Air just barely compliant with these objectives is not 'clean' and still carries long-term population health risks. Nitrogen dioxide and particulate matter, which are the pollutants of primary national concern from a public health perspective, currently have no safe threshold, defined and therefore the lower the concentration of those pollutants the lower the risks of adverse health effects. It is desirable to keep levels of pollution as low as possible."

It is therefore desirable not to have these developments in Mounton Road/Bayfield or Caldicot East (North Portskewett) as they will add to the traffic congestion at the High Beech roundabout and the A48 Pwllmeyric as drivers travel to the motorway junction at Chepstow to commute to Bristol/Cardiff and Newport.

Local people do not believe that this is to provide affordable housing for local people but will just make Chepstow even more of a congested commuter town. None of the policies on affordable housing even refer to people with a local connection being given priority even though the argument is meant to be based on providing affordable housing for those already locally waiting for it.

Land West of Redd Landes- Shirenewton-HA18-objection

This site is outside the village boundary and would substantially extend it.

This is what was said in quote marks at the Preferred Strategy consultation phase on the high-level candidate site assessment for this particular site and there is no explanation as to why this has changed:



“The high- level candidate site assessment states that the site is surrounded by the indicative Green belt in Future Wales Plan 2040 “.

Therefore, development should not take place in accordance with Planning Policy Wales Edition 11 pages 38 to 41.

The Habitats regulation assessment (from the information supplied by a resident at the County Council on the 12th of December for Monmouth which also applied to the Shirenewton site) on bats indicates that a suite of bat surveys(e.g. bat activity surveys, roost emergence surveys) will need to be undertaken between April and September. The planning application will likely need to be assessed through a project-level Habitats regulation assessment. However, no mention is made of the bat surveys and the need for a Habitats regulation assessment in the policy or the detriment of proposing this site in the first place. The reported information from the resident looking through thousands of pages included a number of sites including both Shirenewton and Monmouth.

In addition , a major concern with this site in the village of Shirenewton, is the sewerage infrastructure being unable to support it.

The main sewerage pipe covering the villages of Shirenewton, Mynyddbach, Moun-ton, Pwllmeyric and Mathern has not been properly repaired despite pipelining works and efforts over the last 6 years in a phased approach despite 495K being spent.

The main sewerage pipe runs across a field in Pwllmeyric which has a manhole cover surrounded by bales of hay because of the sewerage leakage into the field and into Moun-ton Brook when there is heavy rain.

Despite pipelining and other work over the last 6 years there is still sewerage overflow when there is heavy rain. The previous landowner informed me that the pipe has been defective for the last 20 years and is too small, possibly installed in the 1960s.

I have been having regular meetings with Welsh water over the last 5/6 years every 3 or 4 months and the participants are exasperated that this main pipe is still leaking human sewerage from 4 manhole covers and has not been repaired.

Prior to my time as a county councillor for Shirenewton ward I understand that there was a moratorium on house building until a new pump was installed at St Tewdrics area in Mathern which was meant to solve the problem but has not done so. There is water infiltration into this main sewerage pipe from under the brook.

It means that adding 26 houses to this main sewerage pipe would result in even more sewerage leaking into this field which has a public right of way with environmental health concerns for walkers with dogs and/or children who may come into contact with human sewerage leaked from the bales of hay when the field floods.

The reality is that the main sewerage pipe needs to be replaced but instead the water board have been attempting to repair it but despite years of efforts have failed to do so.

Hence the sewerage infrastructure is inadequate to add any extra housing to it unless the main sewerage pipe is properly repaired or replaced.

There needs to be a site-specific requirement that no development should take place until



the main sewerage pipe is fully repaired or replaced.

Building here is contrary to Planning Policy Wales Edition 12 which states as follows:

“.Capacity of Water Supply and Sewerage/ Drainage Infrastructure

6.6.9 The planning system has an important part to play in ensuring that the infrastructure on which communities and businesses depend is adequate to accommodate proposed development. The adequacy of water supply and sewerage infrastructure should be fully considered when proposing development, both as a water service and because of the consequential environmental and amenity impacts associated with a lack of capacity. “

Welsh Water in their presentation to the Place Scrutiny Committee on the 5th of December in the Supplementary agenda indicated that this main pipe had 4 manhole covers leaking sewerage when the water table rises and that the flow rate is 3 times the capacity of the pump. Committee members thought that it was medieval for the main pipe to use bales of hay to soak up the sewerage. The answer in the slides was that they would allow 26 further houses to add to a broken main pipe which they have never managed to repair in the last 6 years on the basis of no detriment. In other words, some minor repairs may be completed to say that it is no worse than it has been for the last 20 years. That is a totally unacceptable and irresponsible response. No further housing should be added to the main sewerage pipe until either it is properly fixed, or the main pipe replaced.

It would be difficult to fix it as the main water infiltration is from the pipe under the Brook not from the 32 cross connections in Shirenewton. It is obvious that the sewerage infrastructure is inadequate and contrary to PPW 12 and because of its environmental and amenity impacts associated with a lack of capacity which pollutes both the Brook and the land with a public right of way and endangers dogs and children who may suffer serious ill-health as a result of touching or ingesting human sewerage .

THERE NEEDS TO BE A MORATORIUM ON ANY NEW HOUSING DEVELOPMENTS BEING ADDED TO THE MAIN SEWAGE PIPE IN THE SHIRENEWTON WARD FOR THE VILLAGES OF SHIRENEWTON,MYNYDDBACH, MOUNTON, PWLLMEYRIC AND MATHERN UNTIL THIS MAIN SEWAGE PIPE IS PROPERLY FIXED OR REPLACED TO DO OTHERWISE IS IRRESPONSIBLE OF BOTH THE WATER BOARD AND THE COUNCIL.

The housing site is close to the conservation area and needs to ensure that landscaping from the existing housing at Redd Landes and the road and materials used ensure that the conservation area is respected and high quality materials such as those on the more newer houses in Shirenewton village at Mouton Court site are used, albeit that the site should not be developed in the first place because of the inadequate sewerage infrastructure and other issues.

In addition , the high density of housing is out of keeping with the village and the conservation area as this street consists of low-density single housing. Local objections



mentioned so far, include the impact of the level of housing along this small historic village central area. Traffic concerns relate to speeding, potential conflicts with the use of heavy agricultural vehicles in the field opposite and the road safety concerns due to the narrow main road in the village that it will join which is without pavements and already puts pedestrians at risk. Red Landes itself was required to respect the spacing of the houses adjacent in view of this being in a conservation area.

The village school is already oversubscribed, the bus service is extremely limited, with buses running every 3 hours or so. There is no shop or medical facilities, so residents would require a car. The site is proposed to be 50% affordable housing, and it is not clear whether or not that would be affordable for all.

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

It is no good suggesting a 2-metre footway on the northern side of Route R122 Earlswood Road over the site's frontage linking to the existing footway at Redd Landes when the rest of the main street through Shirenewton has no pavements. (See page 146 of the Habitats regulation assessment).

In summary, the site is in the indicative green belt, contrary to the Future Wales 2040 plan, it has an inadequate sewerage system, it is out of keeping with the conservation area and will add significant traffic and road safety concerns, it also appears to be in an area of protection for bats, has no mention of a habitats regulation assessment or project surveys of bats as required by a Habitats assessment.

Land to the East of Caldicot/North of Portskewett-HA2-objection

This strategic site of 770 houses is to the East of Caldicot (North Portskewett) and virtually all of the sites in the Caldicot/Severnside area will impact the A48 Pwllmeyric as traffic from these sites will travel to through Chepstow to meet the congestion at High Beech roundabout to travel to the junction of the motorways to Severn Bridge to Bristol and the M48 to Newport and Cardiff.

The road and health infrastructure is at breaking point and cannot take any more houses. Any traffic problems already cause chaos in the area. If the Severn Bridge closes there are 2 hour delays at Magor. If there are any road works in Chepstow such as closure of St Lawrence Road in January/February 2023 and road works on Hardwick Hill on the 31 October 2024, then it takes 1 hour to get 1.7 miles from Pwllmeyric to Chepstow.

The plan is simply unworkable and will lead to no-one wanting to live here because of it taking so long by road to get anywhere.

It will also cause significant air pollution as Chepstow on Hardwick Hill has worse air quality than Bristol. The idea of the overdevelopment of a narrow band in the South of the County for development simply will not work.



The chances of a Chepstow bypass , significant improvements to High Beech roundabout Chepstow and an M48 link are years away in view of the anti-car Welsh Government policies. The active travel measures will not assist as a recent study by Audit Wales found that nearly £220 million had been spent but no improvement in walking and cycling rates. In any development there will be at least 1 or 2 cars per household and even if public transport improves the buses will still be stuck in the traffic queues. The EV charging may improve the pollution side but will not stop the traffic queues.

<https://www.audit.wales/news/welsh-government-active-travel-ambitions-long-way-being-achieved>

There are no active travel measures between the villages and the town of Chepstow as the programme is concentrated elsewhere and the legislation on this was about improving active travel in the town, not between the villages and the town or in the villages. It means that there is no alternative but to increase traffic via the increased use of the private car.

The A48 Pwllmeyric is already too dangerous to walk into Chepstow due to the volume of traffic, the narrowness of the pavements which in places cannot be widened due to the width of the road and has been assessed by the council's road safety officer/ transport officers as unsafe for school children and would in my opinion be too dangerous to cycle on. Hence car travel is the only option here.

Please see comments on air pollution under the Mounton Road site which equally apply to this site.

The houses proposed in this strategic site do not take account of all of the development proposed in Caldicot and the Severnside area from the previous LDP and from candidate sites here and in Chepstow and surrounding area. All of these sites from Caldicot(Severnside) to Chepstow and surrounding area are in a close proximity to each other and the RLDP does not make it clear that it is concentrating development in a very small area in the South of Monmouthshire. Caldicot is only 5.8 miles from Chepstow and the village of Pwllmeyric is roughly in the middle towards the Chepstow side, with Severnside close to Caldicot. Whereas there is much more of a distance of 17.5 miles between the main towns of Monmouth and Abergavenny in the North of the County.

Development in the North of the County-how would you like the plan to be changed

The previous consultation answers given indicate that the North rather than the South of the County is able to sustain more development due to the significant sums spent on developing the Heads of the Valley Road infrastructure, which is lacking in the South of the



County,

There has already been substantial development in the South of the County in the last LDP which is still in the process of being built and 80% of development is already in the South.

There should be no development in Chepstow due to the lack of road infrastructure as residents who commute into Bristol from both Shirenewton and Chepstow already have to leave at 6am to avoid the very long daily queues at the bottom of St Lawrence Road near the racecourse and at the bottom of Pwllmeyric Hill as by 7.15am the High Beech roundabout is highly congested.

There should be no development in Shirenewton or the Shirenewton ward which covers the villages of Shirenewton, Mynyddbach, Mounon, Pwllmeyric and Mathern due to the inadequate Sewerage infrastructure. This totals 146 houses at Mounon Road Chepstow and 26 houses at Shirenewton. The RLDP is for 5,400 houses + 15% flexibility making it 6,210. However, the last LDP only had a flexibility of 10% and so if the same flexibility was used in this RLDP this would amount to 5,940, if these 172 houses were taken out of the plan then this would still mean 6,038 left, which would be approximately a 12% flexibility.

In any event it is highly questionable whether such a high target is achievable as in the current LDP plan an average of only 300 houses were built a year amounting to 3000 for the plan period of the current LDP meaning that there was a shortfall of 1500 houses for the 4500 proposed. Hence the build rate for this RLDP is over ambitious and unrealistic.

The Mounon Road site also should not be used for a care home and hotel which should be located elsewhere.

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

The objection to these policies centres around the fact that it is only policy E1 that mentions the use classes.

Class B1-Office/Research and Development/ Light Industry



Class B8-General Industry

Class B8- Storage and Distribution.

The policies for rural areas in the above policies need to make it clear that only classifications such as B1 are permitted in rural areas. Rural areas often do not have the infrastructure to accommodate other types of use due to narrow one-track roads which could not take the large vehicles used for general industry/ storage and distribution and would compromise the free flow of traffic as a result. In addition, in many rural areas there is inadequate water and sewerage infrastructure to support such agricultural diversification. General industry is also unsuitable for these areas due to not being part of the main highway routes and lacking the capacity for use by HGVs or larger types of vehicles.

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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

E1d- Land at New House Farm Industrial Estate Chepstow

This area of land used to be within the Mathern community council area but with the boundary changes is no longer. However, there is a mound between the Industrial Estate and the Mathern area and there is a need to ensure that any developments in terms of lighting and pollution do not impact the residential area of the village of Mathern. This needs to be considered in relation to any development in this area particularly as the area of land is said to be expanding.

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

Is your representation in support or

Support:



objection?	Objection:	Objection T1 needs strengthening.
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. T1-New or Extended Tourism Accommodation and Facilities in the Open Countryside Point J) needs expanding Point j) of T1 Have the necessary infrastructure such as highway capacity which does not restrict the free flow of traffic along single-track roads with few passing places /restrict the water and sewerage facilities of nearby residential properties by for example, reducing water pressure along single pipe water facilities which more isolated rural areas have to contend with.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. It is important that the existing supplementary planning policy on parking is maintained which is one space per bedroom up to a maximum of 3 spaces for 3 bedrooms or more, as well as visitor parking places. Many rural areas do not have access to frequent and readily available public transport and Monmouthshire is a rural county. In addition, even in urban areas there is a need for developments to provide sufficient off-street parking. Estates are built on the basis of the		



manual of streets which does not allow for roads to be wide enough to allow for the free flow of traffic when there is on street parking due to a lack of off-street parking in development plans. This leads to a dangerous situation whereby residential owners and visitors park on the pavement or halfway on the pavement leading to pedestrians with prams having to go out into the middle of the road and compromising road safety.

In addition, for the elderly population active travel in the form of cycling or walking is not an option when they have difficulty even walking and so are reliant on private car or infrequent public transport. The evidence in this RLDP is about the high number of older residents and the increase in the age of the population of Monmouthshire residents which is a national issue of an aging population and one prevalent in many rural areas of both England and Wales. These active travel policies demonstrate age discrimination where private vehicles are necessary contrary to the public sector duty on Equality.

For example, in my area there are pensioners in Mathern who rely on the once-a-week Saturday shoppers' bus which comes into the village itself and they feel unable to cover the walking distance from the village to the A48 Pwllmeyric to get buses on a more regular basis.

The A48 Pwllmeyric is too dangerous to either walk or cycle on due to the volume of traffic and the narrowness of the pavements, being close to the road and only available on one side of the road where the draft of close vehicles can be felt.

According to a report by Audit Wales, the Welsh Government's policy of active travel has failed to engage the people of Wales with fewer participating now than in 2018, despite nearly £220m having been spent encouraging them to take part. Hence the Audit Wales evidence does not support the policy hierarchy in this RLDP.

In addition, the transport policies as well as the strategic site policies fail to make the development of sites contingent on highway infrastructure improvements at the same time as they did in relation to the current LDP for the Fairfield Mabey site at Chepstow. Chepstow badly needs a Chepstow relief road and High Beech roundabout improvements prior to any developments. The Chepstow relief road was a requirement of MCC supporting the Forest of Dean RLDP and should have the same requirement for this plan.

There is little in the RLDP report about the significant developments in the Forest of Dean area which will substantially impact the town of Chepstow and surrounding area and with the latest targets in England may have an even greater impact.

The transport situation and the problems with transport not being sustainable in the South of the County due to considerable traffic congestion means that the transport policies are not sustainable and need a radical rethink.

The RLDP does not address the need for more road infrastructure prior to any more development.



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

Is your representation in support or objection?

Support:

Objection:

Objection as policies need strengthening

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 policies here need to be greatly strengthened as the town centres particularly Chepstow are being impacted by developments outside of the town centre and the town has a considerable number of empty premises even one empty travel agency shop which was recently raided by the police for being used for growing cannabis.

The garage near the High Beech roundabout used to have a large shop with horse tackle and such like. It was replaced by tools station, Greggs and Subway. It has caused significant traffic congestion due to car drivers turning right into this service station and is frequently used as out-of-town eating places to the detriment of the town centre. The town centre still has a Greggs but it is far more convenient to stop at the one near the garage as there is free parking available. When I asked about it I was told it came within the same planning use as the other horse tackle shop. There should be some way of preventing this type of thing happening, whereby one shop premises ends up being 3 and creating greater demand. In addition, the McDonalds being proposed for the New House Industrial estate Chepstow should be in the town centre instead.

It is hoped that policy S14 would deal with this situation on new or enhanced or does the wording need strengthening?

RC1- Central Shopping and Commercial Centres

Strengthen the policy in d } to say as follows:

d) The loss of car parking will not be permitted.

RC1- no comment

RC2- no comment



RC3-no comment

RC4-Change g) to 250sqm and strengthen the policy in order to protect the town centre from out-of-town developments which can totally ruin town centres.

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

Is your representation in support or objection?

Support:

Objection:

Objection needs amending

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.

S15- Community and Recreation Facilities- the policy does not include the list of such facilities and so may make the policy weaker?

C11-Retention of Existing Community Facilities

The policy needs to make it clear that rather than see old pubs being left to deteriorate so that the owners can get planning permission for residential. Residential use for a pub or its car park should not be permitted. If the pub has been marketed the policy needs to allow the community to purchase and run it as the first option and not allow any residential use. It should be a case of if it has been marketed unsuccessfully then there needs to be evidence it has been offered first to the community to run the pub. Centrally based pubs need to be retained and the argument that there are pub facilities which are on the outside of the centre should not be used, similar to the town centre or in this case village centre first approach.

C12- There is no reason why all new housing estates should not include allotments to allow for food resilience for local communities and the health and well-being of growing produce.

C13- Remove b) as this allows for a lowering of green space provision which is undesirable and the more available the better, this should not be permitted.

C14-The policy clearly states it should not be permitted and some of the other policies need to adopt a similar approach.



**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.

S16- "won" used twice not clear what it means?

S17-Sustainable waste management- no comment

M1-no comment

M2-Remove i) as what might not be able to be commercially extracted today may well
change tomorrow with new technologies. The policy provides weak protection for
safeguarding minerals.

M3- no comment

W1- ii) ? It is not clear what this means or reason for it?

W2- Objection as this may cause environmental pollution in terms of ammonia, phosphates
and nitrogen. There is no mention here of the need for an environmental impact
assessment. See the case of Finch versus Surrey County Council

W3-Strong Objection to a waste facility at Newhouse Industrial Estate Chepstow as the
mound is close to the village of Mathern . There is already congestion at High Beech
roundabout and having a waste site here will cause additional congestion at the next
roundabout for entering and leaving the motorway junction at Chepstow.



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

Is your representation in support or objection?

Support:

Objection:

Objection

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

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

Habitats Regulation Assessment

No account has been taken of the comments in the Habitats regulation assessment in relation to Bats and the sites it impacts.

The ammonia concentrations mentioned on page 2 of the Habitats regulation assessment are at odds with the reports from the Woodland Trust in relation to ancient woodlands for the recent expansion of a poultry unit for a farm in Shirenewton which mentions being at critical load. Ammonia damages trees.

Policy NR1 – Nature Recovery and Geodiversity and its supporting text in paragraphs 11.10.2 – 11.10.8 under the heading International/National (Statutory) Sites and Protected Sites and Species with specific reference to Functionally Linked Land in paragraph 11.10.5, but without providing specific details of the need for bat surveys, survey seasons and the potential need for mitigation (page 4)

Fails to cover the need for an environmental impact assessment and a habitats regulations assessment in relation to poultry sites and the environmental pollution from them of ammonia, phosphate and nitrogen.

The development sites have an amber as opposed to green rating due to the Potential impact pathways are present: • Atmospheric pollution • Loss of functionally linked land • Water quality • Water quantity, level and flow (see pages 118 to 146 for all the development sites in this habitats assessment).

Page 18 mentions the threats to the Severn Estuary from water pollution, the Mounon Brook is being polluted by human sewerage from the broken pipe, it then flows into the Nedern and then joins the Severn Estuary to the sea so it pollutes the Severn Estuary first. It will not go to the Nash treatment centre before the Severn Estuary as this is from sewerage leakages.

It states on page 27 that a critical level for nitrogen oxides for NOx has been set at 30ug/m3



for all vegetation types but the national level has been set at 40ug/m3 and the World Health organisation level is set at just 10ug/m3. In other words, the national level for pollution for humans at 40 is higher than what is considered a critical level for all vegetation types. All areas of Chepstow and Pwllmeyric are already above the WHO levels.

Page 57 states that There are also several policy mechanisms through which the Severn Estuary SAC could be protected, for example by introducing the following wording into a policy addressing the protection of European sites in Monmouthshire: 'Any development proposals that would increase visitor access to sensitive habitat features in the Severn Estuary SAC, SPA and Ramsar site, especially on to saltmarsh and mudflat habitat, will not be supported unless no adverse effect on the integrity of the sites could be confirmed.' Nothing in the policies on this suggestion in the habitats assessment unless missed it.

Integrated Sustainability

In relation to the sites at Chepstow the integrated assessment indicated that the Bayfield site which the Moun-ton Road site replaced had less of a negative impact, a similar conclusion being reached by Barratts/David Wilson homes representations.(see pages 43 to 47). Page 58 provides the Council's reasons but does not provide an independent assessment of the 2 sites and its own evidence on negatives suggests otherwise than the council option.

However, none of the sites in Chepstow should be developed due to the traffic congestion already present. To suggest that the sites would have no impact on transport and movement is unacceptable and it is obvious that no account has been taken of the increase in traffic at High Beech roundabout and its lack of capacity since the Severn Bridge tolls were removed.

The diagram at page 64 shows the unacceptable concentration of development in the South of the County and the concentrated distance between them and the primary settlements in the North of the County which are a much greater distance from each other. This demonstrates how the spatial development strategy is unacceptable. Monmouth to Abergavenny is 17.5 miles away. Severnside-Caldicot- Chepstow are all within 10.9 miles of each other with only 5.8 miles between Caldicot and Chepstow with Pwllmeyric towards Chepstow.

8.4.25 It is also considered that cumulative positive effects are likely in relation to economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.

However, the development is not concentrated in the North of the County which has the new Heads of the Valleys roads.

The integrated sustainability assessment recognises the air pollution issue when it says at 8.9.2.However, as a Tier 1 settlement, Strategic Policy S2 (Spatial Distribution of



Development - Settlement Hierarchy) states that around 829 dwellings will be directed to Chepstow during the plan period, which has the potential to exacerbate NO2 levels within the AQMA through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. This includes strategic site allocation Land at Mounon Road, Chepstow (Policy HA3), which is located in the northwest of Chepstow close to the A466.

The integrated sustainability assessment seems on the whole to talk about the plan in positive terms but it did the same for the previous one and no longer seems to suggest as it did before at the earlier stages of the RLDP that the development should be in the North of the County because of the indicative green belt in the Future Wales 2040 plan. This questions the independence of such assessments which are commissioned by the local authority.

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):		



Fails test 1

Not in conformity with Future Wales 2040

It is not in conformity with the Future Wales 2040 as Monmouthshire is not a growth area.

In relation to the Shirenewton site of 26 houses the preferred strategy consultation indicated that the candidate site was in the indicative green belt of the Future Wales plan 2040, and nothing has changed since that assessment.

It does not support the wellbeing goals as it will lead to extra traffic congestion impacting pollution levels in the South of the County and the health and wellbeing and the quality of life for existing and future residents, not only due to the lack of infrastructure but also because of the time it will take to travel only a couple of miles to get anywhere. This will cause unacceptable delay, stress and reduce the health, wellbeing and quality of life of existing and future residents as a result.

The RLDP is not in consistent with other plans as it has not taken account of the impact of all the house building in the Forest of Dean which will have a great impact on Chepstow and the South of the County. It is likely that this impact will be even greater as the FOD are likely to have an even greater housing target set.

Monmouthshire could not support the FOD plan without a Chepstow relief road but MCC in this RLDP have not applied the same rules to this MCC RLDP.

The vision in the plan will damage the tourism industry which is an important part of the Monmouthshire economy.

Page 256 to 261 covers joint working with other authorities with table 1 including the Welsh first and then the English authorities. However, the emphasis is upon the Welsh Authorities as indicated in table 2 on regional collaboration. It also recognises how many people are moving to Monmouthshire and commuting to Bristol. For Chepstow the Forest of Dean has most impact on the town and it seems as if the regional collaboration is lacking in relation to the Welsh/English authorities.

Whilst table 1 states that Monmouthshire will continue to work collaboratively with the Forest of Dean as we progress with our respective RLDPs to ensure that any cross-boundary issues are fully considered. There is the danger that this collaboration is not at the level it should be.

Fails test 2

The plan is not appropriate for the area in the light of the evidence as the level of traffic congestion that will result will make both existing and new residents' life unbearable. It is not appropriate to continue adding more and more housing without the infrastructure improvements in roads, health and general facilities and water and sewerage infrastructure being inadequate and proposing houses where reliance is placed on bales of hay to soak up the human sewerage.



Adding an 80 bed hotel, a care home and 146 houses right next to High Beech roundabout Chepstow which is highly congested is nothing short of madness, in a location which is a Gateway to Wales and just creating urban sprawl, together with the highest grade agricultural land being used and ruining a historic building, which was part of an unsuccessful planning application on the same site by Taylor Wimpey. Barratts/Wilson Homes have also made comments against the site. It ignores the ratings on sites in Chepstow from the integrated sustainability assessment. However, there should be no new developments in Chepstow either at Bayfield or Moun-ton Road which should be taken out of the RLDP.

It is not supported by robust evidence as it ignores the water and sewerage infrastructure and health challenges. Since affordable housing is the top priority it ignores other important requirements for new additional housing. In the South it ignores the very significant pressures from the house building in the Forest of Dean on Chepstow. It is contrary to PPW12 on inadequate sewerage capacity for any developments in the villages in the Shirenewton Ward including Shirenewton itself,

It will not deal with the demographic issue in the same way the last plan did not as rural areas tend to have older populations, and the national picture is of an aging population so where will the young people come from? The younger population is always on a demographic basis attracted to city areas because of the jobs there. Monmouthshire is already a commuting area for Bristol, Newport and Cardiff. It will not meet local needs as the general public view is that it is just building homes for Bristol people who will find it difficult to get there when a 30-minute journey without traffic can already take 1 to 2 hours. Option 3 would be the best option. Building bungalows would help the local elderly population to downsize to provide housing for families within the existing housing stock and use of the existing housing for affordable housing and for improving demographics rather than ruin the tourism economy of Monmouthshire.

It is not logical and demonstrates the problems of desk top site surveys which have a lack of local knowledge about Chepstow, Shirenewton Ward and Monmouth.

Fails test 3

It is not effective, and it cannot be implemented, the best rates for affordable housing due to viability issues are much lower than suggested here and even if achieved will make the development unacceptable because of the need to contribute to other requirements for developments.

The house build rate proposed in the tables on it are not realistic, in the last plan 3000 houses were built as opposed to the 4500, meaning an average of 300 houses per annum.

For example, recently a Performance and Overview Committee report from planning indicated in the supplementary agenda on the 19th of November 2024 on page 8 that only 291 residential units were completed of which 26% were affordable. This RLDP covers 2018 to 2033 a period of 15 years, at a build rate of on average 300 per year this leads to $300 \times 15 \text{ years} = 4500$, hence option 3 is the more realistic one. Table 3 on anticipated completion build rate calculation at the end of the RLDP report leading to 6210 housing completions on average of 414 completions per year is totally over-exaggerated and



unrealistic as this build rate has never been achieved in Monmouthshire.

In option 3, the Welsh Government Prescribed 10-year Past Build Rate (based on 10 years to 2020) (excluding BBNP Growth and excluding AH-led strategy). This gives a dwelling requirement of 4,280 dwellings over the Plan period, as detailed in the Growth and Spatial Options Paper of September 2022.

Whilst, it is appreciated that a considerable amount of work has gone into this RLDP by officers over the last 5 years. There are still considerable concerns about this RLDP as illustrated by the fact that 21 County Council members voted in favour of this RLDP and consultation and 20 against it in the full council meeting on the 24th of October 2024.

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:	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?

It is likely to negatively impact the Welsh language as new residents and their children are likely to be commuters to Bristol and therefore will not have had any Welsh language teaching in schools.

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?

Follow option 3 as detailed in the answer to the question on soundness.





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.

2484

Councillor Jane Lucas

Archived: 14 March 2025 15:44:21
From: [MCC - Planning](#)
Sent: Tue, 17 Dec 2024 10:44:40
To: [MCC - Planning](#) [MCC - PlanningPolicy](#)
Cc: [REDACTED]
Subject: FW: Objection to Site CS0270
Importance: Normal
Sensitivity: None

FAO. Planning Policy: planningpolicy@monmouthshire.gov.uk

From: [REDACTED]
Sent: 16 December 2024 17:00
To: MCC - Planning <Planning@monmouthshire.gov.uk>
Subject: Objection to Site CS0270

Dear Sir/Madam,

I object to the proposed development for the following reasons.

1. The effect on the Bats, and it being far to close to the SSSI where they roost. They need the fields to feed. 1km distance from SSSI is watering down the Councils own recommendations. This reason alone should stop this Candidate Site.
2. Too close to ANOB or Living landscapes, it will be seen with no protection to the landscape, and the fact it can be seen from the ANOB it should be taken as part of it.
3. Traffic, it will created even more congestion onto Dixon Roundabout, entrance not being 100m from and already congested area, causing further air pollution, not meeting WHO guidelines.
4. River pollution, far too close to the River Wye, where Monmouth's drinking water is taken from, and the houses will be built above the extraction point for drinking water.
5. Jobs will be at the other end of town, if any at all, otherwise just creating a commuter town.
6. I don't believe that 50% affordable is achievable, and therefore totally un-realistic.

Kind regards,

[REDACTED]

[REDACTED]

2489

Councillor Lisa Dymock

View results

Respondent

597

Anonymous

99:48

Time to complete

Part 1: Contact Details

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

1. Title *

2. Name *

3. Job Title (where relevant)

4. Organisation (where relevant)

Monmouthshire 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.

*

1. Strain on Infrastructure

- Road Network Congestion: The B4245, a major transport route, already experiences significant congestion, particularly during peak times. Increased traffic from 770 additional homes will exacerbate this problem.
- Public Transport Gaps: Limited bus and rail services, especially around Severn Tunnel Junction, could fail to meet the demand of new residents, leading to further car dependency.
- Healthcare Services Overload: Local GP surgeries and healthcare facilities are already at capacity, and the new development would add significant pressure.
- Education Shortfalls: Both primary and secondary schools in Caldicot and surrounding areas are near capacity, risking overcrowding and reduced education quality.
- Utilities and Flood Risk: The additional strain on water, sewage systems, and flood-prone areas poses environmental and service risks.

2. Environmental Concerns

- Loss of Green Spaces: Development will lead to the loss of agricultural land and green fields, impacting biodiversity and local access to natural areas.
- Carbon Emissions: Without sustainable transport solutions and renewable energy integration, the development risks increasing local carbon emissions.
- The loss of a large proportion of the Gwent Levels in this area.

3. Community Integration and Character

- Erosion of Village Identity: Large-scale developments could undermine the character and identity of Portskewett and its surrounding communities.
- Limited Employment Opportunities: Without clear job creation strategies, the area risks becoming a commuter hub, increasing reliance on the already strained transport network.
- Social Integration Challenges: The sudden increase in population risks creating a disconnected development due to its proposed location; its cut off from Caldicot due to the flooding and Portskewett by B4245

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.

*

1. Overly Ambitious Housing Targets

- The RLDP proposes a high growth strategy with significant housing developments, such as the 770 homes planned for Caldicot East. These targets appear overly ambitious and it seems this area is being saturated

2. Mismatch Between Housing Growth and Infrastructure Capacity

- The growth strategy fails to align with the capacity of existing infrastructure, including roads, schools, healthcare facilities, and public transport.
- Without substantial upgrades to critical infrastructure like the B4245 and Severn Tunnel Junction station, the increased population will cause severe congestion, longer commutes, and strain on essential services.
- The RLDP does not provide sufficient detail on how and when these infrastructure improvements will be funded and delivered.

3. Lack of Economic Growth to Support Population Increase

- The strategy focuses heavily on housing growth without a corresponding emphasis on local economic development.
- There is no clear plan to create jobs or attract businesses to the area apart from a small area of employment land, encouraging more residents to move to Monmouthshire and use as a commuter region dependent on Newport, Cardiff, and Bristol for employment.
- This imbalance undermines the sustainability goals of the RLDP and fails to address the need for self-sufficient communities.

4. Environmental Risks and Unsustainable Development

- The growth strategy puts environmentally sensitive areas, such as the Wye and Usk catchments, at risk of further degradation due to phosphate pollution and increased water runoff from large-scale developments.
- The focus on greenfield development, such as in Caldicot East, leads to the loss of agricultural land and natural habitats, impacting biodiversity and local ecosystems.
- The plan lacks robust measures to ensure that housing growth aligns with Monmouthshire's net-zero carbon targets.

5. Lack of Flexibility and Resilience

- The growth strategy relies heavily on projections and assumptions that may not materialise, such as regional economic growth and infrastructure funding which may never materialise.
- A more phased, incremental approach would allow the strategy to be more responsive to local needs and realities.

6. Insufficient Public Engagement and Transparency

- The growth strategy has faced criticism for not adequately incorporating feedback from local residents and stakeholders.
- Concerns raised during public consultations about infrastructure, environmental risks, and the scale of development have not been meaningfully addressed in the RLDP.
- The lack of transparency about how housing targets were set and how growth will be managed undermines public confidence in the plan.

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.

*

1. Overconcentration of growth in one area

- The spatial strategy disproportionately concentrates development in urban areas like Caldicot, Chepstow, and Monmouth while neglecting smaller rural settlements. This approach risks exacerbating regional inequalities by prioritising growth in areas that are already better served by infrastructure, while smaller communities face further decline.
- By not allocating sufficient small-scale, sensitive developments in rural areas, the strategy misses an opportunity to support local services, retain younger populations, support our aging population, and sustain vibrant communities.
- A more balanced approach that includes incremental growth in smaller settlements would promote countywide development and prevent overburdening areas.

2. Environmental Concerns for Identified Growth Areas

- Greenfield development, particularly in Caldicot East (Portskewett), threatens biodiversity, agricultural land, and local ecosystems, which contradicts the plan's stated goal of responding to the climate and nature emergencies.
- Greater focus on brownfield sites and less environmentally sensitive areas would minimise ecological damage and align with Monmouthshire's sustainability objectives.

3. Limited Integration of Employment and Housing

- The spatial strategy does not sufficiently integrate housing growth with local employment opportunities. Most of the designated areas for housing, such as Caldicot East, are likely to become commuter zones due to limited job creation in the immediate vicinity, a small employment site will not address the need for 770 houses!
- This imbalance risks increasing car dependency, congestion, and carbon emissions, undermining the plan's goals of sustainable development and reducing climate impact.
- The strategy needs to better align housing allocations with employment land and ensure developments are part of mixed-use communities that reduce commuting distances and enhance self-sufficiency.

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

17. Would you like to comment on this question *

☒ Yes

☐ No

18. Is your representation in support or objection? *

- ☐ Support
- ☒ Objection

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

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

*

- Policy OC1 permits certain forms of development in the open countryside, but the criteria appear too broad and could lead to a gradual erosion of these areas. Allowing developments such as agricultural conversions or rural enterprise without stricter controls risks undermining the integrity and character of Monmouthshire's rural landscapes.
 - The policy should impose stricter conditions to ensure developments in the open countryside are genuinely necessary, sustainable, and minimize environmental impacts. Stronger safeguards are needed to prevent speculative developments disguised as "rural enterprise" from exploiting this policy.
 - Policy GW1 identifies Green Wedges as a tool to prevent urban sprawl and maintain the separation of settlements, but the policy lacks robust enforcement mechanisms to ensure these areas remain undeveloped. In high-pressure growth areas such as Caldicot East, the risk of encroachment into Green Wedges is hugely significant!
 - The policy should explicitly prohibit large-scale developments within designated Green Wedges and include stricter criteria for assessing any proposals that seek to modify these boundaries. This is essential to protect the distinct identity of settlements and preserve Monmouthshire's rural character.
- Policies OC1 and GW1 are not sufficiently aligned to provide a coherent framework for managing settlement form and protecting rural and semi-rural areas. While OC1 focuses on the open countryside and GW1 on Green Wedges, there is a lack of clarity on how these policies interact in overlapping areas, particularly near growing settlements. To ensure consistency, both policies should be strengthened to prioritise the preservation of the rural-urban boundary and require any permitted developments to demonstrate that they will not contribute to settlement sprawl or environmental degradation.

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

21. Would you like to comment on this question *

☐ Yes

☒ No

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.

*

- Funding and Delivery Uncertainty: Both policies lack clarity on how infrastructure projects will be funded and delivered in tandem with development. There is a risk of infrastructure delays, leading to strain on existing systems.
- MCC need to establish a transparent funding framework, including developer contributions, to ensure timely delivery of infrastructure.
- Neither policy sufficiently incorporates community feedback in infrastructure planning. This risks overlooking local needs and concerns, particularly in rural and semi-rural areas like Caldicot East. MCC need to listen to local people.

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.

*

- The RLDP sets ambitious targets for affordable housing as part of its overall growth strategy. However, there is limited clarity on how these targets will be met, particularly given the financial challenges faced by local developers and the lack of detailed funding strategies. Without sufficient funding, there is a risk that affordable housing commitments may be reduced or delayed.
The council should provide a detailed and transparent plan outlining how the affordable housing targets will be financed, delivered, and monitored.
- The proposed affordable housing units may not align with the specific needs of local residents. For instance, there is insufficient analysis of the demand for different types of affordable housing, such as social rental properties versus shared ownership schemes. This could result in housing that fails to address the needs of lower-income families or individuals.
- The addition of greater affordable housing will place further strain on already overstretched infrastructure, such as schools, healthcare, and transport services, particularly in high-growth areas like Caldicot East. Infrastructure upgrades need to be guaranteed and delivered prior to the construction of affordable housing to avoid overburdening existing services.
- The selection of sites for Gypsy and Traveller communities, such as the proposed Caldicot East location, raises concerns about suitability and integration with existing communities. Some of the proposed sites may lack access to basic amenities, such as healthcare, education, and public transport, limiting the ability of these communities to thrive.
- The lack of detailed engagement with local residents about the proposed Gypsy and Traveller sites risks fostering opposition and misunderstanding. Without proper integration and communication, these developments may face significant community pushback, leading to tension and social division.
- The council should engage in proactive, transparent consultation with both the Gypsy and Traveller communities and local residents to build understanding, trust, and support. During the call in the cabinet member dismissed the vast majority of contributions and only took onboard one person's views.
- RLDP does not provide sufficient detail on how Gypsy and Traveller sites will be managed or maintained over the long term. There is a risk of these sites becoming neglected or unsuitable if proper funding and governance are not secured.
- The process for identifying Gypsy and Traveller sites, including in Caldicot East, has been criticised widely for a lack of transparency. Residents have raised concerns that alternative, more suitable locations have not been adequately considered. The council should publish detailed criteria for site selection and be completely transparent.
- One significant concern is this will be the third similar site within one mile, this makes no sense and highlights serious questions about the fairness and balance of this decision. Gypsy and Traveller sites are required across the county like any housing, yet MCC are proposing an imbalance to one area.

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

29. Would you like to comment on this question *

☒ Yes

☐ No

30. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

1. Infrastructure Overload in Caldicot East (HA2)

- The allocation of 770 homes in Caldicot East (HA2) risks overwhelming existing infrastructure, particularly the B4245, which already struggles with congestion. Additionally, public transport options, schools, and healthcare services in the area are insufficient to support such a large influx of new residents.

2. Environmental Concerns and Loss of Greenfield Land

- The HA2 site in Caldicot East is predominantly located on greenfield land, resulting in the loss of valuable agricultural space and natural habitats. This is in direct conflict with the RLDP's commitment to sustainability and addressing climate and nature emergencies.

3. Risk of Social and Community Imbalance

- Concentrating such a large-scale development in Caldicot East could create social challenges, such as overpopulation relative to existing community facilities and difficulty integrating new residents into the existing social fabric. Additionally, the lack of mixed-use development risks turning the site into a commuter hub rather than a vibrant, self-sustaining community.

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

32. Would you like to comment on this question *

☐ Yes

☒ No

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

33. Would you like to comment on this question *

☒ Yes

☐ No

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.

*

Many of the proposed employment sites, including those under EA2 (protected employment sites), are located on or near environmentally sensitive areas. Increased development could exacerbate pollution, harm biodiversity, and contribute to higher carbon emissions, conflicting with the RLDP's stated sustainability goals. Employment site allocations should prioritise brownfield sites and include strict environmental protections to minimise ecological impact. Proposals must also incorporate renewable energy requirements and sustainable design principles. As advised during the drop in session by the planning team this could be an incinerator which would be incredibly inappropriate for site.

**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.

*

1. Lack of Detailed Implementation Plans (S13 and ST1)

- While Policy S13 and ST1 set broad goals for sustainable transport, they lack clear, actionable steps to achieve these objectives. For example, there is insufficient detail on how sustainable travel will be integrated into major residential developments such as Caldicot East. The council should provide a detailed implementation strategy, including timelines and funding commitments, to ensure that sustainable transport options, such as bus services, cycling routes, and walking networks, are delivered in tandem with housing developments.

2. Insufficient Emphasis on Public Transport Improvements (ST2, ST3)

- Policies ST2 (Highway Hierarchy) and ST3 (Freight) prioritise road and freight infrastructure without adequately addressing the need for enhanced public transport options. In areas like Caldicot, where car dependency is high, limited public transport options will continue to hinder efforts to reduce emissions and traffic congestion. The policies should emphasise improving bus and rail connectivity, including expanding service frequencies and providing better facilities at key hubs like Severn Tunnel Junction. Greater focus on park-and-ride schemes and integrated ticketing systems would also support modal shifts. These fail to address the role that Caldicot Station plays in supporting existing and proposed development, this station desperately requires funding to make this a safer better utilised service.

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

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.

*

Policies S14, RC1, and RC2 aim to support town and local centers, but they fail to address the ongoing decline of Caldicot Town Centre. Empty shopfronts, underused spaces, and poor visual appeal have made the town less attractive to both residents and visitors. Without targeted interventions, Caldicot risks falling further behind as a viable retail hub.

Caldicot Town Centre is in a state of decline, with empty shops, low footfall, and outdated infrastructure. While the RLDP's retail policies aim to promote vibrant commercial centers, they fail to address the specific challenges faced by Caldicot. Without targeted regeneration initiatives and stricter limits on competing out-of-town developments, the town's condition will likely deteriorate further, harming both residents and local businesses.

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

43. 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)**

44. 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?**

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.

*

While I accept the need for housing in Monmouthshire, the scale of the proposed development for Caldicot East (Portskewett) is excessive and unsustainable, it will place undue strain on local infrastructure and the surrounding community of Portskewett.

I strongly object to the council's misleading reference to the proposed development site as "Caldicot East" when it is clearly located within the ward of Portskewett, a distinct and vibrant community with its own unique identity and heritage. This mislabeling undermines the significance of Portskewett's role in the area and dismisses the concerns of its residents, who will bear the brunt of the negative impacts.

Furthermore, the RLDP will directly force the closure of the David Broome Event Centre, a longstanding and valued facility that has contributed to the local economy and cultural life for years.

These proposals will drastically alter the character of the area with an overdeveloped housing project that fails to respect the community's history or infrastructure capacity. These changes will irrevocably transform Portskewett—and not for the better—leaving residents to deal with the consequences of poor planning and misplaced priorities.

Very disappointing you do not have an option for Portskewett for where I live!!

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>

48. Do you consider that the Plan is sound?

*

☐ Yes

☒ No

49. 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)?

50. 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 RLDP proposals, as currently presented, raise significant questions about their soundness. A sound plan must be realistic, justified, and deliverable, yet the RLDP appears to fall short in several critical areas. The infrastructure necessary to support large-scale developments, such as the 770 homes proposed for Caldicot East, is not adequately addressed, particularly regarding transport, schools, and healthcare services. Environmental concerns, such as phosphate pollution and the loss of greenfield land, further undermine the plan's sustainability objectives. Additionally, the lack of robust economic strategies to create local employment opportunities risks turning the area into a commuter zone, increasing car dependency and congestion. While the RLDP outlines ambitious goals for housing and growth, its failure to align these ambitions with practical, balanced, and environmentally sound solutions suggests that it is not a fully sound plan in its current form.

Part 4: Appearance at Examination Hearing Sessions

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

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

51. 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

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

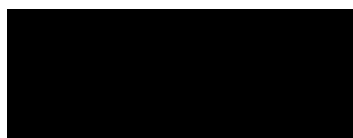
☐ Welsh

☒ English

Part 5: Welsh Language

53. 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?

54. 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?



2497

Councillor Paul Pavia

View results

Respondent

604

Anonymous

42:46

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)

Monmouthshire County 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.

*

Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

Infrastructure Limitations

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

Legal and Policy Compliance

Contradictions with Welsh Legislation: Several legal frameworks appear to be at odds with the RLDP's proposals, including:

- **Planning (Wales) Act 2015:** Focuses on sustainable development through balanced economic, social, and environmental considerations.
- **Environmental Air Quality and Soundscapes Act 2024:** Requires air quality preservation, which the development is seen as undermining.
- **Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017:** Calls for comprehensive environmental assessments, which critics say have been inadequately conducted or withheld from public review.
- **Wellbeing of Future Generations (Wales) Act 2015:** Requires long-term sustainability planning, which residents argue has been ignored.

5. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

6. Governance and Public Accountability

There is significant dissatisfaction with the perceived lack of transparency in the RLDP process. Residents criticise the absence of a publicly available Environmental Impact Assessment (EIA), which they argue violates both legal standards and public trust. They also criticise the navigability of the consultation survey; many felt it was not user friendly. The consultation process is also seen as insufficient, with concerns that the council has failed to meet public engagement obligations under Section 61W of the TCP Act 1990.

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.

*

Economic Sustainability

Local Economy Risks: While the development may create short-term construction jobs, long-term economic benefits are uncertain. There is a strong likelihood that new residents will commute to higher-paying jobs in nearby cities like Bristol and Cardiff, contributing little to the local economy.

Housing vs. Employment Balance: Many residents critical of the proposals argue that the proposed development could reinforce an "out-commuter" culture rather than fostering a self-sustaining community with local employment opportunities.

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.

*

In relation to Chepstow, the overarching concern is that the Moun-ton Road development contradicts local and national sustainability, environmental, and legal policies. Residents are urging Monmouthshire County Council to reconsider its inclusion in the RLDP, emphasising the need for more robust environmental protections, infrastructure investments, and transparent governance processes. They call for policy revisions, improved traffic and air quality management, and a commitment to preserving the community's health, economy, and natural heritage.

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.

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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.

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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

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

24. Would you like to comment on this question *

☒ Yes

☐ No

25. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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.

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

**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

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

*

In terms of Chepstow, residents that I represent want Mounton Road (HA3) removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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

37. Is your representation in support or objection? *

☐ Support

☒ Objection

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

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

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

**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

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.

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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

44. 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?**

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.

*

In terms of Chepstow, residents that I represent want Mounton Road removed because of these concerns:

1. Environmental and Health Concerns

Air Pollution: The proposed development is expected to increase air pollution due to additional traffic, particularly around the already congested Highbeech roundabout. Nitrogen dioxide (NO₂) emissions are a significant concern, given that the area has long exceeded legal air quality limits.

Limited Air Quality Monitoring: The RLDP's air quality monitoring approach is criticised for focusing solely on NO₂, neglecting other harmful pollutants such as PM_{2.5} and PM₁₀. There is a call for broader environmental monitoring using portable emissions monitoring systems (PEMS).

Health Impacts: Increased air pollution threatens public health, particularly respiratory conditions in vulnerable populations like children and the elderly. Residents argue that this violates public health obligations outlined in the Wellbeing of Future Generations (Wales) Act 2015 and the Public Health (Wales) Act 2017.

2. Infrastructure Limitations

Healthcare: Existing healthcare services in Chepstow are overstretched. The RLDP lacks specific plans to expand healthcare infrastructure, raising concerns about future service capacity.

Transport and Traffic: Increased vehicle use is expected due to the development's location near key commuting routes. With no planned improvements to public transport or traffic management, congestion at critical junctions like the Highbeech roundabout is predicted to worsen, negatively affecting accessibility and emergency service response times.

3. Community and Social Well-being

Impact on Community Character: The development's design, including potential high-rise buildings for a care home and hotel, may alter the town's historic and rural character. Its proximity to the Wye Valley Area of Outstanding Natural Beauty (AONB) raises concerns about urban sprawl and landscape degradation.

Green Space Loss: The proposed development site includes high-grade agricultural land and green wedges critical for carbon sequestration, biodiversity, and recreation. The loss of these spaces is perceived as harmful to community well-being.

4. Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

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>

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

☐ Yes

☒ No

49. 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)?

50. 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 Policy Compliance

Contradictions with Welsh Legislation: Several legal frameworks appear to be at odds with the RLDP's proposals, including:

- Planning (Wales) Act 2015: Focuses on sustainable development through balanced economic, social, and environmental considerations.
- Environmental Air Quality and Soundscapes Act 2024: Requires air quality preservation, which the development is seen as undermining.
- Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Calls for comprehensive environmental assessments, which critics say have been inadequately conducted or withheld from public review.
- Wellbeing of Future Generations (Wales) Act 2015: Requires long-term sustainability planning, which residents argue has been ignored.

Climate and Environmental Policy Conflicts

Carbon Emissions and Climate Commitments: The development threatens to increase local carbon emissions through:

- Traffic congestion and private vehicle dependency.
- Construction-related emissions and the destruction of natural carbon sinks.

Biodiversity and Ecosystem Preservation: The site's potential impact on biodiversity and local ecosystems, including wildlife habitats, contradicts the Environment (Wales) Act 2016, which mandates the protection of ecosystems and natural environments.

Governance and Public Accountability

There is significant dissatisfaction with the perceived lack of transparency in the RLDP process. Residents criticise the absence of a publicly available Environmental Impact Assessment (EIA), which they argue violates both legal standards and public trust. They also criticise the navigability of the consultation survey; many felt it was not user friendly. The consultation process is also seen as insufficient, with concerns that the council has failed to meet public engagement obligations under Section 61W of the TCP Act 1990.

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.

51. 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

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

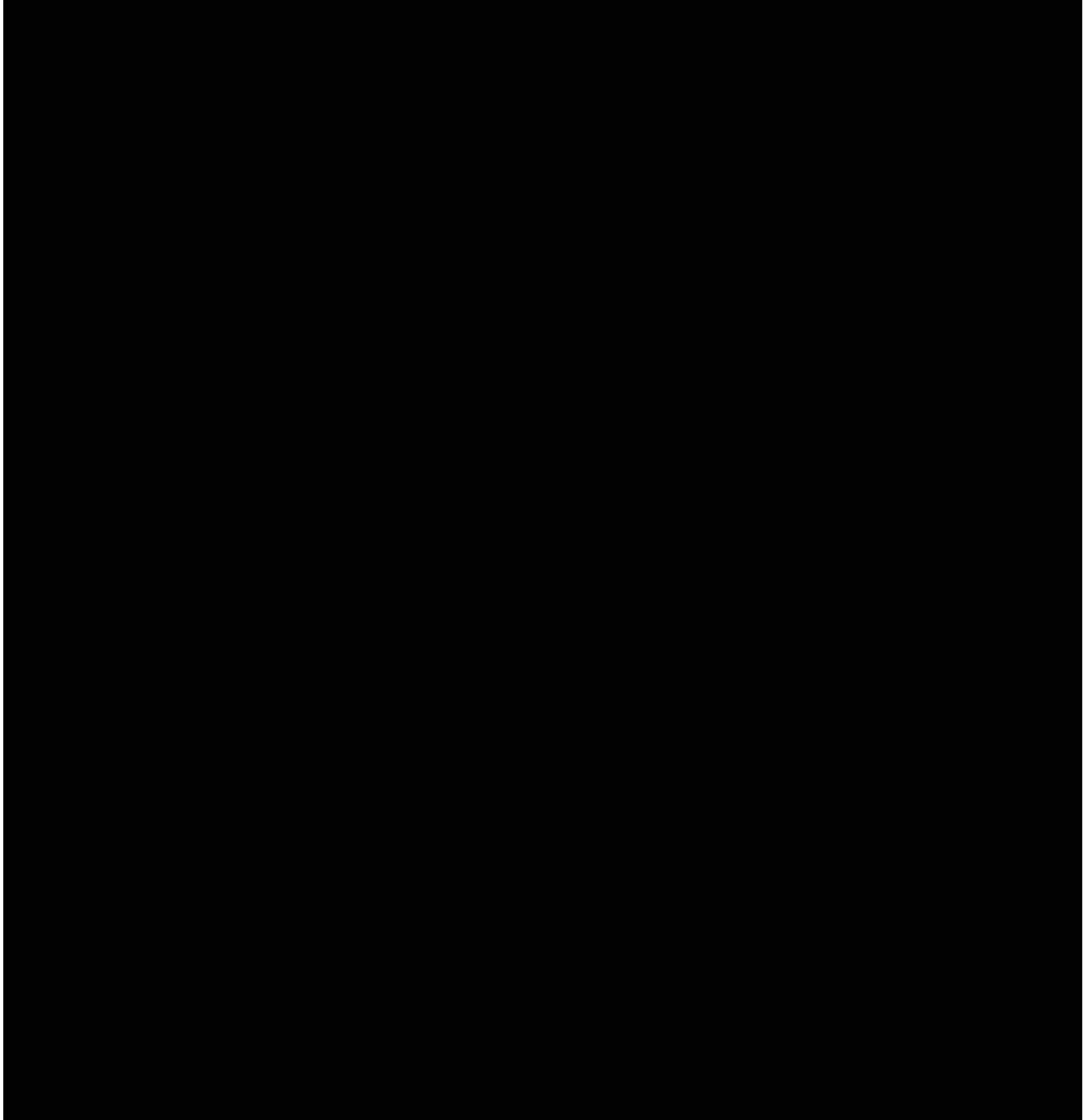
☐ Welsh

☒ English

Part 5: Welsh Language

53. 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?

54. 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?



2498

Councillor Penny Jones

Archived: 14 March 2025 15:46:28

From: [REDACTED]

Sent: Mon, 16 Dec 2024 11:06:52

To: [MCC - PlanningPolicy](#)

Subject: Raglan RLDP

Importance: Normal

Sensitivity: None

RAGLAN RLDP

I am writing to object to the RLDP proposal in support of the objection submitted by Raglan Community Council as both a Raglan Community Councillor and County Councillor representing Raglan Ward.

As has been pointed out it is recognised that we need more affordable housing schemes to support local residents and their families (e.g. as seen in Prince Charles Way), but the size of the developments and chosen sites is causing great concern amongst the residents for the reasons set out below:-

- **Firstly Raglan is a Village and not a Town as referred to by some members of the Planning Committee.**
- **The proposal for 54 houses, an industrial site and a solar farm within the village is entirely disproportionate to its needs. This is a centre of historic significance which relies heavily on tourism and the nature of the village will be changed significantly with the choice of sites within the RLDP.**
- **Alongside other developments, the latest being 21 houses on Monmouth Road and the 34 houses on Chepstow Road, the proposals will stretch it's infrastructure to its limits.**
- **Raglan Community council and residents are currently in discussions with the Welsh Government and other agencies regarding the safety of the A40 Junctions onto and crossing the A40 where cars exit old Monmouth Road onto the By-pass or cross over towards Monmouth.**
These are acknowledged as dangerous crossings where serious accidents have occurred and yet the proposal is for at least 100 extra cars to use this road (adding the cars used by the Chepstow Rd and Monmouth Rd developments). As this is also the main thoroughfare for Raglan Primary School there will be extra vehicular traffic with school buses, taxis and cars transporting pupils. Public transport is infrequent and therefore cannot be relied upon.
The alternative is for the cars to exit the village via the High Street which will only cause further congestion and problems that are well-known in the area. A more suitable smaller site for safe exit from the village is south, on the Usk road where the exit is directly onto a by-pass.
- **A renowned problem within the village is the water treatment plant which is unable to cope with extra housing and the threat of flooding is ever present as frequently witnessed of late. The sewerage system cannot cope with adverse conditions and causes frequent problems to some residences.**
- **The general infrastructure including the Surgery and Primary School can only cope with a limited increase in demand. The number of houses identified in the RLDP is not the number proposed in Raglan when other sites are taken into account. These cannot be ignored as they all use these facilities – the numbers cannot be seen in isolation.**
- **The Industrial site 'to bring employment' to Raglan is being proposed on agricultural land and it will totally change the overall scenic picture on entry to the historical village. It is unlikely to provide employment to many of the residents of the new builds who will have to travel to other areas.**
- **The proposal for solar panels to be built on important agricultural land which has one of two local dairy herds on a farm that has been run successfully by a family for many years, is deeply concerning.**
- **This will be a cause of unemployment - the farm will not be able to support all the members of the family as there will be insufficient land left to have a dairy herd. This at a time when the Farmers are being encouraged to provide food for the country and reduce imports so that everyone can buy British. There must be more suitable land within Monmouthshire County Council assets?**

I hope that these points will be taken into consideration.



2505

Councillor Steven Garratt

[View results](#)

Respondent

96

Anonymous

53:27

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

I fully support the need for affordable housing to solve the current housing crisis and zero carbon. This plan sets out to make Monmouthshire an exemplar county council in seeing to achieve this.

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

We need managed growth to ensure that local infrastructure requirements can be achieved such as access to active travel, local services in health and dentistry working with ABUHB and GPs/dentists to ensure that people can access primary healthcare and dentistry. We also need to market the county as a destination for small start ups and medium businesses to reduce the outflow of workers to the major urban centres.

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

Monmouth needs new housing and small business units. It is at risk of becoming a retirement town or dormitory town for those who commute. out of county. We need affordable homes for our public sector employees such as those in health and education. Severnside has had its fair share of growth. The plan looks sustainable for Monmouth.

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

GW1 will ensure the new developments will have a separate identity and help with wildlife corridors. OC1 seeks minimise spread of development in to the countryside and ensure connectivity to the settlement they are close to which will ensure protection of the wider rural landscape.

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

20. Would you like to comment on this question *

☐ Yes

☒ No

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

We need urgent action to start building new sustainable homes. Retrofitting is not the sole answer. No new home should be build unless they are net zero and off the fossil fuel grid.

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

There will be well founded concerns over the impact on local wildlife. The studies that will take place need to reassure that mitigating steps are taking to protect habitat where possible.

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

One of the main issues with previous development in Monmouthshire has been the debate over infrastructure and access to health care, dentistry and transport. Planners need to work with all partners such as ABUHB to ensure this issue is at the heart of each development so existing residents are reassured their access to services will not be reduced by new residents

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

We need to ensure all residents can access good quality and affordable home. Members of the traveller community add diversity to our communities and many integrate through their children attending school. Ensuring family groups can find a site to settle is vital and I support the plan.

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

Careful thought need to be given to the Drewen Farm site as Kings Wood Gate residents will need to be protected from the worst aspects of construction traffic on a settled estate. Consideration needs to be given to alternate access points for construction traffic.

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

Monmouthshire needs to encourage SMEs to move here or expand. The policy will offer existing businesses room to grow and new businesses a launchpad.

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

As well as supporting accommodation businesses we need to support sustainable tourism such as cycling holidays and walking. Where large groups visit our key towns need suitable parking for coaches. These will in turn support our small high street businesses which are still recovering after Covid.

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

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

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

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

It would be great if we could support SMEs such as recycling firms to move here (WEE/glass/plastic) so more waste can be sustainably processed and not shipped abroad.

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

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

The plan is a lengthy and detailed programme. It sets out the vision for a more vibrant county and I support it.

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

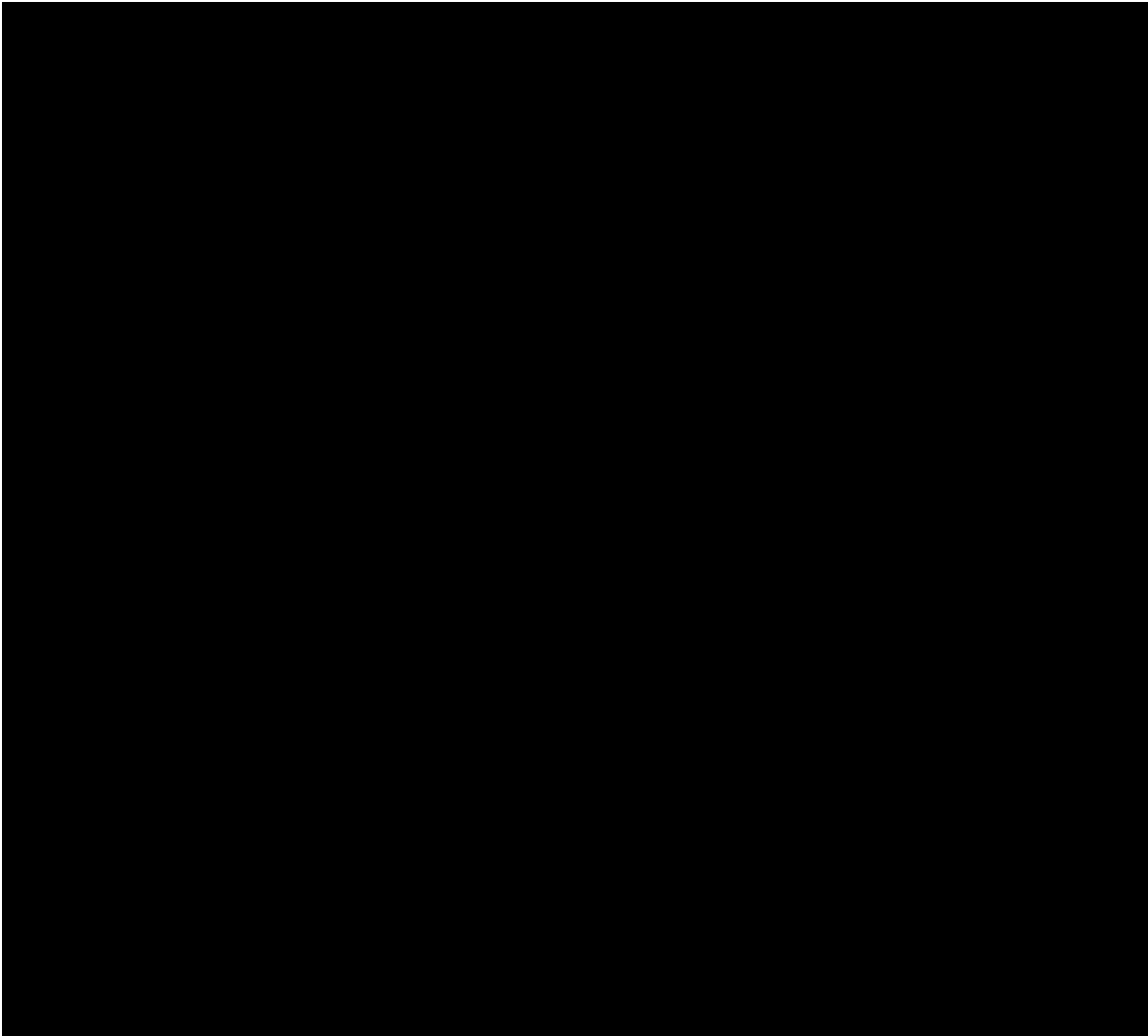
Part 5: Welsh Language

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?

I have no comments

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?

I have no comments



ut where you
ected character-

2821

Councillor Rachel Buckler

Archived: 13 March 2025 13:51:59
From: [REDACTED]
Sent: Tue, 17 Dec 2024 14:34:10
To: [MCC - PlanningPolicy](#)
Subject: FW: RDLP Consultation CS0274
Importance: Normal
Sensitivity: None

I object to the proposed building of 270 new homes on the site adjoining Dixon Road, Monmouth identified in the proposal as HA4/CS0270.

I would strongly suggest that the potential site on Wonastow Road detailed as CS0274 is a better option for the town of Monmouth and for the potential residents of the new properties.

My reasons for objecting are ;

Drinking Water Safety.

The drinking water supply for Monmouth and indeed other metropolitan areas of South Wales is abstracted at Monmouth at a point 300m downstream of this proposed housing development.

The development of land for housing at the proposed site HA4/CS0270 upstream of the abstraction point is fundamentally foolhardy. The lowest point of the proposed site is 267m from the bank of the River Wye and the surface water run off from the site will enter the Wye at a point 300m upstream of the abstraction point. Drinking water abstraction points must be treated with the greatest of respect and physical natural drainage changes that have the potential to endanger the drinking water quality of the Wye is damaging to the security of our most basic life sustaining asset. The Monmouth sewage treatment plant outfall into the River Wye is 1.8km downstream of the drinking water abstraction point for a very good reason.

The proposed 270 houses with their 600+ residents and associated 400+ cars are going to contribute to the surface water run-off pollution that will hit the river 300m above the abstraction point. The River Wye already has unacceptably high phosphate levels in the river water and the drinking water treatment plant is already under two long term improvement notices to reduce the risk of *Cryptosporidium* spp. parasites and the concentration of dissolved phosphate entering our drinking water.

The proposed site at HA4/CS0270 is heavy clay type soil and as such rainfall runs off rather than soaking into the ground. The bottom of the fields, bordering Dixon Road, collect large ponds of water. If the land were to be developed, the newly installed drains would give rise to a very rapid run off into the River Wye which would exacerbate the potential for contaminants in the intake pumps of the abstraction point for our drinking water. I understand that reed bed technology has been proposed to deal with this problem but published studies indicate this technology is only capable of reducing the phosphate content in storm run-off by 25%.

If the CS0274 site at Wonastow Road were used for the proposed development, the surface run-off and associated pollution risks would drain into the River Wye 1.3km downstream of the Welsh Water abstraction point. This would therefore present no risk to our drinking water.

Preservation of the Wye Valley National Landscape (WVNL).

Monmouth is a gateway to Wales, with phenomenal landscape vistas as visitors drive down the A40 from England into Wales. Monmouth acts as both a destination in its own right and as a stopover for other locations deeper into Wales. While the proposed site is not technically part of the Wye Valley National Landscape it does sit next to the WVNL and is a seamless continuation of the WVNL visual panorama. The HA4 site would be extremely visually prominent to all who

travel into and out of both Monmouth and Wales. The CS0274 Wonastow Road site however would be far less visually obtrusive to visitors to the town.

Traffic considerations.

The 270 houses would bring an additional traffic loading of 400+ vehicles. If these vehicles were accessing and exiting the proposed site at HA4/CS0270 it would be onto Dixon Road at a point 100m from the Dixon roundabout on the A40. The Dixon roundabout is already a major concern for residents of Monmouth as at peak traffic times particularly associated with school drop-off and pickup times of day the traffic is extremely heavy and slow moving which causes traffic to back up into the main street of the town (Monnow Street) and other feeder roads to Dixon Road, namely Hereford Road and traffic trying to come into Monmouth over the A40, Wye bridge from Wyesham. This is because there are five schools in a very small proximity all using the same Dixon Road exit route out of Monmouth. The five schools in question are The Boys Haberdashers, the Girls Haberdashers, Osbaston Infants, Osbaston Juniors and Monmouth Comprehensive School.

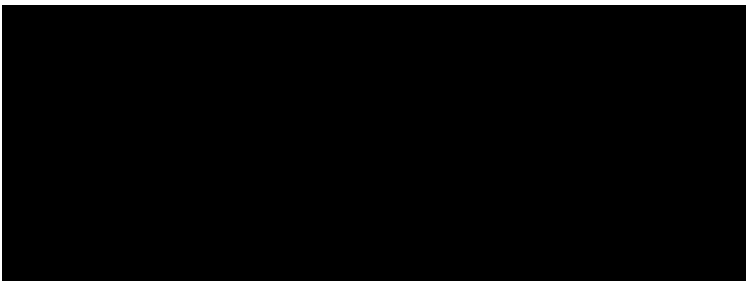
If however the CS0274 site at Wonastow Road was utilised for the required housing, the traffic access to the housing would not involve Monmouth town centre or the eastern side of the town where the school traffic chaos occurs. Access to the Wonastow Road site would make use of Link Road giving vehicle commuters easy access to and from the A40 in both a northeast and southwest direction and would not contribute to the current traffic in Monmouth even at peak times of day.

For the potential purchasers of new housing the HA4 site at Dixon Road suffers from a great deal of traffic noise both day and night from the A40 dual carriageway whereas the CS0274 site at Wonastow Road offers some level of reduction in the noise from the A40 traffic.

The potential CS0274 Wonastow Road site offers easy walking access to Monmouth's largest employers on the nearby, modern, industrial estate where Mandarin Stone, Siltbuster Ltd, TriWall and Singleton Court plus a variety of builder's merchants and industrial units offer employment opportunities. It is a 1.6km, flat walk or cycle ride into the town centre for other types of employment opportunities. National Cycle Route 423 passes the potential site and runs along Wonastow Road to Monmouth town centre. For residents who would be commuting outside of Monmouth by car for work the Link Road provides a quick route to and from the A40 which does not add to existing traffic in Monmouth town centre.

Conservation.

The proposed site at HA4/CS0274 Dixon Road has a well documented colony of Greater Horseshoe bats residing at nearby Newton Court. It is the only colony of this particular species of bat in Monmouthshire and only one of three such colonies in Wales. This species of bat appears on the endangered "Red List". The fields that would be built on, the associated street lighting, the noise, the loss of hedgerow that provides the insect food source will obviously have an adverse effect on the bat colony. I am unable to find the same limitations relating to the alternative potential site at CS0274 Wonastow Road.



Archived: 13 March 2025 13:56:25

From: [MCC - Planning](#)

Sent: Tue, 17 Dec 2024 13:26:06

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

Cc: [REDACTED]

Subject: FW: RLDP Consultation - Devauden Ref: CS0214

Importance: Normal

Sensitivity: None

FAO. Planning Policy Team: planningpolicy@monmouthshire.gov.uk

From: [REDACTED]

Sent: 17 December 2024 13:24

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

Subject: RLDP Consultation - Devauden Ref: CS0214

RLDP consultation - Devauden Ref: CS0214 Land at Churchfields Residential - 20 houses

I wish to log my concerns regarding this site and the need to have safeguards in place before this site is suitable.

There exists a very real problem with the sewage system in Devauden, and although there are promises from Welsh Water that these will be upgraded, we would need to be confident that these measures are in place and fit for purpose.

We have seen from the development recently completed (originally called The Fallows and now renamed Cwm Fagor) that there are serious concerns with safety of pedestrians, road layout and the impact it has on residents, and farming businesses that have caused real problems for existing and new residents. We need to get these things right before building begins. This remains of serious concern for Devauden residents.

There is not an adequate solution to public transport and active travel options in Devauden and inevitably residents will need to travel to access shops and commute to work, so this needs to be addressed before the development is considered.

The infrastructure and pressure on schools, health care provision is of concern. We need to have a proper plan to make sure the infrastructure is in place before this development is given the green light.

Pressure on traffic management, extra burden on the surrounding area or increased traffic needs to be considered.

The current waste treatment plant at Devauden is at or beyond maximum capacity. The solution at the time of the approval of the Cwm Fagor 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.



3118

Councillor Meirion Howells

Archived: 13 March 2025 14:49:11

From: [REDACTED]

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

To: [MCC - PlanningPolicy](#)

Cc: [REDACTED]

Subject: RLDP Consultation Llanbadoc & Usk Ward

Importance: Normal

Sensitivity: None

Attachments:

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

Dear Planning Policy

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

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

Nadolig Llawn / Merry Christmas & Best Wishes

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



Website / Gwefan: www.monmouthshire.gov.uk

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

.....

.....

.....

.....

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

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

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

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



Part 2: Your Representation

Office
Use Only
Represent
tor
Number

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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

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

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

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

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

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





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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

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

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

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

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

Is your representation in support or objection?

Support:

Objection:

Yes

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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





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

Is your representation in support or
objection?

Support:

Yes

Objection:

S4.

Monmouthshire County Council declared a climate emergency in May 2019

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

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

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

I support that developments must incorporate sustainable drainage systems

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

NZ1

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

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

Flood Risk

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

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

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

Net Benefit for Biodiversity

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

G12 Trees, Woodland & Hedgerows.

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

Dark skies and lighting

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

Policy NR1 – Nature Recovery and Geodiversity

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

Phosphate Water Quality

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

Surface Water

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

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

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



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

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

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

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

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

Infrastructure

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

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

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

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

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





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

Is your representation in support or objection?

Support:

Yes

Objection:

Housing Mix

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

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

Affordable Homes

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

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

Gypsy & Traveller communities

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



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

Is your representation in support or objection?

Support:

Mixed

Objection:

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

HA11 Land east of Burrium Gate Usk

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

There were **151** respondents.

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

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

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

Resident Concerns

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

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

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



The two developments at Little Mill

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

There were **44** respondents.

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

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

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

HA15 Land East of Little Mill

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

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

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

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

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

HA16 Land North of Little Mill

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

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

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

Gypsy and Travellers

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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





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

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

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

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

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

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

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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

Is your representation in support or objection?

Support:

Yes

Objection:

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

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



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

Is your representation in support or objection?

Support:

Yes

Objection:

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





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

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

Part 4: Appearance at Examination Hearing Sessions

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



the most appropriate procedure for accommodating those that want to provide oral evidence.

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

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

Part 5: Welsh Language

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

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

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



Guidance Notes

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

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

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

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

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

Tests of Soundness

Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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





New or Amended Sites

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

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

General Data Protection Regulation (GDPR)

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

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

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

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

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

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

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

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

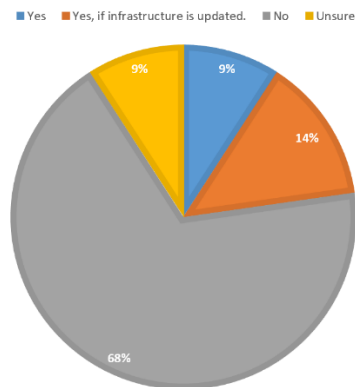
32 (73%) respondents felt there was not a need for affordable housing.

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

When asked:-

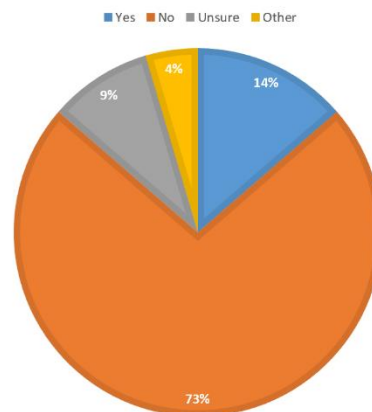
Would you like to see a 20 home, zero carbon, 50% affordable housing development in Little Mill?

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



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

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



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

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

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

Comments in support of development if infrastructure is upgraded.

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

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

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

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

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

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

Comments from respondents who were unsure of future developments

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

Usk Replacement Development Plan (RLDP) Survey Results October 2024

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

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

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

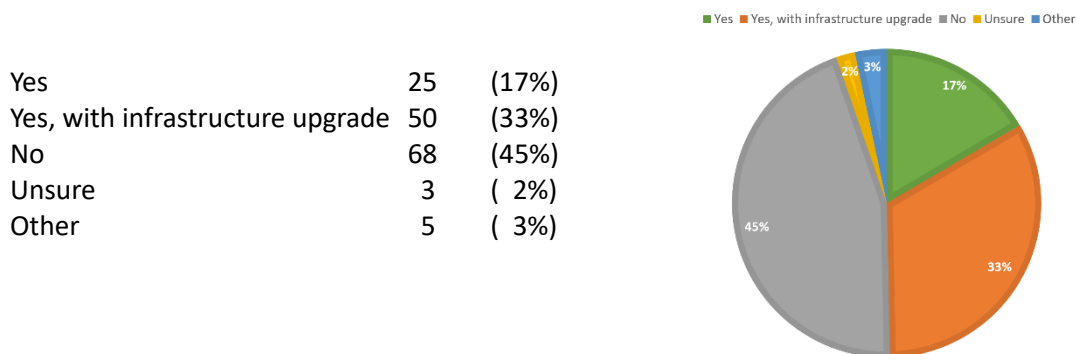
72 (48%) respondents agreed there was a need for affordable housing in Usk.

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

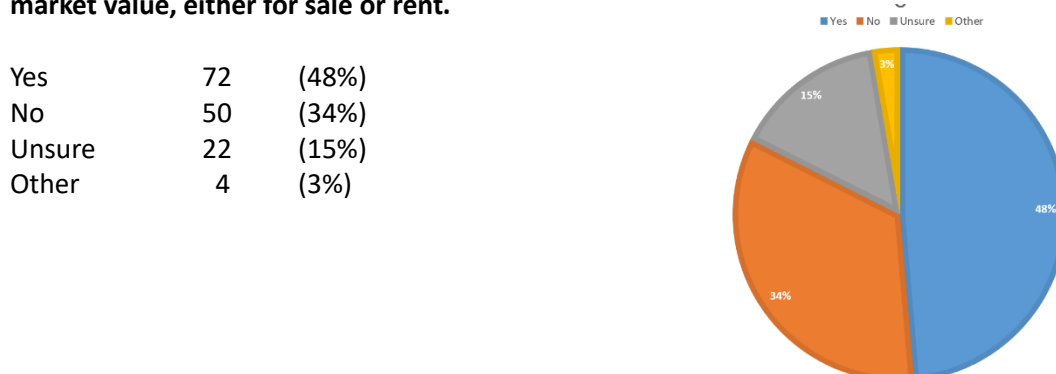
97 respondents left a comment. There were 42 comments in favour of a development and 51 comments opposed to a development in Usk.

When asked:-

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



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



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

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

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

Comments in support of development if infrastructure is upgraded.

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

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

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

Comments from respondents opposed to a housing development in Usk.

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

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

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

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

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

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

Comments from respondents who were unsure of future developments

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