The Planning Inspectorate
Yr Arolygiaeth Gynllunio

APPENDIX 1

Adroddiad i Gyngor Sir Fynwy	Report to Monmouthshire County Council
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Arolygydd a benodir gan Weinidogion Cymru	**an Inspector appointed by the Welsh Ministers**
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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 64

REPORT ON THE EXAMINATION INTO THE MONMOUTHSHIRE LOCAL DEVELOPMENT PLAN

Plan submitted for examination on 10 December 2012

Examination hearings held between 7 May & 14 June and from 1 to 4 October 2013

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ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
BBNP	Brecon Beacons National Park
CIS	Community Involvement Scheme
DA	Delivery Agreement
FC	Focussed Change
FCA	Flood Consequences Assessment
IMAC	Inspector Matters Arising Change
LDP	Local Development Plan
MAC	Matters Arising Change
MADD	Mardy Against Deri Development
NRW	Natural Resources Wales
Para.	Paragraph
PPW	Planning Policy Wales
RIFW	Regeneration Investment Fund for Wales
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SLA	Special Landscape Area
SINC	Site of Interest for Nature Conservation
SSSI	Site of Special Scientific Interest
SPG	Supplementary Planning Guidance
TAN	Technical Advice Note
TLA	Traffic Light Assessment
UDP	Unitary Development Plan
UHP	Urban Housing Potential
WAO	Wales Audit Office
WG	Welsh Government
WSP	Wales Spatial Plan

Summary

This report concludes that, subject to the recommended Matters Arising Changes (MACs and IMACs) set out in Appendix A, the Monmouthshire Local Development Plan (LDP) provides an appropriate basis for the planning of the County up to 2021. The County Council has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements. The main changes are summarised below:

- Restructuring of explanatory text to ensure that the strategy arising from the key issues, vision, objectives is coherently expressed;
- Increase the amount of housing provided for the period from 2006-2011;
- Address the identified shortage in housing provision through the allocation of additional sites and extensions to existing strategic sites where possible;
- Establish measures to provide accommodation for Gypsies and Travellers in line with national policy;
- Clarify in site specific policies that highly vulnerable development will not take place in areas of high flood risk;
- Clarify that protected employment sites should normally be retained for employment development only;
- Include an updated infrastructure schedule for the strategic sites as an appendix to the LDP;
- Delete the housing allocation at Llandogo;
- Delete the Green Belt designation west of Chepstow and restore the green wedge designation.

In conclusion, with these recommended changes, the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in LDP Wales. Most of the changes recommended and endorsed in this report are based on proposals put forward by Monmouthshire County Council in response to matters discussed during the examination. The changes do not alter the thrust of the Council's overall strategy.

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1 Introduction

1.1 Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a Local Development Plan (LDP) is to determine:

(a) whether it satisfies the requirements of sections 62 and 63 of the Act and of regulations under section 77 and
(b) whether it is sound.

1.2 This report contains the assessment of the Monmouthshire Local Development Plan (from hereon referred to as "the LDP" or "the Plan") in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the Act.

1.3 The LDP meets the requirements of the Act and Regulations. The submitted LDP has been considered against the tests of soundness set out in paragraph 4.35 of *Local Development Plans (LDP) Wales, 2005*. The starting point for the examination is that the local planning authority has submitted what it considers to be a sound plan, together with the evidence base that supports its position.

1.4 At the Pre-Hearing Meeting the Council confirmed that the Plan it wished to be examined was the deposit LDP as modified by the proposed Focussed Changes (October 2012)[1] schedule (FCs). Since these changes have been the subject of consultation and the Sustainability Appraisal (SA)[2], they are accepted as part of the submitted LDP. The Deposit Plan as modified by the FCs therefore formed the starting point for the examination of the Plan's soundness. This composite document is referred to hereinafter as the LDP or Plan.

1.5 Since the purpose of the examination is to determine whether the Plan is sound, changes in this binding report are recommended only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. Throughout the examination the Council maintained a schedule of Matters Arising Changes (MACs) which includes changes the Council suggested in response to matters raised during the examination. The MACs do not alter the thrust and strategy of the LDP. This list has formed the basis of the MACs set out in Appendix A to this report. The MACs highlighted with grey shading are required to ensure that the Plan is sound and I recommend these binding changes; they are all referred to in this report. The MACS prefixed with an 'I' are Inspector changes (IMAC); all others were proposed by the Council.

[1] EBLDP.38 Monmouthshire Local Development Plan: Schedule of Focussed Changes (October 2012)
[2] As advised by Examining Local Development Plans Procedure Guidance (The Planning Inspectorate Wales)

1.6 The MACs that are not highlighted are not required to make the Plan sound but are included because they improve clarity and precision. These MACs are only referred to in the report where they aid understanding of the matters being discussed. MACs relating to minor editing and typographical errors are not referred to in this report. The Council may make any consequential amendments arising from the MACs.

1.7 All duly made representations and the matters raised at the examination Hearings have been considered. However, given the focus of the examination on soundness, the report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan's soundness. Changes sought by any representor are the subject of a recommended change only where it has been found, on the basis of all of the evidence, that such a change is required.

1.8 A number of representors have proposed alternative sites to those allocated in the Plan, most notably for housing development. The starting point for the examination is that the Council considers that it has produced a strategy, policies and allocations that are sound. There are likely to be a number of ways that the Council can meet the needs of its community and all could be equally valid. Some may consider that the allocations in the Plan do not present the best solution but I am limited by statute and can only recommend a change to make the Plan sound. I cannot seek to make a sound plan better. Subject to the proposed changes referred to in this report the Plan submitted for examination is considered to be sound. My changes include the allocation of one additional site. With that exception there is no need to allocate further sites and no reference is made to the majority of proposed alternative sites in this report.

2 Procedural Tests

2.1 The Delivery Agreement[3], which incorporates the Community Involvement Scheme (CIS), was agreed with the Welsh Government (WG) and published in November 2007. A revised timetable, occasioned by additional, informal consultation, was approved by WG in September 2011. As a result of the high number and detailed nature of the representations to the Deposit Plan there was some further deviation from the indicative timetable. The Council's response to these was meticulous resulting in a comprehensive and definitive Report of Consultation[4].

2.2 The Council adhered to the consultation methods and procedures it had set out in the CIS; it made reasonable and genuine efforts to

[3] EBLDP.1
[4] EBLDP.35

engage with local communities in the preparation of the LDP. A relatively small number of community and amenity groups were listed in the CIS but these were added to as the process unfolded. The special Council meeting held in July 2011, at which the draft Deposit LDP was discussed publicly before being approved for consultation, illustrates the important status which members conferred upon the LDP.

2.3 With regard to the consultation process, for representors to have found out about the LDP through seeing a notice or speaking to a neighbour is not a flaw in the procedure but an indication that the chosen methods were effective. Similarly, the increased number of responses between the Preferred Strategy and Deposit stages suggests not that initial consultation was inadequate but that the exercise as a whole was gathering pace with more people becoming involved.

2.4 It is clear from the quality and clarity of the written submissions and the articulate manner in which representors, including those with little previous knowledge of the planning system, expressed themselves at the hearings, that the process was clearly understood and followed properly. The high numbers of representors, including those keen to participate in the hearings, indicate that the consultation exercises were properly implemented and successful.

2.5 The consultation on the additional sites was held for six weeks during July and August 2013, an adequate period as most people are not away from their homes for such a time, even during the summer. It was sensible of the Council to put notices at and around the sites, as required by the CIS[5], where those most affected would have a good chance of seeing them. The notices in the local press, letters or emails sent to previous representors, and letters sent to individual households neighbouring the sites, were appropriately targeted consultation measures and consistent with the CIS.

2.6 During the consultation on the additional sites the Council's website was rebuilt resulting in some of the essential LDP pages being unavailable for a few days. This was beyond the control of the planning policy officers or the Programme Officer and frustrating for them. They worked hard to remedy the position and are to be commended for the speed with which the affected pages were reinstated. In addition the incorrect website link, publicised in the covering letter to stakeholders[6], is unlikely to have prevented a significant number of residents from submitting their views.

[5] EBLDP.1 page 29
[6] EXAM075

2.7 I do not consider, therefore, that either the temporary non-availability of the website pages or the failure of the link significantly compromised the consultation exercise on the additional sites.

2.8 The LDP has therefore been prepared in accordance with the Delivery Agreement and the Community Involvement Scheme. Accordingly, I am satisfied that it complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 including requirements in relation to consultation, advertisement and the publication and availability of prescribed documents.

2.9 The Plan has been subject to SA including Strategic Environmental Assessment (SEA)[7]. FCs[8] and additional sites put forward by the Council and myself as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA.

2.10 In accordance with the Habitats Directive[9] a Habitats Regulations Assessment (HRA) of the Plan has been undertaken[10]. This indicated that LDP proposals could have a significant effect upon the integrity of the European sites[11] within the Plan area or in adjacent areas and that an Appropriate Assessment was required. This has been carried out[12] with the conclusion of the most recent assessment being that the Deposit LDP as amended by the Focussed Changes and Additional Sites will not have adverse effects on the integrity of European sites as the recommended mitigation measures have been incorporated into the Plan.

Conclusion

2.11 Accordingly, procedural tests P1 and P2 have been satisfied and the relevant legal requirements complied with. The Monmouthshire LDP has, therefore, been properly prepared.

3 The Overall Plan Strategy

The Structure of the LDP

3.1 The LDP Vision is in two parts. Firstly there are three statements of intent which generally cover settlements and communities, the character of the built and natural environment, and Monmouthshire people and their lifestyles. Secondly the spatial implications of achieving the Vision are set out in three further, more detailed and

[7] EBLDP.22, EBLDP.23, EBLDP.36
[8] EBLDP.36
[9] European Union Habitats Directive (92/43/EEC)
[10] EBLDP.12
[11] As defined in PPW version 5 paragraph 2.4.6
[12] EBLDP.24, EBLDP.37

area specific statements which outline the broad direction and type of growth in the three main towns, Severnside and the rural area.

3.2 There can be no dispute about the aspirations set out in the first three statements and they were subsequently adopted as the vision for the Community Strategy[13]. Their themes continue through to the vision for the Monmouthshire Single Integrated Plan 2013-2017[14] albeit that they are encapsulated in the single phrase 'Sustainable and Resilient Communities'. The first part of the Vision is now, therefore, somewhat superfluous but its retention is helpful in reinforcing the principles of sustainability.

3.3 The overall strategy is currently broken up by the sections on Spatial Issues and Council's Priorities; in order to aid coherence the first are to be relocated to Chapter 3 MAC5, MAC6, and the second are to be relocated to Chapter 2 MAC3, MAC9. The LDP's objectives are helpfully arranged under the same theme headings as those of the Wales Spatial Plan (WSP)[15]. They are thorough and comprehensive enabling the Vision to be achieved and addressing all the identified Key Issues. In Objective 2, changing the reference from 'meet[ing] the needs of their own populations and those of the surrounding hinterlands' to 'serving' them will avoid the misapprehension that settlements should be self-contained MAC8.

3.4 Some amendments will also be made to the Key Diagram and Proposals Map. Most are for clarity and precision, only those relating to the additional allocations and the removal of the Green Belt are necessary for soundness MAC10, IMAC13.

3.5 The allocations and policies clearly contribute to the objectives and vision, and are consistent with one another. The LDP is also broadly consistent with national policy including that set out in the most recent version of Planning Policy Wales. This is addressed in more detail later in this report.

3.6 It is common practice for LDPs to cover a period of fifteen years. This is not a statutory requirement, however, and this LDP's currency from 2011 to 2021 is not unsound. The main effect of the reduced Plan period, which by the time of adoption is likely to be only seven years, will be increased pressure on delivery, particularly of the housing requirement and for those sites where constraints will lengthen the planning, preparation and run-in times.

[13] MON.11
[14] MON.29
[15] WPP 10

The Spatial Strategy

3.7 Monmouthshire has a varied and beautiful landscape and is also a mainly rural area. These two characteristics present the Council with a difficult task when searching for suitable sites for new development but it is not its case that the limits of the County's environmental capacity are being reached. MAC2 deletes this reference. Indeed, in such circumstances it is essential that the social and economic elements of sustainability[16] are given due consideration alongside environmental factors. New development, including for housing and employment, will enable communities to thrive and achieve an adequate level of self-containment; without this they would be at risk of aging, stagnating and thus not being sustainable.

3.8 In its *Justification for Spatial Distribution of Housing Development*[17] the Council considered four options for the distribution of development throughout the County, a concentration in either:

- the three Main Towns,
- Severnside,
- those settlements where opportunities existed for large scale mixed development, or
- proportionately according broadly to the size of existing settlements.

3.9 Consultation raised a primary concern that the various concentration options would not enable housing and other needs to be met across Monmouthshire as a whole. Proportionate distribution was thus the favoured option but the initial sustainability appraisal[18] indicated that it might lead to significant negative impacts on travel patterns; on access to facilities, particularly for those with no car and on lower incomes; and on the accumulation of developer contributions with consequent disadvantage to regeneration initiatives.

3.10 Overall the SA concluded that the proportionate distribution option would not result in a pattern of development that could be sustained in the long-term. Furthermore, the opportunity to provide housing at levels necessary to deliver sustainable neighbourhoods supported by new service provision would be missed. There would also be likely to be lower levels of housing development in larger towns and villages which could reduce the delivery of homes in areas of the greatest demand.

3.11 In the light of these consultation and SA findings it was sensible of the Council to adopt a hybrid solution. A subsequent SA of that choice indicated that the provision of new housing, provided that it was affordable, in smaller towns and villages would support rural

[16] As defined in *One Wales: One Planet: The Sustainable Development Scheme of the Welsh Assembly Government* (WAL.29) and set out in Figure 4.1 of *Planning Policy Wales Edition 5* (WPP.11).
[17] EBS.21
[18] EBLDP.10

communities and employment. Moreover, new housing in towns would boost the available workforce and where accompanied by new employment allocations might help to improve levels of self-containment.

3.12 On the negative side the SA noted that unless new community service infrastructure is provided alongside new housing in Magor/Undy there would be a risk that future residents would be highly dependent on their cars. It also found that this part of Monmouthshire could also develop as a dormitory settlement with little character or community identity. Finally, in rural areas development should be directed to villages that had a good range of everyday services but the provision of new homes in such locations would inevitably create additional car travel.

3.13 Despite these concerns the hybrid option is more likely than the other four to make an effective contribution to the LDP objectives including to building sustainable communities, to supporting rural communities, to promoting a sustainable economy and to achieving sustainable accessibility.

The Main Towns

3.14 One of the three strands of the LDP's Spatial Strategy is an emphasis on the three main towns of Abergavenny, Chepstow and Monmouth; whilst the first two are identified in the WSP[19] as Primary Key Settlements Monmouth is not. Apart from not being connected to the railway system it seems, however, that the town has a similar role and level of function to those of Abergavenny and Chepstow. Whilst the LDP must have regard to the WSP it also states that other important towns in the Capital Region[20] can be identified through the LDP process, as has been done here.

3.15 The majority of housing provision is made on single, strategic sites in each of the Main Towns and on four sites in the Severnside area. Where possible these allocations include an element of employment land to provide some existing and future residents with the opportunity of local work; this would help to reduce the high levels of out-commuting from the County and the long distances travelled to work by a large number of residents. The rationale behind the identification of large sites was set out early on in the preparation process[21], a major consideration being whether they would be vital to the implementation of the LDP strategy. The possibility of allocating smaller sites was also considered, however, if their location and grouping would allow them to have a cumulative strategic impact.

[19] WPP.10 para. 19.5
[20] WPP.10 para. 19.5
[21] EBCS. 2 Candidate Sites Assessment Process and Criteria April 2009 page 5 section 3

Rural Secondary Settlements

3.16 Although previously considered as part of Abergavenny, Llanfoist was assessed separately from it in the *Function and Hierarchy of Settlements Study*[22] published in 2008. This revealed that, at 872 people, its population[23] was slightly lower than those of Penperlleni (1198) and Raglan (1145) which were also classified as Rural Secondary Settlements. The services and facilities[24] there were shown to be significantly better than in most other villages and on a par with those available in Penperlleni and Raglan. Despite Llanfoist's proximity to Abergavenny it is therefore appropriate for it to be identified separately as a Rural Secondary Settlement in its own right. This change from the Preferred Strategy is explained sufficiently in the September 2011 revision of the *Justification for Spatial Distribution of Housing Development*[25].

Main and Minor Villages

3.17 The Council's methodology[26] for assessing a settlement's sustainability centred on access to facilities and services, including public transport. Villages which scored 5 or more, and were then ranked in the third tier or above, had the potential to be designated as Main Villages and suitable for a housing allocation.

3.18 The results of the ranking exercise were modified by the consideration of additional factors such as the size of the village, its landscape setting and, crucially, a suitable supply of land. Although not weighted in the original assessment the types of facilities available were also taken into account. Cross Ash and Llanvair Kilgeddin, for example, are both fourth tier villages but designated as Main Villages by reason of having schools.

3.19 Penallt is ranked at equal 25th with Llanddewi Rhydderch and both are identified as Main Villages having a housing allocation. With populations well below 200 and limited services, which do not include a shop of any kind or a school, neither seems to be in a particularly sustainable location. Many settlements in the County, however, including some which have a more lowly rank but are also classed as Main Villages, have fewer facilities and smaller populations. The pressing need for affordable housing has also led to less sustainable villages, such as Llanddewi Rhydderch, being allocated sites because they are in community council areas where all the settlements are small and with few facilities.

3.20 Many representors comment on the lack of, or limited, employment opportunities within the villages. The LDP's approach is consistent with national policy which says that where development is intended to

[22] EBS.10
[23] EBS.10 Appendix 2
[24] EBS.10 Appendix 3
[25] EBS.21
[26] EBS.10

meet local needs a site may be acceptable even though it may not be accessible other than by the private car[27].

3.21 Development has generally been directed to the larger villages but in a few instances, and for convincing reasons, sites are allocated in more remote, less well-served settlements. All things considered the village classification is based on robust and credible evidence and is appropriate.

Previously Developed Land

3.22 PPW[28] states that previously developed (brownfield) land should be used in preference to greenfield sites wherever possible. The allocations at Fairfield Mabey, Chepstow and at the former paper mill, Sudbrook, indicate that the Council has implemented this policy where practicable. In addition the dwellings anticipated to be constructed on sites identified in the Urban Housing Potential Study[29] have been incorporated in the housing provision figures set out in Policy S2.

3.23 PPW also recognises that not all previously developed land is suitable for development. Its location may be such, for example, that the benefits of re-use would be outweighed by the disadvantages arising from an isolated community, particularly in increased reliance upon private cars. This consideration is salient in much of Monmouthshire with its extensive rural area.

3.24 RAF Caerwent has been suggested as suitable for development. Whilst it was agreed by the Council to have some potential for employment much of it is still in military use; until there is a firm timetable for the cessation of this and the site's release it cannot be allocated as there would be no certainty as to the delivery of development there. At the hearing I was informed that 3,500 dwellings would need to be built for the site to be viable. Whilst viability evidence was not examined in any detail such a scale of development within this Plan period would not be consistent with the Spatial Strategy.

Consistency with other plans and neighbouring authorities

3.25 In 2010 the UK Government announced that RSS would be revoked. As such, the Council has had limited regard to the RSS of neighbouring English regions whilst preparing the LDP. Instead, and appropriately, it has taken into account the existing and emerging development plans of neighbouring English authorities, namely the Forest of Dean, Herefordshire, South Gloucestershire and Bristol. The latter has a key role as an employment and service centre for Monmouthshire residents whilst Monmouth is an important town for parts of the other districts. The Councils liaise on emerging development plans and

[27] TAN6 para 2.2.3
[28] PPW para. 4.9.1
[29] EBS.34

other proposals through consultation and the submission of representations when necessary.

3.26 The Council has provided examples of the way in which it has worked collaboratively at a regional level and with neighbouring authorities. These include the preparation of a minerals study for the former Gwent area[30] and a Local Housing Market Assessment with Torfaen and Newport[31]. In preparing the LDP it has had regard to the recommendations of the Regional Waste Plan, the South East Wales Aggregates Working Party Regional Technical Statement and the Regional Transport Plan as well as the emerging local planning policies of neighbouring local authorities. As a result there are no unresolved cross-border issues or inconsistencies.

Conclusion

3.27 The overall strategy is coherent and based on a clear and methodical preparation process. Subject to the changes proposed, the spatial strategy has a sound basis and is consistent with national policy and the WSP.

Recommendation

3.28 That in order to make the Plan sound the following changes are required:

MAC2, MAC3, MAC5, MAC6, MAC9, MAC8, MAC10, IMAC13

4 Housing Provision

Methodology and calculation of housing provision

4.1 PPW states[32] that 'the latest Welsh Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements.' The most recent projections are those for 2008 which point to a requirement for 400 dwellings pa over the period from 2011-21. The Deposit LDP provided for this requirement.

4.2 Although the LDP Plan period is 2011-2021, the Preferred Strategy[33] calculated a requirement of 5250 dwellings over the period 2006-2021. This was despite the adopted UDP covering the period to 2011 and its housing requirement having been fully delivered, albeit that the UDP Inspector[34] considered that the provision to be towards the bottom end of the range.

[30] EBS.9
[31] EBS.22a-d, EBS23
[32] PPW para. 9.2.2
[33] EBLDP.8 p.51
[34] MON.19, page 2 of covering letter from Inspector to his report on UDP.

4.3 Because the Council's Preferred Strategy explicitly sets out to deliver a certain rate of housing provision over the period 2006-2021, and the period 2006-11 under-delivered in relation to this, it is right that the LDP, even though stated as only for the period 2011-2021, should address as far as is practicable the element of shortfall.

4.4 The consensus is that to do this in full, including a 10% contingency allowance, would mean provision in the LDP of about 5200-5300 over the period 2011-2021. Given the short amount of the Plan period remaining, which will be only seven years by the time the LDP is adopted, and that housing completions since 2011 have been below the estimated requirement rate, it is unrealistic to expect the LDP to deliver more than 5000 dwellings by 2021. Even when reduced by the 10% contingency allowance and completions from 2011-2013, such a rate would depend upon annual completions above 550[35]. This would be in excess of the highest annual number of completions during the past thirty years, that is, 548 in 1988[36].

4.5 Balancing all these factors I conclude that an overall provision for the delivery of 4500 dwellings in the Plan period (as set out in Table 1) is sufficient to ensure that the LDP is sound in terms of both meeting anticipated need and being realistically deliverable, given the remaining Plan period available. IMAC1

Table 1 Amended Housing Requirement

Deposit LDP total	4000
Additional number for 2006-2011	+ 500
Housing requirement	= 4500
10% contingency allowance	+ 450
Total housing supply	**= 4950**

4.6 Part of the County is in the Brecon Beacons National Park (BBNP). A small allowance of 10 per year is made in the LDP for dwellings built in the BBNP area, an arrangement agreed with the BBNP Authority and which I am satisfied is appropriate[37].

Addressing the shortfall

4.7 During the examination the Council officers suggested some additional sites[38] which would have resulted in an additional 840 dwellings. All but one of these were ratified by members and a consultation exercise was

[35] 5000 – 500 (10% flexibility) = 4500 - 596 completions 2011-2013 (as set out in revised Policy S2 [EXAM111]) = 3904 ÷ 7 = 558
[36] EBS.37 JHLAS 2009 Annex 1
[37] EBLDP.34 Representor 293
[38] EXAM048b

carried out. MAC15 amends Policy S3 to include the additional sites. In order to remedy the remaining shortfall I am recommending the allocation of an additional site at Drewen Farm in Monmouth which was the site which members did not approve. It will be an extension to the Wonastow Road site and provide additional dwellings in Monmouth, consistent with the Spatial Strategy. The amendment will be accounted for in a revised Policy S2 and its accompanying text. IMAC2, IMAC3

4.8 The position is also helped by slight alterations to the components of overall housing provision and updating the figures. In doing this[39] the Council has found an additional 69 dwellings which result from additional units having been completed between 2011 and 2013 which were not identified in the UHP study. Whilst this does not result in the de-allocation of sites it does respond to the argument put forward by some site opponents that the Council has not taken all recent development into account. I have used the total number of dwellings resulting from the updated table as the starting point for my calculation below.

Table 2 Amended Housing Provision

	Dwellings
Revised Policy S2 (EXAM111)	**4892**
Remove allocation at SAH8(vii), Llandogo	-15
Remove 60 dwellings from large site windfall	-60
Overall reduction	**-75**
Allocate part of alternative site ASB088 Drewen Farm, Monmouth	80
Allocate Coed Glas, Abergavenny	60
Overall increase	**140**
Total number of dwellings	**4957**

Contingency/flexibility allowance

4.9 The Deposit LDP figure did not include a contingency allowance but the Council agreed during the main hearings, and rightly in my opinion, to remedy this. A proportion of 10% is usually considered appropriate to provide the required level of flexibility should sites in the Plan not be delivered as anticipated. In Monmouthshire this would be sufficient to replace at least one of the strategic sites which is a satisfactory justification for that figure.

[39] Revised Policy S2 EXAM111

4.10 The Council has rationalised its shortfall on the additional 900 dwellings required in my Preliminary Findings[40] as a decrease in the flexibility allowance to 8.4%[41]. Whilst this is a reasonable argument, the 17% reduction in the number of dwellings available as a contingency is too great a margin of variation.

Density/strategic site figures

4.11 The number of houses to be developed on each strategic site, as set out in Policies SAH1 – SAH5, was originally a maximum. This wrongly set a ceiling on development and might have unnecessarily limited the contribution which sites could make to the overall housing requirement. It has been remedied through focussed changes[42] which prefix the number, or replace 'no more than', with 'around'.

4.12 An approximate figure for the number of dwellings which will come forward on sites is necessary for the assessment of housing provision. In implementing Policies SAH1 – SAH5, however, the respective figures should be seen as indicative rather than rigid requirements.

4.13 When assessing planning applications for housing allocations the determining factors will be general planning considerations including other relevant LDP policies. Policy DES1, which covers general design considerations, provides a helpful checklist; it would be supplemented by a thorough assessment of issues including landscape character (Policy LC5), nature conservation (Policy NE1), traffic and transport (Policy MV1), flood risk (Policy SD3), and so on. Furthermore, in order to make the most efficient use of land criterion i) of Policy DES1 requires that the minimum net density of residential development should be 30 dwellings per hectare.

4.14 This mechanism will aid flexibility if, for example, constraints are found which restrict the amount of developable land below that initially envisaged and where the allocation will not, consequently, yield the indicative figure. On the other hand, the ability to build above the policy indication would allow developers to respond to market and social conditions if a high proportion of smaller properties were required in the overall housing mix or if constraints were not as limiting as anticipated.

4.15 At the hearings the Council quoted a recent, award-winning scheme in the County where innovative design had resulted in a much higher-than-anticipated density. Such proposals should not be ruled out on allocated sites by the notion of having to comply with a specific figure. I have no reason to believe that the allocated sites will consistently produce lower numbers than indicated but, should this occur, it will be registered and remedied through the monitoring process.

[40] EXAM036
[41] M3-S26-MCC p.4
[42] EBLDP.38 FC27a, 28, 30a, 31a & 32

Distribution of housing

4.16 The table below shows the revised position with regard to housing provision taking account of the Council's additional sites and the allocations and other changes I am recommending. It indicates the distribution of residential growth between 2011 and 2021 and shows that the additional allocations will alter the pattern of growth set out in the Deposit LDP only slightly.

Table 3 Amended Distribution of Housing

Settlements	Dwellings on allocated sites	All new dwellings 2011-2021[a]	% of growth 2011-2021
Abergavenny	310[b]	566	11.4%
Chepstow	350	675	13.6%
Monmouth	485[c]	825	16.6%
Main Towns	**1145**	**2066**	**41.7%** (44.8%)
Caldicot	0	210	4.2%
Portskewett	285	324	6.5%
Magor/Undy	495	631	12.7%
Caerwent	0	152	3.1%
Rogiet	0	53	1.1%
Sudbrook	190	244	4.9%
Severnside Settlements	**970**	**1614**	**32.6%** (28.1%)
Usk	20	53	1.1%
Raglan	45	75	1.5%
Penperlleni	65	122	2.5%
Llanfoist	0	245	4.9%
Rural Secondary Settlements	**130**	**495**	**10%** (8.3%)
Villages & Other Rural	**200[d]**	**782**	**15.8%** (18.8%)
TOTAL	**2445**	**4957**	**100%**

[a] based on 'total' column in revised table, Policy S2
[b] allocation of Coed Glas (60)
[c] allocation of Drewen Farm (80)
[d] remove allocation at Llandogo (15)
(% growth 2011-2021 shown in para. 5.15 of Deposit Plan)

4.17 Overall the proportions of residential development reflect the Spatial Strategy[43] and Policy S1 with the largest amount in the Main Towns and just under a third in Severnside.

4.18 The greatest change from the Deposit LDP is in Severnside. The additional site at Vinegar Hill will help to redress the imbalance between residential and employment allocations in Severnside, which was

[43] LDP page 51

discussed at the hearings, and the 4.5% increase in the proportion of the County's growth that will take place in the area is reasonable. Within Severnside itself Magor/Undy will see an increase in its proportion of growth of 12.7%. This is nearly twice that of other settlements in the Severnside area but still only 3.6% more than originally planned in the Deposit LDP. It is consistent with Policy S1 which identifies that 'a smaller amount of new housing development [than in the Main Towns] is provided in the Severnside sub-region, particularly at Magor/Undy and Caldicot/Portskewett.'

4.19 I appreciate that comparatively few additional dwellings have been provided in the Caldicot and Portskewett area and that it appears to residents of Magor and Undy that their villages are bearing the brunt of the need for more allocations. In identifying sites several factors other than the Spatial Strategy must be taken into account, not least the availability of suitable alternatives. The difficulty of finding sites of any size at Caldicot because of its development history was described by the Council at the hearings and, as well as encroaching into the important gap between Rogiet and Caldicot, the Garthalan Drive site has significant access constraints.

4.20 At 41.7% the emphasis and main focus for new housing development will continue to be within or adjoining the Main Towns. The largest amount of growth, 16.6%, will be in Monmouth but, proportionally, this is lower than the 19% indicated in the Deposit LDP. The additional allocations will slightly reduce the differential in development between Monmouth, Abergavenny (now 11.4%, previously 13%) and Chepstow (now 13.6%, previously 12.9%).

4.21 Representors have referred to Monmouth having had more than its fair share of development and of not having the capacity for any more. Consequently, the Drewen Farm extension to the Wonastow Road allocation was the single additional site not to be ratified by members. There is little evidence, however, that this is the case. Residential development on the scale now proposed will be consistent not only with the first point of the Spatial Strategy, that is the focus on Main Towns, but also the fourth which requires that residential growth should take place in association with opportunities for mixed use development schemes particularly in Chepstow and Monmouth.

4.22 With regard to the other two Main Towns both Abergavenny and Chepstow are more constrained by their locations than Monmouth; the former is adjacent to the BBNP and overlooked from viewpoints within it, Chepstow is bounded by the River Wye to the east with the green-wedge open land to the west providing an important gap between it and Severnside. Even so, contributions to the increased housing provision have come forward during the examination in both towns; a new allocation at Coed Glas in Abergavenny will provide 60 or so dwellings and at Fairfield Mabey, Chepstow there will be an additional 110.

Site Selection

4.23 The strategic sites were first identified in the Preferred Strategy[44] having been selected from those put forward as Candidate Sites through a traffic light assessment (TLA)[45]. The Council chose this method over a scoring exercise because it would allow a more considered balancing of different criteria. The criteria themselves focus mainly on environmental and travel/location characteristics and are described in the Candidate Sites Assessment Process and Criteria[46].

4.24 The TLA is a somewhat blunt tool. Although the criteria vary significantly in importance they are not weighted; location near to a shop is of similar status as to whether a site is brownfield and being close to an internationally important biodiversity area is measured in the same way as proximity to one of only local importance. In many instances the green, amber or red grades do not allow for subtle or explicit answers. Furthermore, the criteria do not cover all the elements that contribute to sustainable development or that were taken into account in the selection process. The results, therefore, as set out in Appendix G of the Preferred Strategy[47] are not decisive and the selected strategic sites do not have noticeably better grades.

4.25 The TLA might thus appear partial or inadequate. The Council stressed during the hearings, however, that it was mainly a method of collecting information about sites. This seems to have been the intention since the beginning of the process as it is mentioned in EBCS.2[48] that additional information would be collected against the chosen criteria. The selection methodology also makes clear[49] that the appraisal schedule would allow for comments to be made and that there would be a reasoned justification for both the inclusion of strategic sites and the rejection of others. The TLA was not, therefore, the only method of selection, nor ever intended to be.

4.26 In addition, by the time sites reached the TLA stage there had already been some screening. This was carried out according to the size of sites, or groups of sites, and also on whether they would make a significant contribution to the overall LDP strategy. It partially explains why there were not always significant differences in gradings between those sites which were selected and those which were not; many of those which would have attracted more red scores had fallen at the earlier hurdles.

4.27 The Council was worried that, were additional sites to be allocated in settlements where the strategic site would be more difficult to develop,

[44] EBLDP.8
[45] EBCS.6 to 9
[46] EBCS.2
[47] EBLDP.8
[48] Para. 3.6
[49] EBCS.2 para 3.8

those additional sites would come forward first to the detriment of development on the strategic sites. Little evidence was put forward to prove that this might be the case but, in my view, this was an incidental consideration which was not decisive in ruling any sites in or out.

4.28 There have been concerns with regard to the way some sites have been classified against the criteria. I am satisfied that, in the main, the Council corrected genuine errors and that several of the disputed entries were the result of interpretational differences. In these instances some were altered and others remained but all those brought to the notice of the Council were carefully considered. Overall the sites were selected through a transparent process with individual decisions based on robust and credible evidence. The selection process was in line with the advice set out in the LDP Manual[50].

4.29 The additional sites put forward by the Council officers to meet the shortfall identified in my preliminary findings came from the pool of sites which had already been considered in some depth including, in most cases, through public consultation and sustainability appraisal. The main rationale for selection was to extend the existing strategic sites which was a valid approach. There is little evidence as to how the additional sites were picked out from other alternatives; it seems to have been a continuation of the earlier process honed by the Council officers' knowledge and understanding of the County. It was helpful that the sites were put forward promptly and, as they were consistent with the Spatial Strategy, I am satisfied that appropriate choices were made.

Five year land supply

4.30 At my request the Council provided a trajectory[51] based on its original housing provision figure of 4000 and the numbers to be achieved from the sites allocated in the deposit LDP. TAN1[52] advises that the five-year land supply should be assessed by comparing land available for residential development with the remaining housing provision in the adopted development plan; this is known as the residual method. Sites can only be included if they either have planning permission or are allocated in an adopted development plan. Furthermore, to be regarded as genuinely available within five years sites must meet two criteria: firstly the necessary infrastructure must be available within the five year period and secondly, it must be financially viable for them to be developed.

4.31 Whilst some of the Council's forecasts might be optimistic, for example at Wonastow Road and Deri Farm, the criteria confirming genuine availability are met. By my calculations, which update those in EXAM007R to take account of the revised provision figure and the

[50] LDPG.3
[51] EXAM007R-MCC
[52] TAN1 Joint Housing Land Availability Studies

additional allocations, a five year supply of housing land will be available at least during the first years following adoption.

Conclusion

4.32 Subject to the binding changes recommended the amount and distribution of housing proposed in the LDP is realistic, appropriate and founded on a credible evidence base. Sites were selected in accordance with a robust methodology. Overall housing provision meets the tests of consistency and of coherence and effectiveness.

Recommendation

4.33 That in order to make the Plan sound the following changes are required:

MAC15, IMAC1, IMAC2, IMAC3

5 Specialist Housing Provision

Affordable Housing - Target

5.1 The provision of sufficient affordable housing is an important and challenging matter in Monmouthshire where house prices are comparatively high but not matched by earnings. There was discussion at the hearing with regard to the use of unconstrained and constrained models in the identification of housing need. The former is a simple comparison between the number of households projected to form or move to an area and those projected to dissolve or leave the area; the difference between the two is the number of additional dwellings required in an area. The constrained model includes a factor for the number of new dwellings to be delivered and results in higher overall estimates for housing need. The LDP target is a constrained figure which, as it is more realistic than the unconstrained, is appropriate.

5.2 The target figure of 960 is derived from the updated local housing market assessment[53] but this was erroneously modelled on a dwelling delivery rate of 350 pa rather than the 400 pa planned in the Deposit LDP. A clarification paper[54] explains that the increased number would be marginal and that it was not, therefore, considered necessary to re-run the model.

5.3 At the hearing I was told that a re-run would only be necessary if provision was to change by 500 units or more over the Plan period. At 4500 dwellings to be delivered during the Plan period, my recommendation is at this threshold. Requiring a re-run of the model and that Policy S4 be based on an updated target would, however, cause a considerable delay in adoption of the LDP. In my view, the Council, by including low site thresholds and high requirements where achievable, is

[53] EBS.23 June 2010
[54] SE.1 paras. 38-40

ensuring that the LDP will provide sufficient affordable housing to make a contribution to community regeneration and social inclusion in line with PPW[55]. The new and extended allocations will also generate additional affordable units; the revised calculations[56] indicate that all the allocations, the identified UHP sites, current commitments and windfalls would produce over 1100 if the maximum percentages were achieved. In these circumstances little would be gained from updating the target. Indeed, in the light of the short Plan period remaining the delay resulting from it would threaten delivery of the overall housing requirement.

5.4 The Council's methodology for assessing housing need is consistent with that used by WG to estimate future need in Wales. This is more suited to the longer term and development of strategy than the basic approach set out in the Local Housing Market Assessment Guide 2006.

Viability

5.5 The affordable housing viability study[57] which was originally published in 2010 has been updated[58]. Setting the threshold land value at £650,000 revealed that, under current building regulations, the percentages of affordable housing required in Policy S4 could largely be achieved in the Main Towns and Rural Secondary Settlements but were unlikely in the Severnside area. Under the scenario anticipated for 2013 they would be achieved only in Monmouth and the Rural Secondary Settlements.

5.6 The update concluded that for Chepstow, Abergavenny and part of the rural area the 35% target would be a reasonable starting point for negotiation; it might not be achieved in all circumstances and 30% may be more realistic in the short term. Severnside was a more challenging market such that achieving the target of 25% would be demanding. The update suggested, however, that the target in this area should not be reduced on the basis of potential changes to the building regulations rather than known costs. It recommended that the policy remain unaltered.

5.7 Some changes, such as an 8% reduction in greenhouse gas emissions and the implementation of sprinklers, have now been confirmed by the ministerial statement[59]. There is no timetable for the first and the second will not be required in all new dwellings until 2016. Nonetheless the Council has allowed for these costs in its current calculations[60]. I note from WG[61] that the average cost for Part L increases and sprinklers is estimated to be £3100 which is somewhat lower than the Council's additional average cost per dwelling of £7075.

[55] PPW 9.1.15
[56] EXAM114
[57] EBS.1
[58] SE.3
[59] EXAM082
[60] M3-S28-MCC
[61] M3&4-S26 to 28[419] final page

5.8 The effect of the additional costs has been analysed in Annex 3 to the Council's statement for the additional hearing[62] which finds that the post-statement situation is a slight improvement on that calculated in the update. The results do not alter greatly, however, and the conclusions are very similar. Overall the most recent analysis concludes that the robustness of the targets for affordable housing in Policy S4 is demonstrated but with a recognition that the 25% target in Severnside may not always be achieved. The policy requirement for an appropriate viability assessment will cover instances where provision below the target is proposed.

5.9 Questions have been raised with regard to elements of the viability assessment, including house price assumptions, the use of a notional 1ha site with no constraints, the omission of the cost of SUDS, abnormal costs and the level of the benchmark. These were supported by reference to the large housing allocation at South Sebastopol and discussed in depth at the hearings. In relation to additional costs which may affect viability, some are frequently encountered whilst others will be regarded as abnormal. Extraordinary costs would need to be taken into account at an appropriate stage and factored into the viability assessment but would remain subject to variation from site to site. They are therefore best taken into account in negotiation on specific proposals with the policy target percentages as a starting point. On the whole I consider the viability assessments provide a reasonable and realistic basis for the amount of affordable housing to be required in various parts of the County.

5.10 In any event, should the viability of a development be compromised by the amount of affordable housing required Policy S4 allows variation from this, consistent with TAN2[63], by way of an appropriate viability assessment. As the percentages will, in cases where viability is a concern, form the basis for negotiation it is appropriate that they be set at the top end of the range.

5.11 On the allocated sites in the Main Villages and infill sites in Minor Villages, as set out in Policy H3, the affordable housing requirement is non-negotiable; if 60% of the dwellings are not affordable then development will not take place. Where the capacity of a site is below the policy threshold, Policy S4 allows provision to be made through a financial contribution towards affordable housing in the local planning authority area.

Rural settlements

5.12 In parts of the rural area there has been some dispute as to the need for affordable housing and the suitability of certain villages for allocations, particularly as the justification for these is only the high proportion of

[62] M3-S28-MCC
[63] TAN2 para 10.4

affordable housing. Where additional surveys of need have been carried out it is usually on the basis of community council areas, several of which do not include a larger or more obvious village for the location of such development. Some cases are discussed briefly in section 7 which deals with rural allocations.

5.13 In such settlements other considerations come into play including whether there is land available; all village allocations are made on sites which have a willing landowner. This assists viability in that the landowner is aware from the outset that the reason for the allocation is the provision of affordable housing and they adjust their expectations accordingly. The value of such a site is still greater than if it were to remain as agricultural land.

5.14 The Rural Housing Enabler's (RHE) statement[64] explains that a survey designed by the Local Government Data Unit Wales has been used to quantify housing need in rural areas. Significant need has been identified but the exception site policy, which up to now has been the main method of implementation, has had very limited results. The LDP's approach is more appropriate and more likely to deliver affordable housing in the rural settlements of the County. Community consultation will be needed regarding the design and size of affordable housing required. The RHE concludes that the LDP strategy will make an important contribution to addressing the problems that a lack of rural affordable housing causes.

Policy S4

5.15 The Council has revised Policy S4[65] and supporting text in the light of questions I asked at the hearing MAC16, MAC17. The new layout makes it easier to read and understand, anomalies between percentages and numbers have been ironed out, a helpful reference is made to Policy H3 and terminology is clarified. Amendments to the accompanying text are required to update the figures arising from the additional allocations; I have included 28 affordable dwellings for the Drewen Farm extension to Wonastow Road (35% of 80) IMAC4.

Provision for Gypsies and Travellers

5.16 The *Monmouthshire Gypsy and Traveller Accommodation Needs Assessment*[66] identified a need for 4 pitches on the basis of a proposal near Usk for such a facility. The planning permission, however, was for just two caravans. Furthermore, it is a personal permission which will not provide accommodation for Gypsies or Travellers once the named occupiers have no further need for it. In not meeting the identified need the LDP is not consistent with national policy. The LDP includes the criteria-based Policy H8 which identifies circumstances in which Gypsy

[64] SE.25
[65] M3/S28/MCC Annex 1
[66] EBS.12

and Traveller accommodation will be permitted provided a need for such is identified. It is not, however, sufficient to rely on this alone.

5.17 To rectify this position the Council has agreed to carry out a survey identifying Gypsy and Traveller accommodation needs in Monmouthshire throughout the Plan period. This must be done within two years of the LDP's adoption and the necessary sites allocated within a year of that study's publication through a topic-specific review of the LDP. To ensure the implementation of these requirements a relevant indicator is included within the Monitoring Framework which, if not met, will trigger investigation MAC56.

Provision for older people

5.18 The LDP records[67] that Monmouthshire has a relatively high proportion of older age groups. Figures included in the *Justification for Level of Housing Provision* document[68] show that the number of people aged 65+ is projected to grow by 45.8% during the Plan period and the projected increase in the number of older people in Monmouthshire will be from 17,600 in mid-2008 to 31,200 by 2033.

5.19 These statistics are significant although not all elderly people will require accommodation which includes the provision of care. There are no specific allocations or policies in the LDP and the Council considers that proposals for housing for people in need of care can be adequately judged against the framework of policies provided by the LDP. This will be made clear through a focussed change[69] which adds a paragraph on the matter to the housing development management policies section of the plan.

5.20 The UDP included a policy (H11) for housing for people in need of care which permitted such development subject to detailed planning considerations and other sustainability criteria. No specific sites were allocated but the Council has pointed out[70] that adequate numbers of special care housing units have been permitted in recent years including a development which will be located in Abergavenny. Furthermore, if needed, bungalows for elderly people will be constructed as part of the affordable housing mix on rural allocations.

5.21 The lack of a specific policy and allocations for housing for people needing care will not, therefore, prevent any of the objectives of the LDP from being achieved. In particular local needs for appropriate, affordable and accessible housing will be able to be met. As allocations for this use are not necessary to make the LDP sound I have not considered further the alternative site and proposal suggested at Grove Farm.

[67] LDP p31, para. 3.29
[68] EBS.20
[69] EBLDP.38 FC41
[70] EBLDP.35 pages 734/5, para 8.1

Conclusion

5.22 My conclusion on this matter is that the amounts of affordable housing required are based on robust and credible evidence and are, therefore, likely to be deliverable and to meet the needs of those in the County who have special requirements. Subject to the identified change to the monitoring schedule the policy dealing with Gypsy and Traveller accommodation will enable the needs of those communities to be met. The requirements of older people will be adequately addressed by the generic housing policies which will allow dedicated housing of various types for the elderly to come forward, there is no need for special policies or allocations.

Recommendation

5.23 That in order to make the Plan sound the following changes are required:

MAC16, MAC17, MAC56, IMAC4

6 Site Allocations

6.1 This section examines the allocated housing sites individually dealing firstly with the Council's allocations, including amendments and additions proposed during the examination, and then with the additional sites I am recommending.

6.2 Several allocations include varying amounts of agricultural land classified as the best and most versatile. The overriding need for housing in the County and on the allocated sites justifies their development and the loss of that agricultural land in the terms of paragraph 4.10.1 of PPW.

6.3 Whilst the allocations indicate that the principle of residential use site is acceptable, in sensitive landscapes proposals would be subject to Policy LC5. A landscape assessment would be required and the detailed proposal only permitted if it did not have an unacceptable adverse effect on the special character of the landscape. Policy DES1, which sets out general design considerations for all development, would also apply; it includes the need for landscaping which takes account of the appearance of the existing landscape and its intrinsic character.

6.4 All proposals would also have to comply with LDP Policies S12, SD3 and SD4 which will minimise the risk of flooding, including from surface water run-off at the new and existing development. Conforming with the LDP's transport and movement policies, S16 and MV1 – MV4, will ensure that only safe schemes which are easily accessible by a variety of modes are permitted.

6.5 In addition to its work on the original sites Dŵr Cymru has carried out assessments of the likely water and sewage infrastructure costs for the

additional allocations. They are all in the 'low' cost bracket as the water mains and/or public sewers are either, adjacent to the site and capable of providing a service to the development or, within a reasonable distance from the development which is of a density making it economically viable to procure a service.

6.6 Biodiversity interests at the allocated sites, including SINCs, would not preclude their development. The layout of proposals could be designed to incorporate and preserve valuable habitats; where this is not possible adverse effects would need to be mitigated against or compensated for under the terms of Policy NE1.

6.7 Much of the Rockfield Farm SAH5 and Vinegar Hill SAH6 sites are within a limestone safeguarding zone; they are also within a buffer zone around existing housing where working could not take place in any event. The development of the sites with housing would extend the buffer zone but the area of limestone resource which would be sterilised as a result would not be significant. The overriding need for housing makes the allocations consistent with criterion iii of Policy M2 part a).

Deri Farm, Abergavenny

6.8 This site was originally allocated for 300 dwellings but following a focussed change[71] that number has been reduced to 250. The site promoter now considers that 220 would be most appropriate. As the number set out in the policy could be applied flexibly, as outlined earlier, it is not necessary to alter the policy figure.

Site selection

6.9 Abergavenny is one of the three Main Towns and, according to Policy S1, one of the main foci for new housing development. Adjoining the BBNP and overlooked from several high vantage points within the Park the town is, however, in a difficult location in which to find suitable sites of any size. At the time of the examination into the UDP (2004) the Council did not consider the site suitable for housing development mainly on landscape and agricultural land grounds. Now there is a pressing need to provide additional homes in the county as a whole and within or adjoining Abergavenny; the ministerial statement[72] published in July 2013 lends significant weight to the primacy of this need. In this light the Council's change of position is appropriate as, following assessment of many of the alternative sites, it does not consider that those others suggested in the town and its surrounds are as appropriate.

6.10 A contributory factor to the site's selection has been the opportunity to underground the power lines which cross the site, a provision which is built into Policy SAH1 and thus essential to the allocation's delivery. The pylons are not obtrusive in views from the BBNP and, at closer quarters,

[71] EBLDP.38 FC27a
[72] EXAM082

their grey structures are frequently seen against the surrounding hills such that they are not unduly prominent. They do, however, loom over the adjacent residential estate and are extremely close to a few houses and gardens. Whilst I am mindful of MADD's findings on this matter[73], I consider the removal of pylons and undergrounding of the line would have a benefit for visual amenity in the vicinity of the Deri Farm site.

Landscape

6.11 The allocation will result in a change from open fields, which are currently in agricultural use, to residential development. Whilst many people like to live by the former, and may have done so for many years, the LDP's policies will ensure that the proposed housing area is well-designed, well-landscaped and attractive; it will not be unsightly in the landscape. The provision of a strong landscape buffer along the northern edge of the site, as required by MAC30, recognises its proximity to the BBNP and is necessary to minimise the effect of the development upon it.

6.12 In comparison with the full extent of Abergavenny and Mardy, much of which can be seen from surrounding viewpoints such as The Skirrid, development on the allocated site would not result in a significant extension of built form into the open countryside. It would, therefore, preserve the landscape setting and have no serious adverse effect on significant views out of the National Park. Neither would it cause unacceptable harm to the qualities that justify the designation of the BBNP or its setting; in these respects it would thus comply with Policy LC3.

Listed buildings

6.13 Two buildings in the vicinity of the allocated site are listed. Development would be on higher ground than Llantilio Pertholey Church and be seen from it. It would not, however, be in such proximity or sufficiently visible to harm the listed church or its setting. St Teilo House and its grounds would be wrapped around by the development on three sides of its plot. The grounds appear to be densely planted and this would act as a screen, minimising the effect of the new development on the setting of the listed building.

Undergrounding of power lines

6.14 There has been much discussion of this matter, as is right for a consideration which is essential to the allocation. A letter from the site promoter[74] acting on behalf of Persimmon Homes stresses that there have been prolonged consultations with Western Power on the matter and negotiations with affected landowners. It states that there is no outstanding issue which cannot be resolved and, at the time it was written, Persimmon was in the process of signing up legal contracts; the routes and levels of work for the undergrounding had been agreed with

[73] EBLDP.32 2159.D1/SAH pp 39 & 40
[74] EXAM106

Western Power. Furthermore, the amount allowed by the developer for the works had been doubled to £4m but the deliverability of the scheme was not undermined by this higher cost.

6.15 This letter, the two route options and site viability estimates included with it, and subsequent response from the site promoter[75] give me confidence that the allocation is realistic, appropriate and deliverable.

6.16 MADD has serious concerns and has raised questions about the feasibility of the undergrounding requirement. Some of these, for example regarding the width of the roads in which the 132kv line might be laid and its proximity to a high pressure gas main, are detailed and technical. Whilst important considerations they will, more appropriately, be addressed at the planning application stage. In the absence of detailed exploratory work Western Power's caveat[76] was reasonable. The evidence is sufficient to indicate that the development of the site including the undergrounding of the power lines is likely to be viable.

Traffic matters

6.17 The transport assessment[77], published in May 2011, was prepared in the light of extensive discussions with the highway authority (Monmouthshire County Council) and South Wales Trunk Road Agency. I give significant weight to its conclusion that additional traffic from the development could be accommodated on the local highway network and that there were no transportation reasons why the site should not be developed, provided that the range of transport measures identified were implemented.

Crick Road, Portskewett

6.18 The site was originally allocated for 250 dwellings and 2 ha of serviced employment land; an additional 35 units will be provided by halving the amount of employment land within the amended site to 1 ha MAC32.

Employment

6.19 Eleven hectares at this site were allocated for employment uses in the UDP but this has not materialised. The main source of evidence on this issue, the *Employment Sites and Premises Review* and its addendum[78], recommended that the Crick Road employment allocation be removed because it was too large in a location where there was already an oversupply. As such it created an imbalance in the distribution of land in the County. Its allocation for housing, with a small amount available for employment uses, makes the best use of the land. During the hearings it was agreed that an adjoining parcel of land in a different ownership be included in the allocation since it was also available MAC31, MAC32. The replacement of 1 ha of the originally allocated employment land with

[75] EXAM115a
[76] EXAM115a Appendix 2
[77] USS.2.3
[78] EBS.7 and EBS.8

additional dwellings will not be a significant reduction or contrary to the Spatial Strategy.

Flooding

6.20 The site is in flood zone A which is considered to be at little or no risk of fluvial or tidal/coastal flooding[79]. Highly vulnerable development such as housing can be considered in such zones. The area close to the Crick Road site has experienced existing problems and flooding from surface water run-off but this is caused by flow from the north east side of the road and would not be worsened by the proposed development. Assessments[80] indicate that run-off entering the allocated site, also from the north east, could be dealt with satisfactorily without jeopardising the deliverability or viability of development.

Traffic

6.21 Representors are concerned about the effect the development of the site would have on traffic conditions in the surrounding area. A transport assessment[81] has been carried out which concludes that good links would be created from the site to existing footways and public transport services. Vehicular access to the site would be via two new junctions onto Crick Road and the B4245. The additional traffic generated from the development would not create adverse capacity issues, place undue strain upon the highway network or lead to dangerous conditions within it.

6.22 The matter of accommodating a new footway in the bridge over the mineral railway, necessary to achieve good pedestrian links to Caldicot town centre, was addressed separately[82]. The *Portskewett Footway Review* sets out four options for solving this problem. The preferred Option 2 would provide a 2.5m wide, shared cycleway and footway and a new vehicle restraint system complying with current standards. It would be one of the more expensive solutions but, as the site is green field with few constraints, it would be unlikely to compromise viability. In any event the study sets out two more economical but still satisfactory options if the cost of Option B is considered to be too great.

Infrastructure

6.23 There are no significant infrastructure constraints at the site. A water supply can be provided and foul waste could be treated at the Nash Waste Water Treatment Plant, although some modelling work will be undertaken to determine where connection to the public sewerage system will be. There would be sufficient places at local primary and secondary schools and are no objections from the health board with regard to the capacity of local health facilities.

[79] TAN 15 Development and Flood Risk page 5 figure 1
[80] USS 1.2 & USS 1.3
[81] USS 1.1
[82] SE.26

6.24 In considering the alternative site at Sudbrook the Council compared the availability of everyday services between there and the Crick Road site[83]. This shows, for example, that a convenience store is between 6 and 10 minutes walk from Crick Road, the Main Road bus stop is a walk of between 7 and 11 minutes, and the recreation ground and centre between 8 and 12 minutes walk. I appreciate that Portskewett is a separate settlement from Caldicot and that many respondents wish it to remain that way. Nevertheless, a wider range of facilities is readily available in Caldicot and accessible by public transport.

Fairfield Mabey, Chepstow Policy SAH3

6.25 This is a large brownfield site close to the centre of Chepstow. It was allocated for around 240 new dwellings and 3ha of employment land. An additional 110 dwellings are to be provided here by increasing density and by bringing forward 45 or so units which were to be phased outside of the Plan period MAC33, MAC34. I am satisfied that this would not bring highly vulnerable development onto the floodplain and that there would be no harmful effect on the important nature conservation interests on and adjoining the site.

Traffic

6.26 A traffic study[84] was carried out in 2011, its brief being to assess the operation of key junctions within the vicinity of the site. Its conclusion was that the traffic generated from 450-500 dwellings on the site could be accommodated on the existing highway network. If development contributed towards highway improvements up to 600 dwellings could be provided.

6.27 The site is adjacent to the station and on the opposite side of the line from the town centre, access to which is via a bridge under the railway. The existing headroom here of 3.5m will need to be increased. A letter from Network Rail[85] confirms that there is a formal agreement between it and the site owner granting access rights which will enable the lowering of the carriageway under the bridge and other associated works. Traffic assessments also indicate that the increased number of dwellings on the site would not be significantly detrimental to highway conditions in the town. Other traffic matters were addressed in a review carried out in 2012[86].

Ecology

6.28 The site is on the western bank of the River Wye, the corridor of which is designated as an SSSI and SAC. It is a brownfield site previously in industrial uses but much of it has now been colonised by vegetation and could provide habitat for a number of protected species. Further policy

[83] EBLDP.35 Appendix to ASN091 pages 678 and 679
[84] USS.3.10
[85] EBLDP.32 Included with representation 165
[86] SE.23

criteria have been included[87] in response to the Habitat Regulations Assessment. The ecological appraisal[88] is based on a desktop search of biological records and an extended Phase 1 field survey. Additional, more detailed surveys would be needed but the appraisal's conclusion is that there is good potential for development to come forward which would avoid unacceptable nature conservation impacts. Valuable habitats along the river's edge and within a former quarry within the site, which is a SINC, could be retained, enhanced and managed in the long term as nature conservation assets.

Flooding

6.29 Most of the site has been assessed as being in flood zone A as categorised by TAN 15. It is thus suitable for residential development. MAC35 clarifies that no highly vulnerable development must take place on those parts of the site which lie within the C2 flood zone, consistent with TAN15. The development proposed is unlikely to result in a greater coverage of impermeable surfaces than the existing hard standing and former industrial buildings and surface water run-off is unlikely to increase. Some storage to cope with tidal conditions might be necessary but this could be determined at a later stage and incorporated into the site layout.

Delivery

6.30 The delivery of development on a brownfield site such as this will be complicated; the several stages are set out in a delivery plan[89]. Although the timetable outlined in that has already slipped by a few months I have no evidence that it is not realistic and reasonable. Relocation of the heavy manufacturing operation to Newhouse Farm is evidently well underway.

Wonastow Road, Monmouth

Flooding

6.31 A significant part of the site is within the C1 flood zone (2013) where TAN15 requires that new development must be justified by limited, strict criteria including that it is previously developed land. The C1 part of the site does not meet those criteria and will not, therefore, be developed but retained as a large parcel of public open space. In directing new development away from zone C towards, in this case, zone B where river flooding is less of an issue, the LDP is consistent with TAN15[90]. MAC36 clarifies this in line with TAN15.

6.32 The site and surrounding area can also be affected by surface water flooding and several photos have been submitted illustrating various events. Development proposals for the allocated site will have to

[87] FC 30b
[88] USS.3.2
[89] SE.22
[90] TAN15 para 6.2

demonstrate that surface water will not have adverse consequences on the site or its vicinity in order to conform with criterion e of Policy SAH4. In addition the proposed drainage measures would improve circumstances off-site.

Landscape character

6.33 The site is located on the western edge of Monmouth and on the valley floor. It will be visible particularly from the Wonastow Road approach into the town and from the higher, surrounding land including Offa's Dyke Path. The new settlement edge, which will be created along the western boundary of the site, will need careful treatment but, subject to good design and appropriate landscaping, the development will not be unsightly or any more obtrusive than other recent residential development in the town.

6.34 It would be impossible to provide residential and employment development of the scale required without encroaching into the landscape and surrounding countryside. The site is classified in the *Landscape Sensitivity and Capacity Study*[91] as being within a zone of medium landscape sensitivity and having medium capacity for housing. All of the landscape around Monmouth is visually attractive but, in comparison, this zone is the least sensitive and has the highest capacity; it is therefore appropriate that development is allocated in this zone.

6.35 In avoiding development on the C1 flood zone and the SINC the developed part of the site would be separated from the existing settlement. However, I consider the open area would not be widely or clearly apparent. From further afield, including areas of higher ground, the extent of the open area would not be so obvious as to appear to detach the new development from the existing settlement.

6.36 Whilst the SINC in particular would need to be maintained and managed in a natural state, I consider that the size, location and alignment of the open area would give it the appearance of parkland within the settlement rather than as part of the surrounding countryside. The allocation of the extension at Drewen Farm would close off the third side of the open area with development and further limit its visibility from the wider area.

Density

6.37 The Indicative Phasing Plan[92] for the Wonastow Road allocation confirms a 6.5ha employment area and 10 ha of residential development; the overall density of the dwellings would be 37 per ha. The site is affected by constraints, such as run-off from surrounding higher land, a general risk of flooding and the landscape sensitivity of the area, which might require parts of the developable area to be used for cut-off ditches and maintenance strips, a larger attenuation pond and landscape buffers

[91] EBS.17
[92] USS.5.4

along the boundaries facing open countryside. The allocation of the Drewen Farm site will extend the Wonastow Road allocation and allow a reduction in its housing density, if need be. I do not, therefore, have any concerns as to the potential of the site to deliver the number of units anticipated.

Employment

6.38 One of the conclusions of the *Employment Sites and Premises Review*[93] was that Monmouth was 'in desperate need of further employment land and premises to enhance the settlement's sustainability'[94] and that land for a full range of options needed to be brought forward soon. The addendum study[95], which was published in 2010 particularly to address employment issues which had arisen during preparation of the LDP, supported the allocation of the land at Wonastow Road noting that it was essential that it be serviced and made available[96].

6.39 Several representors have pointed to the nil take up of employment land in Monmouth recently as evidence that such an allocation is not needed. In my view, however, this reinforces that there is a limited range and quality of employment land and premises in the town and, additionally, a lack of sites that are readily available. The Hadnock Road industrial area is not sufficiently attractive to, or suitable for, the high quality industrial and business uses which Monmouth needs.

6.40 Parts of the LDP site were allocated in the UDP as employment land (for B1, B2 and B8) but were never developed as such. That area is within the C1 flood zone and under the LDP proposal would be retained as open space; the employment land would be located in the southern part of the site on the Wonastow Road frontage. Access to the residential land would therefore be through the employment site. This layout, with new employment uses close to the road and to those existing in the immediate area, would ensure good, commercially-attractive access; the low density, high quality of the employment development and uses restricted to B1, would provide an acceptable, attractive approach to the residential area behind.

6.41 The provision of this much-needed, serviced employment land is the fundamental benefit of the Wonastow Road site and the main justification for its selection over alternative sites. It is thus essential that the employment part of the allocation be delivered. This is made clear through criterion c) of Policy SAH4 whereby planning permission will only be granted subject to provision within the site for 6.5 ha of serviced land for high quality, B1 industrial and business development.

[93] EBS.7
[94] EBS.7 Para. 11.3
[95] EBS.8
[96] EBS.8 Para. 2.22

6.42 The proposed layout would aid the servicing of the employment land. The main access road to the residential part of the site will run through it and provide a conduit for essential services; utilities will thus be readily accessible for the employment land. The Delivery Statement for the site[97] refers briefly to the practicality of this arrangement whilst the Affordable Housing/Strategic Viability Study[98] includes an exceptional cost of £1.41m to cover highway works and opening up costs.

Traffic

6.43 The Transport Assessment[99] submitted by the then promoter concluded that the Wonastow Road site was well placed in relation to existing transport networks and that the proposals would enable future residents to meet most of their daily needs within a reasonable walking or cycling distance; future workers would be able to travel to the site by a variety of modes including an improved bus service.

6.44 Importantly, the impact of additional traffic within Monmouth could be mitigated through improvements to existing junctions. The Wonastow Road/Rockfield Road mini roundabout was operating at capacity at the time of the survey and experienced queuing delays. A potential for improvement would be to create an additional stacking lane on the Rockfield Road arm. The position at the Drybridge Street/Portal Road mini-roundabout is very similar. The traffic lights at the New Monnow Bridge would not be significantly affected; they apparently have a MOVA[100] function which is not currently in operation but which could be implemented to maximise capacity at the junction.

6.45 A footway on Wonastow Road must be provided but the essential land is in third party ownership. The Council reports that the owners of this, Tri Wall, have expressed an interest in working with the developers to achieve a solution which, in also improving access to their premises, would be mutually beneficial. A secondary access to the site from the adjacent industrial area could be provided on land owned either by the developer or the Council.

Planning application

6.46 The fact that a planning application for the allocation has been submitted does not conclusively demonstrate deliverability. Despite obvious errors, for example the description of development including B8 uses which would not be appropriate, it is however a helpful indication that a developer is sufficiently interested to invest in the studies and information-gathering necessary to make the application.

[97] SE.24 section 2.4
[98] EBS.1a
[99] EBLDP.32 Rep 2321
[100] Microprocessor Optimised Vehicle Actuation

Value for money investigation

6.47 There were concerns that the results of a value for money study being undertaken by the Wales Audit Office (WAO) might affect delivery on this site. It was originally an asset of the Regeneration Investment Fund for Wales but has been sold within the last few years to a private company. A helpful letter[101] from the WAO set out the position as at April 2013 and, at the time of writing, I am not aware of any further findings, conclusions or confirmed actions. The letter explained that the functions of the Auditor General did not include setting aside contracts entered into by the RIFW. WG does, however, retain a beneficial interest in the site and a change in the site's value, for example through its allocation for development in the LDP, will trigger a payment to WG. Nonetheless I have no evidence that such a payment would be of an amount sufficient to render the site's development unviable.

Rockfield Farm, Undy

6.48 In the Deposit LDP this was a mixed-use allocation for around 200 dwellings and 4ha of employment land. As a result of a change arising during the examination an additional 70 dwellings will be provided on 2ha of the employment land, similar to the position at Crick Road. The loss of half the employment allocation will not be significant as a considerable amount of land in the Severnside area is allocated for industrial and business use MAC37, MAC38.

Infrastructure

6.49 The situation with regard to water supply and sewerage, education and health facilities is similar to that at Crick Road; there are no significant concerns. Some facilities, such as a shop, primary schools, nursery, hall and open space, are within a realistic walking distance of the site as a whole. A wider range is available in Magor local centre but this is reasonably accessible only from the western part of the site. The Council acknowledges the lack of community and recreation facilities in the immediate area but points out that funds provided through S106 obligations entered into through the planning application process will enable additional or enhanced provision to be made to meet the needs of new residents.

Traffic

6.50 Following a thorough analysis of existing and projected traffic conditions the *Rockfield Farm Transport Assessment*[102] concluded that, subject to improvements at the B4245/Steelworks Road East junction, the Rockfield Farm site could be developed as proposed in accordance with the sustainable development objectives of both national and local policy.

6.51 The junction improvements would be the responsibility of the developer and the proposal would also have to comply with the transport strategy

[101] EXAM004I
[102] USS.4.1

set out in the LDP and implemented through Policies S16 and MV1 – MV4. These are standard requirements and should not jeopardise the viability of the proposed development.

Flooding

6.52 The site is in flood zone A which is considered to be at little or no risk of fluvial or tidal/coastal flooding[103]. Highly vulnerable development such as housing can be considered in such zones.

6.53 The *Rockfield Farm Desktop Drainage Report*[104] addressed surface and ground water flooding and site drainage finding that it would be necessary for proposals to ensure that flow paths were not blocked. Careful consideration would also need to be given to the capacity of drains because of possible run-off from the motorway. Groundwater flooding was unlikely to be a problem although that would have to be verified. Adequate outfalls for surface water and foul drainage would probably need to be requisitioned from Dŵr Cymru. Further site studies would be needed but it is unlikely that these would reveal insurmountable or costly constraints precluding the development of the site.

Landscape

6.54 The *Landscape Sensitivity and Capacity Study*[105] classified the site as being within a zone (MA04) of high/medium landscape sensitivity with a medium/low capacity for housing development. Apart from a narrow parcel of land to the west (MA05 where the new Vinegar Hill allocation is located) all of the land around Magor is classified similarly or has a higher sensitivity/lower capacity. The need for new housing in this area, and the County as a whole, outweighs the need to preserve the landscape.

Vinegar Hill, Undy

6.55 This is an additional allocation for 225 units adjacent to the Rockfield Farm strategic site. MAC39 and MAC40 will add a new policy, SAH6, and explanatory text.

6.56 Whilst Vinegar Hill itself would not provide safe access the site would be accessible either through the Rockfield Farm site or via Grange Road and Dancing Hill. Traffic reports submitted by the developer[106] confirm that construction on the site would not be dependent upon Rockfield Farm being completed first and the dwellings at Vinegar Hill could be delivered within the Plan period. Work to improve the roundabout to the west of Magor, possibly by changing it to a traffic light controlled junction, would be brought forward to increase highway capacity.

6.57 Most everyday services can be found in the village centre at Magor which is within walking distance, albeit including a steep gradient. Whilst public

[103] TAN 15 Development and Flood Risk page 5 figure 1
[104] USS.4.2
[105] EBS.18
[106] EXAM076

transport services are limited they are, nevertheless, reasonable in comparison with the majority of the county.

6.58 Improvements to sport facilities are in the pipeline and there are no objections from the education authority on the grounds of school capacity. The new development will enable community, recreational and other infrastructure to be improved with financial contributions which planning permission will be dependent upon[107].

6.59 The southern margin of the site is currently designated as an Area of Amenity Importance and thus subject to Policy DES2. This designation was made, at least partially, to provide a buffer for the safeguarded route of the B4245 Magor/Undy By-Pass. It is now intended that this would take a meandering and traffic-calmed course through the site and that the need for a buffer would thus be negated IMAC13.

6.60 These issues are not sufficient to preclude the allocation of the site which will make an important contribution to housing provision in the County and is consistent with the Spatial Strategy.

Former Paper Mill, Sudbrook

6.61 The site of the former paper mill was originally identified in Policy SAE2 as a protected employment site. The allocation of the site for around 190 dwellings has come forward during the examination and is the efficient use of a brownfield site which will make a helpful contribution to the County's housing requirement. These benefits outweigh concerns regarding the small size of the settlement and the distance from facilities and services. MAC41 and MAC42 will add a new policy, SAH7, and explanatory text.

6.62 The remainder of the site would no longer be a Policy SAE2 designation and the Council has recommended that the settlement boundary be drawn contiguous with the allocation. Its retention where it is now might make it easier to remediate the remaining land to the benefit of the settlement as a whole; it would not necessarily open the door to further residential development beyond the allocation. I do not, therefore, endorse this suggested change.

Tudor Road, Wyesham SAH8

6.63 The main concern with regard to this site is its proximity to the Wye Valley AONB whose boundary runs along the north east edge of the site. In proposing approximately 35 dwellings on a site which has an area of just over 2 hectares the Council is ensuring that the density will be sufficiently low to allow a development-free buffer zone on the higher parts of the site adjacent to the AONB. In addition the area of the SINC in the eastern corner could be excluded from the developed part of the

[107] Subject to Welsh Government Circular 35/95 *The Use of Conditions in Planning Permission,* Circular 13/97 *Planning Obligations* and the Community Infrastructure Levy Regulations 2010.

site. MAC43 ensures the protection from development of the sensitive parts of the site.

6.64 The special care dwelling, which was intended for a specific person, will no longer be needed. MAC43 also amends this part of the policy but that change does not affect soundness.

Cwrt Burrium, Usk

6.65 The allocation of a site for 20 dwellings in Usk, a Rural Secondary Settlement, is consistent with the town's modest size and the amount of residential development that has taken place recently.

Land south of Penperlleni

6.66 The village has a good range of facilities, including a school, doctor's surgery, shops and a public hall, which new development will support. Landscape and biodiversity considerations do not prevent the allocation of the site which will now be enlarged to provide an additional 25 units taking the total to 65 MAC47. Density would be below average to allow the mitigation of any adverse impact on landscape or biodiversity interests.

6.67 There are several objections, not to the increased amount of housing itself, but to the access which will be through an existing residential cul-de-sac. I understand residents' concerns but the WG Transport Division has no objection to the increased number of dwellings subject to a Transport Assessment and Road Safety Audit being submitted at the planning application stage. When the development is completed the traffic position in Folly View Close will be similar to that in other parts of the village, such as Chapel Mead and the road neighbouring it to the south.

Chepstow Road, Raglan

6.68 Because of its good level of services and facilities Raglan is classified[108] as one of the four Rural Secondary Settlements in the County; it is amongst the first tier villages and ranked second overall. Although there is little opportunity for employment in the village and newcomers will be likely to have to commute to jobs, additional housing will provide some extra support for facilities. In this comparatively sustainable location a residential allocation is consistent with the Spatial Strategy and Policy S1.

6.69 The site is bordered by the Nant y Wilcae and about a third is within the C2 flood zone. TAN 15 states that highly vulnerable development, such as housing, must not be located in such areas; that part of the site would thus be excluded from development. Whilst Natural Resources Wales (NRW)[109] considers that the updated 2007 flood consequences

[108] EBS.10 Function and Hierarchy of Settlements Study
[109] EXAM117a representation 2850

assessment (FCA)[110] is fit for the purpose of establishing flood risk at the site, it advises that it should be updated to provide a comprehensive assessment of the proposed residential development. This would include recommendations for mitigation measures.

6.70 The site is slightly elevated above Chepstow Road which is in the C2 flood zone for the full extent of the site's frontage. I have seen photographs of flooding in this road and appreciate that, at such times, it would not be advisable to drive into or along it. The detail of access to and from the site could be clarified with the planning application and in the light of an up-to-date FCA. A small part of the site abuts the entrance to Fayre Oaks which is not in the C2 flood zone; I have no evidence to suggest that, should a secondary, emergency-only, egress be necessary, it could not be situated there.

6.71 The Council has indicated that the C2 part of the site could be used as amenity open space or private gardens. I consider that this matter could appropriately be considered at the time of a planning application.

6.72 The Transport Statement[111] supporting the allocation indicates that, subject to some road widening, the provision of a footway and measures to reduce speed on Chepstow Road, a safe access point could be provided without encroaching onto third party land.

6.73 In the light of the constraints described above, others such as the utilities' infrastructure crossing the site, and the need to take account of general planning considerations including the privacy and amenity of existing residents, it is possible that the developable area will not be sufficient for 45 dwellings. As explained in paragraph 4.12 above the indicative number for each site is necessary for the calculation of overall housing provision and to let those with an interest in sites know what is likely to happen. If they are not achieved, however, the development would not be contrary to policy.

6.74 All in all the flood risk and traffic concerns do not cast significant doubt on the deliverability of the site and thus do not prevent its allocation; detailed matters will be deliberated and ironed out at the planning application stage. The allocation is based on robust and credible evidence and is not contrary to either TAN15 or TAN18. MAC48 will add the allocation to the renumbered Policy SAH10.

Inspector Allocations

6.75 Both the sites I recommend are the subject of SA. That for Drewen Farm[112] was carried out by the site promoter and the SA of Coed Glas[113],

[110] Included in EXAM117
[111] EXAM117 Capita Symonds August 2013
[112] EBLDP.35 representor 227 document 1
[113] EXAM125

a Council-owned site, by the Council's consultant. I am satisfied that both are in accordance with the Council's SA methodology and that no significant or harmful effects will result from them, either in isolation or cumulatively, from their allocation.

Drewen Farm, Monmouth

6.76 This site was put forward by Council officers following my preliminary finding that there was a shortfall in housing provision. The minutes of the Council meeting on 27 June 2013[114] indicate the concerns of members at this potential allocation. These included that too much development was allocated in Monmouth, possible problems with access to the site, flooding and insufficient infrastructure. In explaining why the Drewen Farm site was not approved the Council's hearing statement[115] described members as having taken the view that an increase in the scale of development proposed would be undesirable.

6.77 Although Monmouth has no railway station it is otherwise well connected and has a good level of retail, education, health, cultural, sporting and other facilities. It also has the largest employment allocation outside of Severnside which, when developed and providing jobs, will boost self-containment and reduce the amount of out-commuting from the town. Monmouth is therefore a sustainable location and, being a Main Town, is identified in Policy S1 as a main focus for residential development. Evidence presented to the examination showed that physical constraints could be overcome and there no convincing evidence that Monmouth cannot accommodate additional dwellings. I therefore recommend that part of the Drewen Farm alternative site is allocated as an extension to the Wonastow Road strategic site.

6.78 The site promoter has produced two options for the site[116]. When combined with the existing Wonastow Road allocation the first would provide a total 370 of dwellings and the second, 450. The Councils' plan of the extension[117] is a compromise between the two and, in keeping most of the development away from the Watery Lane frontage and Offa's Dyke Path, a sensible one. 80 dwellings are proposed for the 6.46 ha site. This is a low average density which will allow for substantial landscaping around the SINC and site boundaries, as befitting a landscape area of medium sensitivity. It will also enable the density of housing on the main Wonastow Road site to be reduced if need be.

6.79 With regard to traffic implications the Transport Assessment[118] prepared for the Wonastow Road allocation was based on the provision of 450 dwellings and is therefore applicable to the site as extended by the

[114] EXAM120
[115] M4/S27/MCC
[116] EBLDP.32 Representor 227 drawing nos. UG1307:10A & UG1307:11A. Both include a school on land to the west which was not part of the Council officers' additional site nor is included in my allocation.
[117] Appendix B to this report
[118] EBLDP.32 Rep 2321

Drewen Farm area. As Drewen Farm will be an extension to the Wonastow Road allocation there will be no need for an additional policy. IMAC9, IMAC10, IMAC11 and IMAC13 make the necessary amendments to Policy SAH4, accompanying text and the proposals map.

Coed Glas, Abergavenny

6.80 This site has recently become available and, being within the Abergavenny settlement boundary, was to be accounted for in the LDP as an urban housing potential site. The allocation of the site for housing through MAC44 and MAC45 will clarify the contribution it will make and ensure that it is developed for residential use. The site includes a significant number of mature, protected trees which it will be important to retain. In this urban location development would not necessarily need to be limited to two storey houses; it is thus reasonable for the indicative number of dwellings to be around 60.

Housing Allocations in Villages

6.81 In *Cross Ash* the provision of about 15 new, mainly affordable dwellings would be a valuable addition to the village as a whole and, particularly, would give additional support to the school. Both sites would be located close to the junction to the south where they would consolidate the existing development at this entrance to the village.

6.82 The main issue for the *Well Lane, Devauden* allocation is whether improved access could be provided, particularly for pedestrians travelling to and from the village centre. Third party land will not be made available as it is owned by two objectors to the site. Various alternative schemes[119] have been put forward for the provision of a footway. The layouts provided in EXAM029 have been criticised by representors as based on inaccurate measurements but a further letter[120] explains the approach satisfactorily. The three options set out in EXAM062 are also plausible although one must be discounted as it relies on third party land which is unlikely to be available. Overall I am confident that the development of the allocated site is feasible in traffic and access terms.

6.83 The appeal decision [121] dismissing a similar proposal on the site is nearly nine years old; in the intervening period policies and guidance have changed. Furthermore the proposal did not include what that inspector considered to be sufficient traffic calming measures. Such shortcomings could be addressed in any scheme for the Well Lane site.

6.84 *Dingestow* has a good range of facilities and sufficient public transport, particularly from the bus stop on the main route to Monmouth, to enable residents to work in Monmouth or Newport. EBS.10 ranked it at 20th out

[119] EXAM029 Letters from ADL Transportation including layouts for new footway 1st & 14th May 2013
EXAM062 *Land at Well Lane, Devauden - Design Review Report* Capita Symonds June2013
[120] EXAM099
[121] RRD.002

of 56 villages and it is also the largest settlement in the Mitchel Troy community council area where there has been shown to be a significant housing need. These characteristics justify the allocation despite the site itself being somewhat remote from the main body of the village.

6.85 The allocated site west of *Grosmont* is adjacent to residential properties and existing development along Poorscript Lane has already eaten into the agricultural land west of the village. To the north of the site a large garden extends over much of the gap between the allocated site and the houses along the road to Abergavenny. In the circumstances the allocated site would not intrude excessively into the adjoining countryside.

6.86 There is a dispute concerning rights to the land adjacent to the turning head in Poorscript Lane and access to the allocated site across that land cannot be assured. EXAM063[122] describes two options for access to the site from Bevan Court and illustrates that feasible access alternatives are available.

6.87 It is suggested that the boundaries of the allocation at *Little Mill* be amended slightly[123] to allow for a centrally placed access road. This is a sensible proposal which has been incorporated into the LDP through a focussed change[124]. The provision of around five dwellings, three of which would be affordable, in *Llanddewi Rhydderch* will help the settlement's vitality and to meet housing need in the Llanover community council area.

6.88 With its good level of village services, including a shop, primary school, community hall, well-equipped play area and bus services to Chepstow and Monmouth, *Llandogo* is rightfully identified as a Main Village where small scale residential development would be appropriate. Whilst all assessments indicate that the allocated site is otherwise suitable it is uncomfortably close to two poultry units which, if not currently so, have the potential to be utilised at any time.

6.89 Advice from an environmental health officer[125] was that he was 'very concerned' with regard to 'the extremely close proximity of the proposed housing to the [poultry] units' and that there was a strong potential for nuisance complaints if the two uses proceed together. As the poultry units are already in place there is no mechanism for requiring their operator to mitigate any nuisance by reason of odour, noise and so on. The environmental health officer also explains that he is unaware of any mitigation measures that could reasonably be expected from a housing developer apart from considering the orientation of the houses and gardens in relation to the poultry units. Essentially the most effective

[122] Capita Symonds *Design Review Report*
[123] As shown in representation 2334.D1, site ASB049
[124] FC 34
[125] EXAM059

control would be to have a reasonable distance between a unit and dwellings.

6.90 The delivery of around 15 dwellings on the site during the Plan period is therefore at serious risk; this is such that its allocation for housing should not be retained IMAC12. The settlement development boundary, within which the proposed site is included, should however remain at its current extent. This will allow for future residential development of the site, or part of it, should circumstances regarding the poultry units alter or reasonable and effective mitigation be possible.

6.91 Two alternative sites have been put forward in Llandogo. These are both to the south of the A466 in the open, river-plain area which, although closer to the village services, is less densely developed than north of the road. Along with the rest of the village and its surrounds the alternative sites are in the Wye Valley AONB where LDP Policy LC4 requires that any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. In this open, visible area, which is also an important feature of the designated conservation area, residential development would be obtrusive and, encroaching into the undeveloped margins of the river, would be contrary to that policy and also to criterion a) of Policy HE1.

6.92 It might have been possible to overcome other restrictions at the sites, such as parts of them being within the C2 flood zone, but their allocation is ruled out by the fundamental constraints of their location and visibility.

6.93 *Llanellen* is comparatively close to the much larger and more urban settlement of Llanfoist; it benefits from a good public transport service to there and Abergavenny. There is no school in Llanellen but a number of other valuable facilities including a shop, village hall, church and café. Much of the housing need identified in the Llanfoist Fawr community council area could be met in Llanfoist but there is still a need for some affordable housing in Llanellen. The allocated site will provide around 15 dwellings including nine affordable units.

6.94 *Llangybi* is perhaps more remote than Llanellen but it has a reasonable range of facilities including a bus service sufficient for residents to travel to and from Newport or Monmouth for employment. The allocation of a site for around 10 dwellings will contribute significantly to the housing need identified in the area by the Welsh Rural Housing Enabler Study of 2007.

6.95 At the allocation in Llanishen to the rear of *The Carpenters Arms* Policy SAH8 (renumbered Policy SAH11 as a result of MACs) would allow a maximum of 5 dwellings. From discussion at the hearing it seems as though the site might be able to accommodate 7 reasonably-sized dwellings which, given the difficulty in finding suitable sites in the county, would be helpful. MAC50 removes the word 'maximum' replacing it with

'around' which would enable this increase. Such changes would be subject to the proviso that there was no adverse impact on village form and character and surrounding landscape, also added to the policy by MAC50. MAC49 amends the explanatory text accordingly.

6.96 *Llanvair Kilgeddin* is a very small settlement with few facilities but it has a school. In the light of this, together with the high level of housing need in the Llanover community council area and few opportunities to meet this, the allocation of a site for around 5 dwellings is reasonable.

6.97 There is not a traditional shop in *Mathern* but the petrol station and nearby farm shop will meet many daily needs. The bus service from the village itself is very limited but that along the A48 is good. All in all Mathern is a reasonably sized settlement where an allocation for a modest number of dwellings, located away from sensitive landscape and conservation interests, will make a contribution to the identified housing need in the Mathern community council area. The position in the neighbouring village of *Pwllmeyric* is comparable and for similar reasons the allocation of a site at its edge for around 15 dwellings is reasonable.

6.98 Several of the matters which cast doubt on the allocation of the site in *Penallt*, for example safe access to it, the biodiversity value of the frontage hedge and its location in the Wye Valley AONB, might be assuaged if the site was not developed with the maximum number permitted under the original policy. Policy SAH8 (renumbered SAH11) is amended by MAC50 and provides for 'around' 10 dwellings at this site. Other matters such as land drainage and infrastructure issues could be dealt with at the planning application stage and do not make the allocation unsound. The settlement boundary is drawn around the site linking it into the village and differentiating it from the remainder of the field; no precedent will be set for the development of that field as a whole.

6.99 Two sites, each for around 5 dwellings and opposite one another, are allocated in *Shirenewton.* The Highways Authority raises no significant concern over access to the site and it is not sufficiently close to the conservation area to have a detrimental impact upon it. Subject to the stipulations included in Policy SAH8 (now Policy SAH11) the allocation in *Trellech* will be deliverable. In *Werngifford* the policy requirements for the allocation concern the C2 flood zone, the proximity of a Scheduled Ancient Monument and the need for public open space; as long as these are met housing on the site can be properly delivered.

Conclusion

6.100 With regard to the allocations my overall conclusion is that, subject to the binding changes recommended, their overall scale, type and distribution achieves the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy. Relevant alternatives have been considered and the identification of the allocations

is based on a robust and rational site selection process. The policies and requirements for each housing site are clear reasonable and sufficient.

Recommendation

6.101 That in order to make the Plan sound the following changes are required:

MAC30, MAC31, MAC32, MAC33, MAC34, MAC35, MAC36, MAC37, MAC38, MAC39, MAC40, MAC41, MAC42, MAC43, MAC44, MAC45, MAC47, MAC48, MAC49, MAC50, IMAC9, IMAC10, IMAC11, IMAC12, IMAC13.

7 Economy and Employment

Employment land provision

7.1 The main evidence for the employment strategy set out in the LDP is the *Employment Sites and Premises Review*[126] which was carried out for the Council by BE Group and published in August 2008. An *Addendum Report*[127] was published two years later to address employment-related issues which had arisen during the preparation of the LDP, primarily from the SA and representations from WG. The base evidence was sufficiently specific and up-to-date, therefore, to inform the allocations set out in the Deposit LDP published in September 2011.

7.2 The take-up of employment land in the County has been slow over recent years and most of the sites for new industrial and business development listed in Policy SAE1 are part of or adjoining existing employment areas; several are carried over from the UDP. Based on the trend in land take-up from 1991-2009 22.68 ha of employment land would be needed from 2009 to 2021. New employment development must be consistent with the spatial strategy and the Council has, on the whole, provided sites in the Main Towns and Severnside which are consistent with the size of settlements.

7.3 Significant exceptions are the three large sites to the west of Magor which amount to about 37 ha of undeveloped land. These are strategic sites which, being close to the M4, could have regional significance and attract inward investors. They are close to the B4245 which will provide a direct and convenient route to and from the motorway for frequent and heavy traffic whilst largely avoiding residential areas.

7.4 At the hearings I discovered that these sites were, to some extent, aspirational and that it is unlikely that they will be completely developed during the LDP period. It is, however, essential for the local economy and for the benefit of the county and its residents to have a range of

[126] EBS.7
[127] EBS.8

sites and premises available to meet a wide variety of business and industrial uses as they arise. The Council's additional note on employment[128], whilst not a statistical update, revealed that this was already proving fruitful; some enquiries for Newhouse Farm which it was not possible to meet had been directed to sites in Magor. I find that the employment allocations strategy is realistic, appropriate and founded on a robust and credible evidence base, in line with soundness test CE2.

7.5 The allocations set out in Policy SAE1 provide just over 50 ha of land for new industrial and business development in addition to the employment allocations on the strategic sites at Wonastow Road, Rockfield Farm, Crick Road and Fairfield Mabey. Whilst the connection between employment and housing land is tenuous – there can be no certainty that significant numbers of new residents will be able to work at businesses in the adjoining new employment areas – it is part of a sustainable strategy to at least create that opportunity in the provision of some employment land as part of strategic sites. Such allocations could contribute to the Council's aim of reducing out-commuting from the County.

7.6 It is estimated in Policy SAE1 that the allocations, not including those on the strategic mixed-use sites, have the potential to create well over 6,000 jobs. This has led to a commonly-expressed concern that there is an imbalance between employment and housing allocations, particularly in the Severnside area. This view was supported by a report commissioned by several developers and the HBF and prepared by Nathaniel Lichfield & Partners (NLP)[129]. Using its HEaDROOM framework, which analyses key variables and presents a variety of scenarios, the report found that the economic growth model required at least 5,900 dwellings whilst the demographically-led model would result in a significant loss of jobs.

7.7 The methodology behind the study appears robust and reliable; as such its findings lend weight to my conclusion that the amount of housing originally allocated in the LDP was insufficient. The numbers of dwellings recommended, however, would in all likelihood not be deliverable during the LDP period. Such an increase in housing from the original LDP requirement would also constitute a fundamental alteration to the Plan's strategy. Furthermore, if housing provision were made to meet the maximum potential level of employment growth and that growth was not achieved, the oversupply of housing land would significantly exacerbate levels of out-commuting. I have not, therefore, gone as far as that report in recommending an increase in housing numbers. The imbalance will be addressed to an extent by the additional housing allocations.

7.8 With regard to the employment policies MAC21, MAC22, MAC25 and MAC26 will strengthen the wording of Policies S9 and E1 and

[128] EXAM031
[129] M3/S3-5/17 Appendix 1

accompanying text to ensure that identified employment sites are adequately protected from development for other uses.

Rural Enterprise

7.9 Agriculture is a significant element of the rural economy of Monmouthshire. Its importance is stated in the LDP[130] and recognised particularly through Policies RE3, RE4 and RE5; these permit development which would make a positive contribution or be necessary for agriculture subject to criteria. In order to protect the best and most versatile agricultural land from inappropriate development the LDP relies, appropriately, on PPW. The paragraph reference in the LDP is not to the current edition of PPW. IMAC6 removes the reference in order that is does not become out dated again.

7.10 The Cattle Market at Abergavenny has been the subject of a protracted and complicated process including a compulsory purchase order and judicial review. That has now concluded with planning permission granted for the redevelopment of the site and construction of the replacement cattle market near Raglan being underway. The matters surrounding the cattle market, not least because of their timing, have been kept separate from the LDP but their omission does not challenge its coherence or its soundness. For clarity MAC23 includes a brief update on the position in the text of the Promoting Rural Enterprise section.

Tourism

7.11 Many visitors are attracted to Monmouthshire by the quality and diversity of its landscape and the wealth of heritage assets. Tourism is a vital component of the County's economy and the strategy is to encourage and develop it whilst giving adequate protection to those elements which attract visitors. This approach is supported by a study into tourist accommodation development opportunities in Monmouthshire[131]; it found that its sensitive landscape and built heritage meant that the scale of such development and its potential visual and operational impact would need careful management if the right development was to be directed to the optimum locations. The strategy is encapsulated in the strategic Policy S11 and development management Policies RE6 and T1 – T3.

7.12 There is a general presumption in the LDP against newly built residential development in the open countryside, that is, outside settlement development boundaries. In line with this principle visitor accommodation is allowed outside of these where it is ancillary to existing hotels, though it can only be provided in the open countryside if it is though the re-use and conversion of existing buildings. This is not an unduly restrictive approach, particularly since Policy RE6 will permit new recreation, tourism or leisure facilities of an appropriate scale in the countryside in exceptional circumstances.

[130] Para 6.2.25
[131] EXAM091

7.13 The tourism strategy and policy framework set out in the LDP properly reflect the economic benefits of tourism in the rural area and County as a whole. It is not necessary to allocate additional sites for new visitor accommodation under Policy SAT1.

Conclusion

7.14 The overall scale, type and distribution of the allocated employment sites achieve the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy. Their identification is based on a robust and sufficiently up-to-date evidence base and the policies and requirements for them are clear, reasonable and sufficient.

Recommendation

7.15 That in order to make the Plan sound the following changes are required:

MAC21, MAC22, MAC25, MAC26, IMAC6

8 Other Matters

Retail

8.1 Strategic Policy S6 identifies a hierarchy of retail centres in the County. This is supported and supplemented by development management policies RET1 to RET4 which aim to protect the retail function, and thus the vitality and viability, of town and local centres. This approach is consistent with PPW.

Efficient resource use and flood risk

8.2 The first section under the Valuing Our Environment heading was entitled Sustainable Development but will be renamed by MAC24 and MAC27 to reflect that it and the strategic policy, S12, cover efficient resource use and flood risk only. This is necessary for coherence and compliance with soundness test CE1. The cross reference to the principles of sustainable development in PPW and rewording of Policy S12 are sufficient to quell concerns that this section does not recognise all the elements of sustainable development. In addition the LDP's vision and objectives make it clear that sustainability is woven through the strategies and at the heart of all the Council's planning considerations.

8.3 Site-specific flood risk matters are addressed in the section dealing with individual allocations.

Waste

8.4 Policy S14 sets out the Council's commitments with regard to waste and refers to the requirement for up to 5.6 ha of land for new, in-building waste management facilities. It has been suggested that this land should be specifically allocated. Given the large amount of land and sites

identified in Policy SAW1 as suitable for waste facilities, and that the required amount could be as low as 2.2 ha, allocation is not necessary. Indeed, in preserving sites for the sole development of waste facilities and excluding other employment uses from them economic growth might be hindered. Action need only be taken if monitoring reveals that the supply of suitable land for waste facilities is in danger of falling below 5.6 ha.

Minerals

8.5 WG's representation on this matter was that aggregate safeguarding areas on the proposals map should be amended to be in line with the British Geological Survey (BGS)'s Aggregates Safeguarding Map of Wales. Those identified in the LDP are based on the findings of the Former Gwent study[132].

8.6 The basis on which the Former Gwent study was carried out was explained in a supplementary paper[133] and at the hearing. It followed guidance on minerals safeguarding produced by the BGS[134]. In particular this recommends that safeguarding areas should be based on the best geological information existing at the time of designation, that consideration should be given to the economic importance of various minerals now and in future, and that large deposits may not need to be protected in their entirety. The study also used the same geological mapping as the subsequent BGS Welsh map and included consultation with the industry. With regard to sand and gravel resources it appears that the Former Gwent study has drawn upon more sources than the BGS map, consequently providing a more detailed picture.

8.7 WG's concerns are with safeguarding margins or buffer zones. In order to address these IMAC13 will add the buffer zones to the Proposals Map.

Landscape

8.8 The majority of Monmouthshire's beautiful and varied landscape has been assessed to be worthy of designation within an SLA which, by reason of the extent of this coverage, would render that identification almost meaningless. The LDP, therefore, relies upon a criteria-based policy, LC5, to supplement its strategic Policy S13 and the LANDMAP Landscape Character Assessment which, eventually, will categorise every part of Wales (apart from Cardiff and Swansea centres).

8.9 Policy LC5 requires a landscape assessment to be carried out for any development proposal which would have an impact upon the landscape character of the surrounding area. Landscape character areas and types, based on a LANDMAP assessment, will be identified in an SPG which will also assist applicants for planning permission with that task and include

[132] Former Gwent Aggregates Safeguarding Study, May 2009 EBS.9
[133] M9/S15/MCC supplementary
[134] BGS Guide to Mineral Safeguarding 2008

an easy guide. The *Landscape and Development Checklist* and *Interim Landscape Position Statement*[135], which are already in use prior to the preparation of the SPG, state that where proposals are of any significance, by reason of their size, prominence or impact, the developer will be expected to employ a chartered landscape architect.

8.10 Given the special value of most of the Monmouthshire landscape the requirement for a landscape assessment is not unduly onerous or unreasonable, particularly as it is likely that their scale and complexity will be commensurate with that of the proposal. All in all Policy LC5 provides an appropriate approach to the protection of landscape character. It is based on robust and credible evidence and is consistent with national policy.

Green Belt

8.11 An area of land on the western edge of Chepstow, between the town and villages of Pwllmeyric and Mathern, is designated as Green Belt in the LDP under Policy LC6. This designation would fulfil some of the purposes set out in PPW, particularly preventing coalescence, safeguarding the countryside from encroachment and protecting the setting of Chepstow. There are however other policies in the LDP which serve this purpose. Primary amongst these is Policy LC1 which presumes against new built development in the open countryside. A limited number of uses which would be appropriate in a rural setting may be permitted as long as they would meet criteria governing their visual and environmental impact. The green wedge designation formerly applied also had the same functions as Green Belt whilst much of the land is also protected by its conservation area status.

8.12 The significant difference between Green Belt and green wedge is its permanence; Green Belt boundaries should be altered only in exceptional circumstances and land within should be protected beyond the LDP period. PPW also states that before designating land around an urban area as Green Belt the local planning authority must consider and, importantly, justify which would be the most appropriate means of protection[136].

8.13 Chepstow is tightly constrained by its location on the River Wye which demarcates the national boundary with England, is covered by various conservation designations (such as the SSSI and SAC) and is the basis for a C2 flood risk zone. Immediately to the north and north west of the town is the Wye Valley AONB. The demands for housing and employment development in and around Chepstow, which will be of fundamental importance to its vitality and viability, indicate that land beyond that allocated in the LDP will be needed, probably by the time of the next LDP review. The area to the west of Chepstow might be the

[135] EXAM57
[136] PPW 4.8.6

least harmful location for such development in which case the Green Belt designation would be unduly constraining.

8.14 Furthermore, the designation does not appear to have been soundly based on a formal assessment of its contribution to urban form and the location of new development as required by PPW[137]. That the area will have been retained as a green wedge beyond the end of the UDP period in which it was first designated is not an indication that permanence can be assured or is desirable. The Green Belt designation is therefore deleted by IMAC7. There is a need, however, for the land to be protected from development in the short term and IMAC8 restores the green wedge designation.

Public and Amenity Open Space

8.15 The LDP's strategy with regard to community and recreation facilities is to protect those existing and to encourage or require the provision of new ones. Subject to FC1, this is clearly set out in the strategic Policy S5, development management Policies CRF1 – CRF3 and the accompanying text. The policies are evidenced by separate green space[138] and open space[139] studies which have included surveys of the main settlements. The standards are the same as those in the UDP which, in turn, are based on the National Playing Fields Association (NPFA)'s Six Acre Standard. In implementing Policy CRF2 and Policy CRF3 decisions will take account of any deficiencies or otherwise in the quantity and quality of facilities in the surveyed settlements.

8.16 As explained in TAN 16[140] the NPFA is now Fields in Trust (FIT) and the Six Acre Standard has been replaced by 'Benchmark Standards' which, TAN 16 advises, should be helpful for authorities formulating local standards of provision. These recommend 1.6 ha per 1000 population for outdoor sports and 0.8 ha for children's play space which are similar amounts to those set out in Table 1 of the LDP and the total for outdoor playing space required in Policy CRF2.

8.17 The quantity and quality of allotments has been surveyed; several studies and reports have been taken into account in setting the standard and the requirement set out in Policy CRF2 is evidence-based and reasonable.

8.18 Whilst the standards used in the LDP are national rather than local, the methodology of the studies and the policy approach reflects the varying provision of open space in Monmouthshire's main settlements.

[137] PPW para. 4.8.1
[138] EBS.11
[139] EBS.24
[140] TAN 16 para 2.9

Design

8.19 It will be essential to the success and public acceptance of housing development in Monmouthshire that high standards of design and appearance are achieved on both small and strategic sites. During the last decade there has been an increasing emphasis on good design and this is encapsulated in LDP Policy DES1. Its requirements, set out in detailed and comprehensive criteria, will provide a strong framework for ensuring that all development is of a high-quality, sustainable design which respects the local character and distinctiveness of the environment.

8.20 In addition, the Council's thorough procedure for evaluating schemes, and the care it already takes in doing this, provide reassurance that the stringent requirements of Policy DES1 will be implemented.

Infrastructure

8.21 Policy S7 deals with the provision of infrastructure but is rather general in its approach. MAC19 amends the policy to clarify that the calculation of appropriate contributions for each site will have due regard to the viability of the proposed development. It also explains that the priority given to various types of contribution will depend upon individual site circumstances which is necessary to ensure compliance with Welsh Government Circular 35/95, Circular 13/97 and the Community Infrastructure Levy Regulations 2010.

8.22 At my request the Council provided a schedule[141] which sets out general information as to the works required at each strategic site, their timing, costs and the party responsible for these. This should be updated to cover the additional sites and included as an appendix to the plan; it will clarify the mechanisms of delivery and confirm compliance with soundness test CE3. IMAC5

8.23 SPG is also to be provided; until that is in place the interim document *Approach to Planning Obligations*[142], which was due to be endorsed soon after the hearing session in June, is being used in negotiating planning schemes. This includes a section on CIL and an extract from the infrastructure plan. Whilst it is not part of the LDP it indicates that the Council already has a mechanism in place for negotiating and delivering infrastructure as well as a clear notion of how this will be progressed following adoption of the LDP. MAC20 updates the position with regard to CIL.

[141] EXAM007R-MCC Appendix 3
[142] M11-S17-MCC Appendix 1

Transport and Accessibility

8.24 An email from the transport department of WG[143] confirmed that the M4 Safeguarding Route shown on the proposals map was accurate and up-to-date.

8.25 The transport policies and proposals present a coherent movement strategy for the County. They will achieve the relevant objectives of the LDP, particularly in providing opportunities for integrated sustainable transport, for increased walking, cycling and use of public transport, and for reducing reliance on the private car and the need to travel.

Monitoring

8.26 The Monitoring Framework sets out the key indicators and targets that will be used to monitor delivery of LDP policies and proposals. In the light of comments and discussion it has been amended to identify specific targets and triggers. Existing triggers have been lowered or brought forward to ensure the early detection of problems and enable timely remedial action or alternatives to be introduced which will take effect during the Plan period. Effective monitoring is essential and subject to MAC51, MAC52, MAC53, MAC54, MAC55 and MAC56 I am satisfied that the LDP includes clear mechanisms for implementation and monitoring.

Conclusion

8.27 My conclusion on the other matters is that, subject to the changes recommended, the policies and proposals achieve the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy. They are based on robust and credible evidence and are clear, reasonable and justified.

Recommendation

8.28 That in order to make the Plan sound the following changes are required:

MAC19, MAC24, MAC27, MAC51, MAC52, MAC53, MAC54, MAC55, MAC56, IMAC5, IMAC7, IMAC8

9 Overall Conclusions

9.1 I conclude that, with the binding changes necessary for soundness that have been recommended in Appendix A of this report, the Monmouthshire Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural, consistency and coherence and effectiveness tests of soundness in LDP Wales.

Siân Worden

Inspector

[143] EXAM058

Appendix A
Monmouthshire Local Development Plan – Schedule of Matters Arising Changes (MACs)
MACs in grey shading are required to make the Plan sound and are binding on Monmouthshire County Council, all other MACs are included because they improve clarity, precision, coherence and consistency. The alterations will result in the renumbering of paragraphs. The MAC references and chapters in the following table relate to the paragraph numbers set out in the submitted plan. The changes to the Plan as amended by the focused changes and minor changes are indicated in the form of **bold** text for additions and ~~strikethroughs~~ for deletions.
The MACS prefixed with an 'I' are Inspector changes (IMAC). Additional text proposed by the Inspector is indicated in ***bold italics***.

MAC Number	Section in LDP	Details of Change
MAC 1	Chapter 1	MCC to update Chapter 1 where relevant as set out in Appendix 1
MAC 2	Paragraph 2.20	Amend paragraph 2.20 as follows: 'In consultation with a range of stakeholders, the SEWSPG agreed on a provisional distribution of the required housing among the 10 local authorities in the region based on factors such as past house building rates, current land availability and environmental ~~capacity~~ **constraints**…'
MAC 3	Chapter 2	Insert paragraphs 4.30-4.36 (The Council's Priorities) after paragraph 2.57 Chapter 2 and amend as follows (with consequential changes to the subsequent paragraphs in Chapter 2): ~~4.30~~ 2.58 In determining the spatial distribution of development for the LDP, it is clear that improving access to services and tackling climate change are key corporate priorities that the LDP can have an influence over. This is reflected in LDP Objective 14 **(as set out in Chapter 4)**, relating to achieving sustainable accessibility. ~~4.31~~ 2.59 LDP objectives seeking to protect the environment relate to aspects of the Community Strategy priority of tackling climate change and the broader ambition to preserve the distinctive character of Monmouthshire set out in point (2) of the Vision statement. ~~4.32~~ 2.60 The provision of affordable housing is also a key corporate priority that the LDP can have a significant influence over. This is reflected in LDP Objective 4. ~~4.33~~ 2.61 Other LDP objectives relating to the theme of building sustainable communities also suggest a

MAC Number	Section in LDP	Details of Change
		broad distribution of development that addresses the needs of rural areas as well as of the towns, particularly objectives 1 and 3. ~~4.34~~ 2.62 Another element of a successful sustainable community is that it is prosperous with good access to employment opportunities, as reflected in parts of point (1) of the LDP Vision statement and objective 7. ~~4.35~~ 2.63 Such objectives are often interrelated. Promoting a 'green economy', for instance, can help in reducing impacts on climate change and provide local employment opportunities. ~~4.36~~ 2.64 All the Key Issues and Objectives set out ~~earlier in this Section~~ **in Chapter 4** play an important role in providing the framework for the policies set out in this LDP. To reflect the Community Strategy and take account of the corporate objectives of the Council the following matters are identified as the main priority areas for the LDP to deal with: • Supporting communities • Provision of affordable housing • Promoting enterprise • Tackling climate change • Protecting the environment • Providing opportunities for reducing the need to travel • Preserving Monmouthshire's distinctive character
MAC 4	Paragraph 2.64	Amend paragraph 2.64 (now 2.71) as follows: In April 2013, the new Single Integrated Plan (SIP) ~~will~~ replace**d** the current Community Strategy, Children and Young People's Plan, Community Safety Plan and Health, Social Care and Well-being Strategy. Based on a rich and comprehensive unified needs assessment process and wide reaching engagement process, it ~~will~~ aim**s** to drive improvement within the County, with a specific focus on a certain number of priorities which will form the core agenda for improvement. **Although the LDP has been prepared in the context of the Community Strategy, the SIP addresses similar issues and priorities including affordable housing, business and enterprise, accessibility and environmental protection / enhancement.**

MAC Number	Section in LDP	Details of Change
MAC 5	Chapter 3	Amend Chapter 3 to include paragraphs 4.2 to 4.25 from Chapter 4 (Spatial Issues) as set out in Appendix 2
MAC 6	Paragraphs 4.3-4.25	Amend Chapter 4 to delete paragraphs 4.2 to 4.25 (Spatial Issues) with consequential paragraph renumbering as set out in Appendix 3.
MAC 7	Paragraph 4.26 – LDP Vision	Amend bullet point 2 of the LDP Vision as follows: • 'The newer settlements in ~~the south of the County~~ **Severnside** will have improved infrastructure that helps to rectify the imbalance caused by recent residential growth having taken place without the **local jobs** ~~employment~~ and community **facilities** ~~infrastructure~~ to match. Regeneration will have helped the area to take advantage of it strategic location at the 'Gateway' to Wales with good access to the employment markets of Newport, Cardiff and Bristol.'
MAC 8	Paragraph 4.27	Amend Objective 2 as follows: 'To sustain and enhance the main County towns of Abergavenny, Chepstow, Monmouth and Caldicot as vibrant and attractive centres **serving** ~~that met the needs of~~ their own populations and those of their surrounding hinterlands.'
MAC 9	Paragraphs 4.28-4.37	Amend Chapter 4 to delete paragraphs 4.28-4.37 (The Council's Priorities) as set out in Appendix 3.
MAC 10	Key Diagram	Key Diagram changes – see Appendix 4 Key Diagram amended as follows: • Symbol denoting the settlements deleted • Settlement of Llanfoist labelled • Crick Road site (SAH2) amended to 'strategic mixed-use' allocation • Include additional strategic sites: SAH6 Land at Vinegar Hill Undy and SAH7 Sudbrook Paper Mill • Include additional urban site: SAH9 Coed Glas, Abergavenny • Include additional rural secondary site: SAH10(iii) Land at Chepstow Road, Raglan
MAC 11	Policy S1	Amend the second and third paragraphs of Policy S1 as follows:

MAC Number	Section in LDP	Details of Change
		The Severnside sub-region consists of the settlements of Caerwent, Caldicot, Magor, Portskewett, Rogiet, Sudbrook and Undy. A smaller amount of new housing development is provided in the Severnside sub-region, particularly at Magor/Undy**,** ~~and~~ Caldicot/Portskewett **and Sudbrook**. The Rural Secondary Settlements are Usk, Raglan, Penperlleni and Llanfoist. A small amount of new housing development is directed to the Rural Secondary Settlements of Usk**, Raglan** and Penperlleni**.**
IMAC1	Paragraphs 5.12-5.13	Amend paragraphs 5.12 – 5.14 as follows: Housing Provision 5.12 The chosen level of housing provision in the Monmouthshire LDP is ***4500*** ~~**4450**~~ ~~000~~ dwellings over the period 2011-21. ~~The justification for choosing this level of housing provision is set out in a supporting background paper.~~ It accommodates the level of growth indicated by the 2008-based Welsh Assembly Government Household projections, which project an increase for the County of 3,969 households between 2011-21 (or about 4,100 dwellings), with a small allowance (10 dwellings per year) to be met in that part of Monmouthshire included in the Brecon Beacons National Park**, together with an additional requirement for the period *2006* ~~2008~~ - 2011**. **Planning Policy Wales requires local authorities to use the latest Welsh Government household projections as the starting point for assessing housing requirements.** ~~This annual rate of 400 dwellings per annum has been used for the period from *2006* – 2011, therefore, to provide a starting point for establishing the required LDP housing provision that corresponds with the base date of the 2008 Household projections. Based on this requirement of 400 dwellings per annum from *2006* – 2011 less the number of dwellings completed during that time there is a shortfall in the housing provision of about 450 dwellings, which has been added to the 4,000 dwellings target.~~ ~~5.13 This level of growth also helps achieve the 'Regional Collaboration' growth option of 350 dwellings per year, which reflects the regional apportionment agreed amongst the members of the South East Wales Strategic Planning Group (SEWSPG) and on which the LDP Preferred Strategy was based. While the LDP period begins in 2011, the base date for the regional apportionment was 1st April 2006. The adopted Monmouthshire UDP allowed for a range of 240 to 300 dwellings per year between 2006 and 2011. Due to the adverse economic climate the actual level of growth for the five years 2006-11 has been 236 dwellings per year. In reality, therefore, the rate of growth~~

<table>
<tr><th>MAC Number</th><th>Section in LDP</th><th>Details of Change</th></tr>
<tr><td></td><td></td><td>~~required to achieve the regional apportionment is around 400 dwellings per year over the LDP period 2011-21.~~

5.13 This level of housing provision will be met by identifying opportunities for around 4950 ~~4,900~~ dwellings to enable a 10% flexibility allowance.

5.14 Policy S2 below sets out how this~~e~~ figure of 4950 ~~4,~~~~900~~~~000~~ dwellings ~~will be~~ is being achieved. An Urban Housing Potential Study (UHPS) was carried out on behalf of the Council by Baker Associates in July 2008. The findings of this Study have been updated to take account of changing site circumstances and the findings of the most recent Joint Housing Land Availability Study (i.e. April 2013 ~~1~~) to give the '~~Identified UHP~~ Large Site Windfall' figures in column ~~3~~ c) of the table. 'Small Site Windfall' estimates are given in column ~~5~~ d) of the table. This is development that can be predicted to happen based on past trends in each settlement or category of settlements but which cannot be specifically identified, because it will come from conversions, infill development, redevelopment and change of use. The identification of specific opportunities for new housing sites in Main Villages will allow for an increase in provision of affordable housing in rural communities.</td></tr>
<tr><td>IMAC2</td><td>Policy S2</td><td>Amend Policy S2 as follows:

Policy S2 – Housing Provision
Provision will be made to meet a requirement for 4500 ~~4,000~~ ~~4,450~~ residential units in the plan period 2011-2021. This need will be met by identifying opportunities for around 4950 ~~4,900~~ dwellings to enable a 10% flexibility allowance as follows:

<table>
<tr><th>~~Settlements~~</th><th>~~Committed 1/4/2011~~</th><th>~~Identified UHP~~</th><th>~~Windfall~~</th><th>~~New Sites~~</th><th>~~Total~~</th></tr>
<tr><td>~~Abergavenny~~</td><td>~~99~~</td><td>~~82~~</td><td>~~75~~</td><td>~~250~~</td><td>~~506~~</td></tr>
<tr><td>~~Chepstow~~</td><td>~~57~~</td><td>~~169~~</td><td>~~46~~</td><td>~~240~~</td><td>~~512~~</td></tr>
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MAC Number	Section in LDP	Details of Change

~~Monmouth~~	~~190~~	~~119~~	~~46~~	~~400~~	~~755~~
~~Caldicot~~	~~174~~	~~26~~	~~24~~	~~0~~	~~224~~
~~Portskewett~~	~~21~~	~~0~~	~~12~~	~~250~~	~~283~~
~~Magor/Undy~~	~~103~~	~~37~~	~~22~~	~~200~~	~~362~~
~~Caerwent~~	~~132~~	~~0~~	~~19~~	~~0~~	~~151~~
~~Rogiet~~	~~23~~	~~25~~	~~5~~	~~0~~	~~53~~
~~Sudbrook~~	~~6~~	~~46~~	~~1~~	~~0~~	~~53~~
~~Usk~~	~~15~~	~~0~~	~~17~~	~~20~~	~~52~~
~~Raglan~~	~~15~~	~~0~~	~~16~~	~~0~~	~~31~~
~~Penperlleni~~	~~7~~	~~50~~	~~3~~	~~40~~	~~100~~
~~Llanfoist~~	~~144~~	~~0~~	~~3~~	~~0~~	~~147~~
~~RURAL~~	~~257~~	~~0~~	~~277~~	~~215~~	~~749~~
~~TOTAL~~	~~1243~~	~~554~~	~~566~~	~~1665~~	~~3978~~

Settlements	a) Committed 1/4/2013	b) Completions 2011 - 2013	c) Large Site Windfall	d) Small Site Windfall	e) New Site Allocations	Total
Abergavenny	97	19	~~125~~ *65*	75	~~250~~ *310*	566
Chepstow	220	29	30	46	350	675
Monmouth	197	86	11	46	~~405~~ *485*	~~745~~*825*
Main Towns	514	134	~~166~~ *106*	167	~~1005~~ *1145*	~~1986~~ *2066*
Caldicot	67	119	0	24	0	210
Portskewett	8	19	0	12	285	324
Magor/Undy	53	61	0	22	495	631
Caerwent	54	79	0	19	0	152
Rogiet	8	15	25	5	0	53
Sudbrook	3	4	46	1	190	244
Severnside Settlements	193	297	71	83	970	1614

MAC Number	Section in LDP	Details of Change

Usk	**5**	**11**	**0**	**17**	**20**	**53**
Raglan	**11**	**3**	**0**	**16**	**45**	**75**
Penperlleni	**8**	**1**	**45**	**3**	**65**	**122**
Llanfoist	**63**	**77**	**102**	**3**	**0**	**245**
Rural Secondary Settlements	**87**	**92**	**147**	**39**	**130**	**495**
RURAL	**218**	**73**	**14**	**277**	***~~215~~ 200***	***~~797~~ 782***
TOTAL	**1012**	**596**	***~~398~~ 338***	**566**	***~~2320~~ 2445***	***~~4,892~~ 4957***

Explanation:

a) Sites with planning permission at 1/4/2013, as identified in the 2013 Joint Housing Land Availability (JHLA) Study: large sites of 10 or more that are in the 5-year land supply and all small sites.

b) All completions between 1/4/2011 and 1/4/2013.

c) Large site (10 or more) windfall – specific sites anticipated to gain planning permission within the plan period.

d) Small site (< 10) windfall – an estimate for the last five years of the plan period based on the average completions per year (113/year) in the 10 year period up to 2011.

e) Dwellings on proposed LDP allocations.

IMAC3 — Paragraph 5.15 — Amend table accompanying paragraph 5.15 as follows:

Settlements	% of all dwellings	% of existing	% of new housing	% of growth	% of all dwellings

<table>
<tr><th>MAC Number</th><th>Section in LDP</th><th>Details of Change</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>2011</td><td>supply*</td><td>allocation</td><td>2011-21</td><td>2021</td></tr>
<tr><td>MAIN TOWNS</td><td><s>42.21</s>
41.84</td><td><s>36.37</s>
36.66</td><td><s>56.44</s>
46.83</td><td><s>44.78</s>
41.68</td><td><s>42.45</s>
41.82</td></tr>
<tr><td>SEVERNSIDE
SETTLEMENTS</td><td><s>21.62</s>
22.10</td><td><s>28.92</s>
25.64</td><td><s>27.02</s>
39.67</td><td><s>28.13</s>
32.56</td><td><s>22.24</s>
23.26</td></tr>
<tr><td>RURAL SECONDARY SETTLEMENTS</td><td><s>7.49</s>
7.27</td><td><s>11.65</s>
14.53</td><td><s>3.60</s>
5.32</td><td><s>8.29</s>
9.99</td><td><s>7.56</s>
7.57</td></tr>
<tr><td>RURAL
GENERAL</td><td><s>28.68</s>
28.78</td><td><s>23.05</s>
23.17</td><td><s>12.91</s>
8.18</td><td><s>18.80</s>
15.78</td><td><s>27.75</s>
27.34</td></tr>
</table>
* The total of columns a) + b) + c) + d) from the table accompanying Policy S2 above.
</td></tr>
<tr><td>MAC15</td><td>Policy S3</td><td>Amend Policy S3 – Strategic Housing Sites, as follows:

Policy S3 – Strategic Housing Sites

The housing needed from new housing allocations as set out in Policy S2 will be largely met on the following strategic sites:

Abergavenny – Deri Farm, Mardy.
Caldicot/Portskewett – Crick Road, Portskewett.
Chepstow – Land at Fairfield Mabey, Chepstow</td></tr>
</table>

MAC Number	Section in LDP	Details of Change
		Monmouth – Land at Wonastow Road, Monmouth. Magor/Undy – Rockfield Farm, Undy. **Magor/Undy – Land at Vinegar Hill, Undy.** **Sudbrook – Former Paper Mill, Sudbrook** Development proposals for these sites will need to comply with the site specific criteria set out in Policies SAH1-SAH~~5~~ **7** and also meet the following requirements: a) Any detailed application for development shall be preceded by, and consistent with, a master plan for the whole site that has been approved by the Council; b) Any detailed application for development shall include a feasibility assessment for suitable renewable energy and low or zero carbon technologies that could be incorporated into the development proposals.
MAC16	Paragraph 5.25	Amend paragraph 5.25 as follows: 5.25 Policy S4 below also provides for reduced threshold levels at which affordable housing will be required. The *Affordable Housing Viability Study* identified (based on an analysis of housing supply for 2006-9) that 40% of the overall supply came from sites of less than 10 dwellings (10% on sites of 5 to 9 dwellings and 30% on sites of 1 to 4 dwellings). Policy S4, therefore, lowers the threshold at which affordable housing will be required to sites of 5 or more dwellings in Main and Secondary settlements and to sites of **3** ~~2~~ or more dwellings in Main and Minor Villages. All dwellings will also be required to make a contribution towards the provision of affordable housing. For the purposes of Policy S4 'development sites' will be taken to include schemes for conversion and sub-division.
MAC 17	Policy S4	Replace Policy S4 with the following: 'Policy S4 – Affordable Housing Provision ~~Provision will be made for 960 affordable homes in the Local Development Plan Period 2011-2021. To meet this need it will be expected (subject to appropriate viability assessment) that:~~

MAC Number	Section in LDP	Details of Change
		~~• Development sites with a capacity for 5 or more dwellings in Main Towns and Rural Secondary Settlements as identified in Policy S1 will make provision for 35% of the total number of dwellings on the site to be affordable.~~ ~~• Development sites with a capacity for 5 or more dwellings in the Severnside settlements identified in Policy S1 will make provision for 25% of the total number of dwellings on the site to be affordable.~~ ~~• Development sites with a capacity for 3 or more dwellings in the Main Villages identified in Policy S1 will make provision for 60% of the total number of dwellings on the site to be affordable.~~ ~~• Development sites with a capacity for 2 dwellings in Main and Minor Villages identified in Policy S1 will make provision for 1 dwelling to be affordable.~~ ~~• Development sites with a capacity for 3 dwellings in or adjoining Minor Villages identified in Policy S1 will make provision for 2 of the total number of dwellings on the site to be affordable~~ ~~• Development sites with a capacity for 4 dwellings in or adjoining Minor Villages identified in Policy S1 will make provision for 3 of the total number of dwellings on the site to be affordable~~ ~~In the open countryside developments involving conversion of existing buildings or sub-division of existing dwellings to provide 3 or more additional dwellings will make provision for 35% of the total number of dwellings to be affordable.~~ Provision will be made for around 960 affordable homes in the Local Development Plan Period 2011-2021. To meet this target it will be expected that: • In Main Towns and Rural Secondary Settlements as identified in Policy S1 development sites with a capacity for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 35% of the total number of dwellings on the site to be affordable. • In the Severnside settlements identified in Policy S1 development sites with a capacity for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 25% of the total number of dwellings on the site to be affordable. • In the Main Villages identified in Policy S1: o Development sites with a capacity for 3 or more dwellings will make provision for at least 60% of the total number of dwellings on the site to be affordable. • In the Minor Villages identified in Policy S1 where there is compliance with Policy H3: o Development sites with a capacity of 4 dwellings will make provision for 3 dwellings to be

MAC Number	Section in LDP	Details of Change
		affordable. o Development sites with a capacity for 3 dwellings will make provision for 2 dwellings to be affordable • In the open countryside developments involving conversion of existing buildings or sub-division of existing dwellings to provide 3 or more additional dwellings will make provision(subject to appropriate viability assessment) for 35% of the total number of dwellings to be affordable. • Development sites with a capacity below the thresholds set out above will make a financial contribution towards the provision of affordable housing in the local planning authority area. Other than in Main Villages, in determining how many affordable houses should be provided on a development site, the figure resulting from applying the proportion required to the total number of dwellings will be rounded to the nearest whole number (where half rounds up). The capacity of a development site will be based on an assumed achievable density of 30 dwellings per hectare.
IMAC4	Paragraphs 5.26 and 5.27	Replace paragraph 5.26 with the following: ~~5.26 The target of 840 affordable homes will largely be met by;~~ ~~35% on new sites in settlements outside the M4 corridor 350~~ ~~25% on new sites in settlements inside the M4 corridor 112~~ ~~60% on rural housing allocations 130~~ ~~20% on identified UHP 102~~ ~~20% on current commitments 59~~ ~~Windfalls 74~~ ~~827~~ 5.26 Potential affordable housing provision if all sites achieve their maximum requirement is as follows: 35% on new sites in Main Towns and Rural Secondary Settlements ***446*** 25% on new sites in Severnside settlements 242 60% on rural housing allocations in Main Villages ~~129~~

MAC Number	Section in LDP	Details of Change
		120 20% on large site windfalls 68 20% on current commitments 108 Completions 2011 – 2013 127 Small site windfalls 74 **Total** ~~***1,194***~~ ***1185*** Amend paragraph 5.27 as follows: ~~This is 133 short of the overall identified level of need.~~ To this supply figure~~, however,~~ can be added some rural exception sites (although the necessity for the latter will be reduced through the allocation of sites for 60% affordable housing in Main Villages) and 100% affordable housing sites that are not delivered through Section 106 agreements. It is also anticipated that some affordable housing need would be met through adjustments in the second hand market. Adopting lower thresholds will also increase the potential for windfall development to contribute to the overall supply of affordable housing. Development sites where the capacities fall below the thresholds set out in Policy S4 will be expected to make a financial contribution towards affordable housing provision, the precise amount required per dwelling to be set out in Supplementary Planning Guidance.
MAC19	Policy S7	Amend Policy S7 as follows: Policy S7 – Infrastructure Provision The infrastructure needed to service and deliver sustainable development must be in place or provided in phase with proposed development. Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided. Where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought. Financial contributions will also be required towards the future management and maintenance of facilities provided, either in the form of initial support or in perpetuity.

MAC Number	Section in LDP	Details of Change
		Planning Obligations may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make development acceptable. In identifying appropriate contributions due regard will be paid to the overall development viability**, including the cost of measures that are necessary to physically deliver a development and ensure that it is acceptable in planning terms**. Such obligations may include: 1. Strategic utilities 2. Community and cultural facilities 3. Formal and informal open space 4. Recreation and leisure facilities 5. Green infrastructure 6. Ecological mitigation 7. Educational facilities 8. Transport infrastructure 9. Sustainable transport measures 10. Waste management facilities 11. Renewable / low carbon energy infrastructure 12. Local climate change mitigation and adaptation measures 13. Flood risk management measures 14. Commuted payments for the management and maintenance of facilities provided 15. Broadband infrastructure 16. Other facilities and services considered necessary. **In the event that viability considerations indicate that not all the identified contributions can be reasonably required, priority contributions will be determined on the basis of individual circumstances of each case. In the case of housing developments, priority will be given to the affordable housing required by Policy S4 unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other necessary purpose/s.** Proposals for utility services to improve infrastructure provision will be permitted, subject to detailed

MAC Number	Section in LDP	Details of Change
		planning considerations.
MAC20	Paragraph 5.55	Amend Paragraph 5.55 as follows: 5.55 The Community Infrastructure Levy (CIL) came into force in April 2010 and will have implications on the range and nature of contributions sought through planning obligations during the plan period~~, particularly~~***. Amended regulations are due to take effect from spring 2014 and*** **after 6 April 2015** ~~***when***~~ **it will not be possible to pool contributions from more than five obligations**. ~~Consequently, the Council will need to reconsider the approach to contributions sought through planning obligations. Any such considerations would be accommodated through the LDP review process or through the preparation of Supplementary Planning Guidance.~~ **It is considered that the LDP Strategic Sites can be delivered without the need for CIL as each site has specific infrastructure requirements that can be dealt with through a standard Section 106 Legal Agreement. The Council, however, resolved on 27 June 2013 to commence preparatory work on CIL with a view to adopting a CIL charge as soon as is practicable following adoption of the LDP. Any such changes would be accommodated through a review of the SPG on Planning Obligations, accompanied by an associated Infrastructure Plan that will set out the Council's priorities for infrastructure provision and form a basis for a CIL charging schedule.**
IMAC5		Update the schedule of infrastructure provision for each strategic site (found at Appendix 3 of EXAM007R-MCC) and publish as Appendix 1 of LDP. Amend Paragraph 5.53 as follows: 5.53 The provision of key infrastructure to support the development of the Strategic Sites outlined in Policy S3 is integral to the implementation of the LDP Strategy. Planning obligations will be sought to deliver the key infrastructure necessary to support the delivery of the strategy. The broad requirements for each site are set out in the Site Allocations Policies. More detail is provided by the schedule at Appendix 1.
MAC21	Paragraph	Paragraph 5.69 is amended as follows:

MAC Number	Section in LDP	Details of Change
	5.69	Policy S9, therefore, seeks to ensure the provision of employment land and premises of an appropriate scale in sustainable locations and to protect existing employment sites. **It is, however, recognised that occasionally employment and wealth generating opportunities can be provided by uses that are not strictly industrial and business development under Class B of the Town and Country Planning (Use Classes) Order 1987, where they assist in enabling land to be brought forward for industrial and business purposes.** Reflecting the need for a range of locations, types and sizes of employment land and premises throughout the County, this policy also seeks to enable the provision of small business premises and mixed-use employment opportunities. As such, Policy S9 helps to meet LDP Objective 7.
MAC22	Policy S9	Amend Policy S9 as follows: Policy S9 – Employment Sites Provision Provision will be made for a suitable range and choice of sites for industrial and business development (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987), as set out in the Site Allocation Policy. This includes: (1) 37 hectares at Magor suitable for employment development of regional or sub regional significance. (2) Around 5-6 hectares at each of the Main Towns of Abergavenny (Llanfoist), Chepstow and Monmouth. (3) The protection of existing employment land and premises that continue to be required for their existing purpose. ~~Other employment and wealth generating opportunities that contribute to sustainable economic growth may be permitted on these sites, particularly where they assist in enabling land to be brought forward for industrial and business development, subject to detailed planning considerations.~~ To ensure that a range of types and sizes of employment land and premises is provided, development proposals for the following will be permitted, subject to detailed planning considerations: • Small units and workshops for small businesses throughout the County to assist in providing regeneration opportunities and enabling sustainable economic growth;

MAC Number	Section in LDP	Details of Change
		• The integration of new employment opportunities in mixed-use developments.
MAC23	Chapter 5	Insert additional paragraph after paragraph 5.74 as follows: **5.75 The provision of a replacement livestock market in Bryngwyn, near Raglan, and the redevelopment of the existing cattle market site in Abergavenny to provide a new supermarket is one such example of a rural enterprise scheme in Monmouthshire. Following the conclusion of the judicial process in relation to this planning permission, the project is moving at pace with the replacement livestock market anticipated for completion by the end of 2013. Once the cattle market has relocated construction of the new supermarket in Abergavenny town centre will commence.**
MAC 24	Paragraph 5.86	Insert additional title before paragraph 5.86 (page 77) as follows: '**Efficient Resource Use and Flood Risk**'
MAC 25	Paragraph 6.2.1	Paragraph 6.2.1 is amended as follows: ~~The Council recognises that sometimes employment and wealth generating opportunities can be provided by uses that are not strictly industrial and business development under Class B of the Town and Country Use Classes Order 1987, particularly where they assist in enabling land to be brought forward for employment purposes. Such circumstances are referred to in Strategic Policy S9.~~ **Reflecting** ~~The~~ the main thrust of Policy S9~~, however, is~~ to protect existing employment land from alternative developments~~.~~**,** Policy E1 below sets out the criteria against which development proposals for the alternative use of existing employment sites /premises will be assessed.
MAC 26	Policy E1	Amend Policy E1 as follows: Policy E1 – Protection of Existing Employment Land ~~Other than in the exceptional circumstances set out in Policy S9,~~ Proposals that will result in the loss of

MAC Number	Section in LDP	Details of Change
		existing or allocated industrial and business sites or premises (classes B1, B2 and B8 of the Town and Country Planning Use class Order 1987) to other uses will be permitted if: a) the site or premises is no longer suitable or well-located for employment use; b) a sufficient quantity and variety of industrial sites or premises is available and can be brought forward to meet the employment needs of the County and the local area; c) there is no viable industrial or business employment use for the site or premises; d) there would be no substantial amenity benefits in allowing alternative forms of development at the site or premises; e) the loss of the site would not be prejudicial to the aim of creating a balanced local economy, especially the provision of manufacturing jobs. Exceptionally, planning permission may be granted for a change of use if existing employment land when the above criteria are not fully complied with if: (i) the proposal is for small scale retail uses which are ancillary to the main business/industrial activity; or (ii) small scale service activities of an industrial nature which are not suited to the high street and involve the sale, service or repair of vehicles or machinery.
IMAC6	Paragraph 6.2.25	Delete ~~(paragraph 4.9.1 refers)~~
MAC 27	Paragraph 6.3	Amend title as follows: '~~SUSTAINABLE DEVELOPMENT~~ **EFFICIENT RESOURCE USE AND FLOOD RISK**'
IMAC7	Paragraphs 6.3.43 - 45	Delete 'Green Belt' heading, paragraphs 6.3.43, 6.3.44 and 6.3.45, and Policy LC6. Delete Green Belt designation on the Proposals Map.
IMAC8	Policy LC7	Add ***e) Chepstow, Pwllmeyric and Mathern.*** Define former Green Belt area (see IMAC7 above) as Green Wedge on the Proposals Map.
MAC 28	Policy MV10	Policy MV10 –Transport Routes and Schemes amended, as follows:

MAC Number	Section in LDP	Details of Change
		The following transport routes and schemes will be safeguarded from development that would be likely to prejudice their implementation: Welsh Government Road Schemes: • M4 corridor enhancement scheme Magor to Castleton (length in Monmouthshire to be safeguarded indicated on Proposals Map)~~-~~….
MAC29	Policy SAH1	Amend criterion c) of Policy SAH1 Deri Farm Abergavenny, as follows: c) No dwelling shall be occupied until after 1 April 201**5**
MAC30	Policy SAH1	Include an additional criterion in Policy SAH1 Deri Farm Abergavenny, as follows: **d) Provision is made in any detailed scheme for a strong landscape buffer along the northern edge of the site in order to minimise the impacts of the development on the landscape character of the adjoining Brecon Beacons National Park**
MAC31	Paragraph 7.3	Amend paragraph 7.3 as follows: This is a Greenfield site (although allocated for employment development in the UDP) that comprises ~~9.6~~ **10.95** hectares and is located on the north-western side of Portskewett, with residential development to the south-east and commercial development to the west. ~~The UDP employment site includes an area of around 1.33 hectares to its western side that is not included within the residential allocation. This is because it has not come forward as a candidate site so that its deliverability cannot be guaranteed. The Village Development Boundary for Portskewett is drawn around this additional area of land, however, and its development for employment or residential purposes would be likely to be acceptable in principle subject to detailed planning considerations. There is potential for providing around 2 hectares of employment land if the Crick Road site is extended to include the adjoining land within the development boundary.~~ The allocated site ~~of 9.6 hectares~~ includes a steeply sloping elevated area on the eastern side of the site that it is considered should not be developed but retained as amenity open space. Also, there is an existing/potential flood storage area for surface water to the south of the site that it is intended to retain as open space. **Allowing for 1 hectare of employment land provides a** ~~The~~ net

MAC Number	Section in LDP	Details of Change
		site area~~, therefore, is~~ **for residential of** ~~7.42~~ **7.77** hectares giving a proposed net density of ~~34~~ **37** dwellings per hectare. The site is located on the Great Spring SPZ1. Any future planning application for the site, therefore, would need to be accompanied by a Preliminary Risk Assessment in relation to any potential impacts on the aquifer.
MAC 32	Policy SAH2	Amend Policy SAH2 as follows: Policy SAH2 – Crick Road, Portskewett ~~9.6~~ **10.95** hectares at the Crick Road, Portskewett, site are allocated for mixed use residential and employment development. a) Around ~~250~~ **285** new dwellings are provided, to be phased over the plan period; b) A Section 106 Agreement has been signed that, in addition to standard requirements, includes ~~provision for making a financial contribution to improving employment infrastructure in the Caldicot/Portskewett area, or in association with adjoining land that is within the Village Development Boundary makes~~ provision for ~~2~~ **1** hectare~~s~~ of serviced land within the site for industrial and business development (Class B1 of the Town and Country (Use Classes) Order); c) A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for any necessary off-site works to improve pedestrian access to and from the site, particularly in relation to the centre of Portskewett and to employment, shopping and community facilities in nearby Caldicot.
MAC33	Paragraph 7.4	Amend paragraph 7.4 as follows: This brownfield site lies to the east of the built-up area of Chepstow, between a railway embankment and the River Wye. It is currently in use for heavy industry but the occupiers wish to re-locate from the site to Newhouse Park on the outskirts of Chepstow where they have recently set up another industrial enterprise. The overall site area is 18.9 hectares but this includes the former Beaufort Quarry, which would not be suitable for development, leaving an overall area of 16.1 hectares. In addition, the River Wye adjacent is a Special Area of Conservation and a Site of Special Scientific Interest and there is a need to provide a 'buffer' area to the riverbank, together with a riverside walkway. The site is also seen as having a potential for mixed-use development to provide some employment opportunities to

MAC Number	Section in LDP	Details of Change
		compensate for the loss of the existing employment site (albeit that the existing employment use is likely to be relocated locally) and help alleviate the shortage of new employment land within Chepstow. This is likely to reduce the net developable area to around 9.5 hectares. At a density of 3~~0~~**7** dwellings per hectare, this would give potential for ~~285~~ **350** dwellings. ~~It is considered, however, that this should be phased to be completed beyond the plan period in order to avoid too fast a rate of growth in Chepstow, given that it has been resolved to grant planning permission subject to a Section 106 Agreement for 169 dwellings at the Osborne International site, which was originally included in 'Lower Chepstow' strategic housing allocation put forward in the LDP Preferred Strategy.~~ A small part of the site, on its eastern edge adjacent to the River Wye, is identified on the TAN15 DAM Maps as being undefended tidal flood plain. The location of site adjacent to Chepstow Railway Station and close to the Town Centre provides opportunities for sustainable transport, walking and cycling.
MAC34	Policy SAH3	Amend criterion a) of Policy SAH3 as follows: Policy SAH3 – Fairfield Mabey, Chepstow a) Around ~~240~~ **350** dwellings are provided during the LDP period
MAC35	Policy SAH3	Amend criterion l) of Policy SAH3 Fairfield Mabey Chepstow, as follows: l) **no highly vulnerable development shall take place in those parts of the site that are within the designated C2 flood zone.** No **other** development shall take place in those parts of the site that are within the designated C2 flood zone unless a flood consequences assessment has been carried out that demonstrates that the consequences of flooding in these areas are acceptable.
IMAC9	Paragraph 7.5	Amend paragraph 7.5 as follows: This is a Greenfield site (although it includes 6.5 hectares allocated for employment development in the UDP) on the western side of Monmouth. The overall site area is ***33.36*** ~~26.9~~ hectares but if an area in the 1 in 1000 year flood plain is excluded together with a SINC and the employment area then this leaves ***16.46*** ~~10~~ hectares for residential development. In employment terms this site is considered to

MAC Number	Section in LDP	Details of Change
		be particularly suited for the provision of green and low carbon technology and knowledge intensive/high technology enterprises as identified in Strategic Policy S8.
IMAC10	Policy SAH4	Amend first paragraph of Policy SAH4 Wonastow Road, Monmouth, as follows: ***33.36*** hectares at the Wonastow Road, Monmouth site are allocated for a mixed use residential and employment development. Planning permission will be granted provided that: ...
IMAC11	Policy SAH4	Amend criterion a) of Policy SAH4 Wonastow Road, Monmouth, as follows: a) Around ***450*** dwellings are provided, to be phased over the LDP period;
MAC36	Policy SAH4	Amend criterion g) of Policy SAH4 Wonastow Road, Monmouth, as follows: g) **no highly vulnerable development shall take place in those parts of the site that are within the designated C2 flood zone.** No **other** development shall take place in those parts of the site that are within the designated C2 flood zone unless a flood consequences assessment has been carried out that demonstrates that the consequences of flooding in these areas are acceptable
MAC37	Paragraph 7.6	Amend paragraph 7.6 as follows: This is a greenfield site comprising 11 hectares on the north-eastern side of Undy. The extent of the site has been limited by a safeguarding area for the M4 Relief Road to the north and amenity open space and a safeguarding route for a Magor/Undy by-pass to the south. There is also a potential SINC within the site, leaving a net residential area at the site of ~~6.2~~ **8**.2 hectares, once the ~~4~~ **2** hectare employment allocation is allowed for.
MAC38	Policy SAH5	Amend Policy SAH5 as follows: Policy SAH5 – Rockfield Farm, Undy 11 hectares at the Rockfield Farm, Undy, site are allocated for a mixed use residential and employment development. Planning permission will be granted provided that:

MAC Number	Section in LDP	Details of Change
		a) No more than ~~200~~ **270** new dwellings are provided during the LDP period; b) **A Section 106 Agreement has been signed that, in addition to standard requirements, includes** ~~P~~ **p**rovision ~~is made~~ within the site for ~~4~~ **2** hectares of **serviced** land for industrial and business development (Class B1 of the Town and Country Planning (Use Classes) Order); c) The master plan for the development takes account of the SINC at the site; d) A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for any necessary off-site highway improvements to the highway network through Magor/Undy; ~~A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for making a financial contribution to improving employment infrastructure in the Magor/Undy area;~~ e) A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for making an enhanced financial contribution to community facilities in the Magor/Undy area; f) It is ensured that safeguarding routes for a potential Magor/Undy by-pass and for a potential M4 Relief Road are not prejudiced by the development.
MAC39	Additional paragraph 7.7 supporting new Policy SAH6 (consequential renumbering of subsequent policies and paragraphs)	Insert additional paragraph 7.7 as follows: This is a Greenfield site comprising two parcels of land on either side of Vinegar Hill, Undy with a total area of 7.81 hectares. The site forms a logical extension to the strategic site allocation at Rockfield Farm (Policy SAH5). While access can be obtained from the east through this strategic site, there is also potential for access to the site from the west through Grange Road and Dancing Hill, which will require improvement, provided that there is no direct access from the development to Vinegar Hill itself. The layout of the site will need to ensure that the provision of the route for the Magor/Undy by-pass is not prejudiced. The extent of the site is limited by the safeguarding area for the M4 Relief Road to the north.
MAC40	Additional Policy SAH6 (consequential renumbering of subsequent policies)	Insert additional strategic site allocation policy as follows: **Policy SAH6 – Land at Vinegar Hill, Undy** **7.81 hectares at the Vinegar Hill, Undy site are allocated for residential development. Planning permission will be granted provided that:**

MAC Number	Section in LDP	Details of Change
		a) Around 225 new dwellings are provided; **b) A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for any necessary off-site highway improvements to the highway network through Magor/Undy;** **c) A Section 106 Agreement has been signed that, in addition to standard requirements, includes provision for making an enhanced financial contribution to community facilities in the Magor/Undy area;** **d) It is ensured that safeguarding routes for a potential Magor/Undy by-pass and for a potential M4 Relief Road are not prejudiced by the development.**
MAC41	Additional supporting paragraph 7.8 to new Policy SAH7 (consequential renumbering of subsequent paragraphs and policies)	Insert additional paragraph 7.8 as follows: This brownfield site comprises part of the former Paper Mill site at Sudbrook. The site allocated for development has an area of 6.6 hectares and is that part of the former Paper Mill that is outside the flood plain. Given that the site is located adjacent to the Severn Estuary SAC and SPA, any application for development at the site will need to be the subject of a project level HRA to ensure that development will not adversely affect the integrity of the SAC and SPA. Additionally, lesser horseshoe and common pipistrelle bats have been recorded using the Paper Mill. These are European Protected Species, protected by The Conservation of Habitats and Species Regulations 2010. Any development at the site, therefore, will also need to ensure there is no detriment to the favourable conservation status of the protected species.
MAC42	Additional Policy SAH7 (consequential renumbering of subsequent policies)	Insert additional site allocation policy as follows: **Policy SAH7 – Former Paper Mill site, Sudbrook** **6.6 hectares at the Former Paper Mill, Sudbrook, are allocated for residential development for around 190 new dwellings.**
MAC43	Policy SAH6 (now Policy SAH8)	Amend Policy SAH6 (now Policy SAH8)Tudor Road Wyesham, as follows: Policy ~~SAH6~~ **SAH8** – Tudor Road, Wyesham

MAC Number	Section in LDP	Details of Change
		2.05 hectares at the Tudor Road, Wyesham, site are allocated for a residential development of around 35 dwellings. Planning permission will be granted provided that: ~~a) Provision is made, as part of the affordable housing requirement for the site, for one dwelling to be a special care facility;~~ **a)** The layout of any proposal makes provision for an appropriate buffer zone between any residential development and the boundary of the Wye Valley Area of Outstanding Natural Beauty and **ensures that no development takes place on the higher slopes of the site or on that part of the site designated as a SINC**.
MAC44	Additional supporting paragraph 7.10 to new policy SAH9 (consequential renumbering of subsequent paragraphs and policies)	Insert additional paragraph 7.10 as follows: This site comprises 1.9 hectares and is located within the existing Abergavenny Town Development Boundary. It is a brownfield site previously used for local authority offices including a registrar's office. There are a number of mature trees on the site that would need to be taken into account in any development proposal.
MAC45	Additional Policy SAH9 (consequential renumbering of subsequent policies)	Insert additional site allocation policy as follows: **Policy SAH9 – Coed Glas, Abergavenny** **1.9 hectares at the Coed Glas, Abergavenny site are allocated for a residential development of around 60 dwellings.**
MAC46	Paragraph 7.8 (now paragraph 7.11)	Amend paragraph 7.8 (now paragraph 7.11) as follows: The rural settlements of Usk**,** ~~and~~ Penperlleni **and Raglan** are relatively sustainable in that they have a reasonably wide range of community facilities and, therefore, are considered suitable for some small scale residential developments. These are allocated under Policy SAH~~7~~ **10** below:

MAC Number	Section in LDP	Details of Change
MAC47	Policy SAH7(ii) (now Policy SAH10(ii))	Amend Policy SAH7(ii) (now Policy SAH10(ii)) as follows: SAH~~7~~**10**(ii) Land to the south of School Lane, Penperlleni, ~~1.34~~ **3** hectares ~~40~~ **65** dwellings**, subject to the net developable area being no more than 2.2 hectares, with the remainder of the site being utilised to provide a landscape / ecological zone**
MAC48	Policy SAH7 (now Policy SAH10)	Amend Policy SAH7 (now policy SAH10) (Rural Secondary Settlements) as follows: **SAH10(iii) Land at Chepstow Road, Raglan, 2.18 hectares 45 dwellings, subject to no highly vulnerable development taking place in those parts of the site that are within the designated C2 flood zone, and no other development taking place in those parts of the site that are within the designated C2 flood zone unless a flood consequences assessment has been carried out that demonstrates that the consequences of flooding in these areas are acceptable.**
MAC49	Paragraph 7.9 (now paragraph 7.12)	Amend Paragraph 7.9 (now paragraph 7.12) as follows: 7.9 The LDP spatial strategy makes provision for small-scale housing allocations in all Main Villages as designated under Strategic Policy S1 except for St. Arvans, where there are issues regarding Minerals Safeguarding Zones around the settlement, and Llandogo. The primary purpose of these allocations is to provide affordable housing to meet the needs of local people and developments will be expected to comply with the requirements of Policy S4, i.e. that 60% of dwellings are affordable. The maximum number of dwellings that will be permitted on any allocated site will be 15 **in order to ensure that any development is of a 'village' scale, in keeping with the character of the settlements.** ~~, although t~~ **T**his amount may be smaller in certain villages, as set out in Policy SAH8 below**, which indicates the scale of development that is considered to be acceptable having regard to the characteristics of the village and the particular site.** ~~and shown on the Proposals Map.~~ **It is unlikely to be acceptable for these lower site capacities to be exceeded unless it can be clearly demonstrated that there is no adverse impact on village form and character and surrounding landscape**. Certain sites have specific requirements that have been identified through the site assessment/consultation process and these are listed below. Generally, development briefs will be prepared for each site setting out the issues that any planning application will need to respond to, including village

MAC Number	Section in LDP	Details of Change
		form, design and materials of existing buildings, landscape, biodiversity and access.
IMAC12	Policy SAH8 (now Policy SAH11)	Amend Policy SAH8 (now Policy SAH11) by deleting the allocation SAH8(vii) Land to the east of Llandogo. The settlement boundary should remain drawn around the site to permit residential development should constraints be removed in the future.
MAC50	Policy SAH8 (now Policy SAH11)	Amend Policy SAH8 (now Policy SAH11) as follows: Policy SAH8 (now Policy SAH11) – Main Villages The following housing allocations are made in the Main Villages as designated in Policy S1. Planning permission will be granted for the residential development of these sites subject to detailed planning considerations. **Except where stated, the maximum number of dwellings that will be permitted on any site will be 15. Where a lower figure is indicated, any increase in capacity above that stated is unlikely to be acceptable unless it can be clearly demonstrated that there is no adverse impact on village form and character and surrounding landscape.** SAH8(i) (a) Land adjacent to village hall, Cross Ash. ~~Maximum~~ **Around** 10 dwellings. SAH8(i)(b) Land adjacent to Cross Ash Garage. ~~Maximum~~ **Around** 5 dwellings. SAH8(ii) Land at Well Lane, Devauden. ~~Maximum 15 dwellings~~. SAH8(iii) Land to south east of Dingestow. ~~Maximum 15 dwellings~~. SAH8(iv) Land to west of Grosmont~~. Maximum 15 dwellings~~, subject to provision of community open space (play area/allotments). SAH8(v) Land to the north of Little Mill. ~~Maximum 15 dwellings.~~ SAH8(vi) Land to rear of village hall, Llanddewi Rhydderch. ~~Maximum~~ **Around** 5 dwellings. ~~SAH8(vii) Land to the east of Llandogo~~. ~~Maximum 15 dwellings~~. SAH8(viii) Land to the north west of Llanellen. ~~Maximum 15 dwellings.~~ SAH8(ix) Land at Ton Road, Llangybi. ~~Maximum~~ **Around** 10 dwellings. SAH8(x)(a) Land to the rear of the Carpenter's Arms, Llanishen. ~~Maximum~~ **Around** 5 dwellings. SAH8(x)(b) Land adjacent Church Road, Llanishen. ~~Maximum~~ **Around** 5 dwellings. SAH8(xi) Land to the north of Llanvair Kilgeddin. ~~Maximum~~ **Around** 5 dwellings. SAH8(xii) Land to west of Mathern~~. Maximum 15 dwellings~~. SAH8(xiii) Land to the south west of Penallt. ~~Maximum~~ **Around** 10 dwellings.

MAC Number	Section in LDP	Details of Change
		SAH8(xiv) Hill Farm, Pwllmeyric. ~~Maximum 15 dwellings.~~ SAH8(xv)(a) Land to east of Shirenewton (south of minor road). ~~Maximum~~ **Around** 5 dwellings. SAH8(xv)(b) Land to east of Shirenewton (north of minor road). ~~Maximum~~ **Around** 5 dwellings. SAH8(xvi) Land adjacent Trellech School~~. Maximum 15 dwellings,~~ subject to vehicular access being from the B4293 only, improved pedestrian facilities to the village and provision of car parking area for the adjoining school. SAH8(xvii) Land adjacent Wern Gifford, Pandy~~. Maximum 15 dwellings~~, subject to **no highly vulnerable development taking place in those parts of the site that are within the designated C2 flood zone,** no **other** development taking place in those parts of the site that are within the designated C2 flood zone unless a flood consequences assessment has been carried out that demonstrates that the consequences of flooding in these areas are acceptable, ~~development avoiding flood plain~~, protection and enhancement of adjoining Scheduled Ancient Monument and provision of community open space (play area/allotments).
MAC 51	Page 193	Amend paragraph 8.4 as follows: The indicators are associated with corresponding targets, **where relevant,** which provide a benchmark for policy implementation. Where appropriate, 'milestone' targets are included in order to determine whether the plan is progressing towards meeting the overall strategy. The Council will investigate any strategic policy that fails to meet its target.'
MAC 52	Page 193	Amend paragraph 8.6 as follows: Source data **and the monitoring method** for each indicator ~~is~~ **are** also provided in the framework. This identifies the sources of information that will be used for consistent data analysis.
MAC 53	Page 193	Insert additional paragraph after paragraph 8.6 Chapter 8 - Monitoring as follows (and renumber subsequent paragraphs accordingly): 'The Council has attempted to avoid risks to the delivery of the LDP by adopting a proactive approach to removing constraints and a thorough assessment process. For example, this approach to the strategic

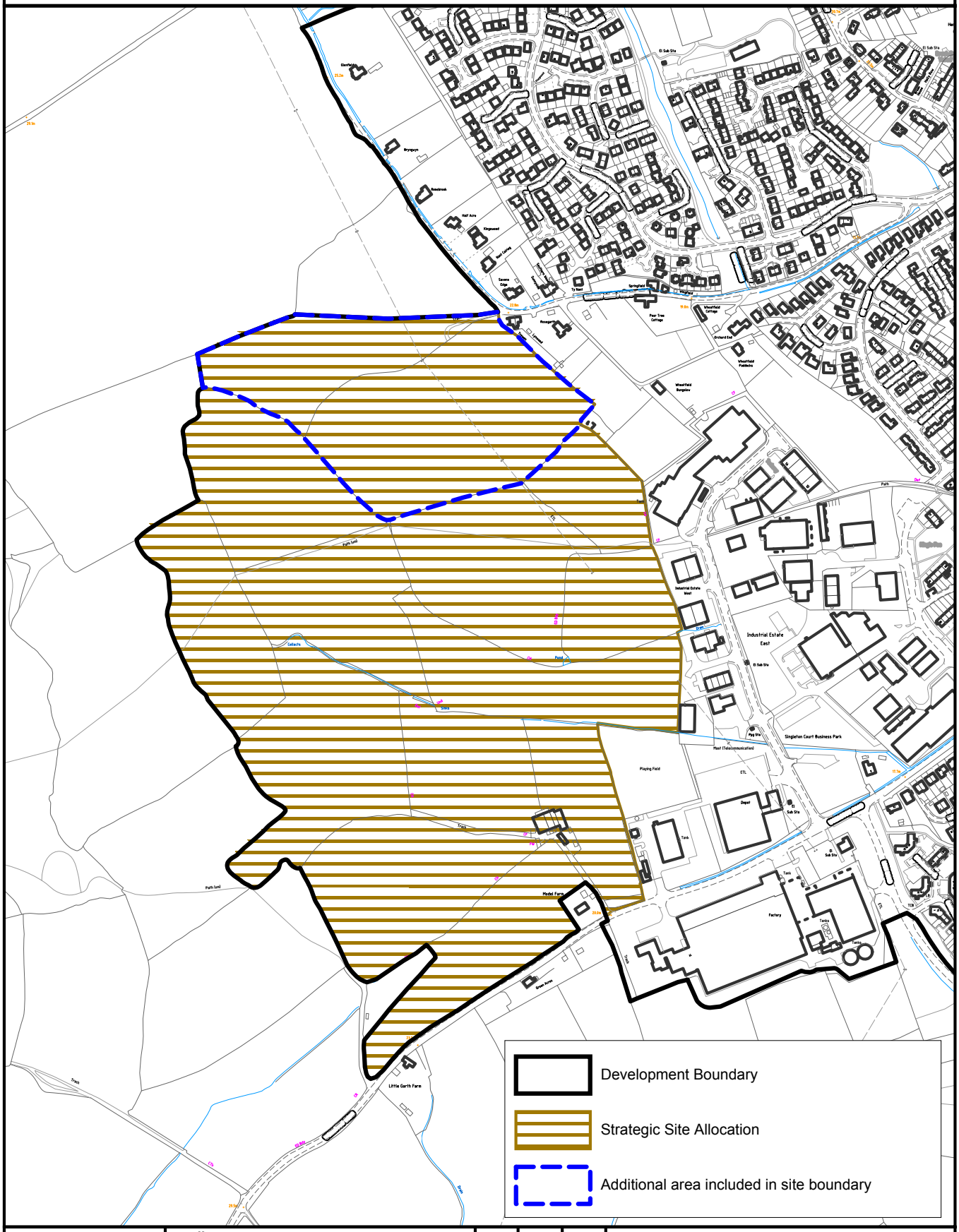
MAC Number	Section in LDP	Details of Change
		sites has ensured that the sites are demonstrably viable and that any constraints to their development can be addressed. Should any issues arise with the deliverability of the strategic sites this will be picked up through 'trigger points' in the monitoring framework and addressed accordingly through the Annual Monitoring Report (AMR).'
MAC 54	Page 193	Insert additional paragraph after new paragraph 8.6 Chapter 8 – Monitoring Framework (and renumber subsequent paragraphs accordingly): 'With specific regard to monitoring design, it is noteworthy that design within the AONB is routinely given a high priority in the development control process, added to which the AONB Officer selects about 10% of applications for particular scrutiny in case design or other aspects will be damaging to the area's natural beauty. Planning Committee takes a close look at AONB applications, and undertakes an annual design tour and review of successes and failures, with AONB examples frequently being featured. As a result, design in the AONB is closely monitored, albeit on an informal basis and this process will be considered in the AMR.'
MAC 55	Page 193/194	Amend paragraph 8.8 (now 8.9) as follows: The information gathered through the monitoring framework and the SA/SEA monitoring framework will be reported in the annual monitoring report (AMR). Local planning authorities are required to produce AMR's following the adoption of LDPs in order to review the plan's progress and to assess the effectiveness of its policies and proposals. The AMR will identify actions that need to be taken to resolve any issues raised through the monitoring process. This could include amendments to policies in order to improve their effectiveness, and in more extreme cases could result in a review of part or of the whole plan. The AMR will report information covering the preceding financial year and will be submitted to the Welsh Government by 31 October each year **and will be available to view on the Council's website.**
MAC56	Chapter 8	Replace the Monitoring Framework tables with those set out in Appendix 5
IMAC13	Proposals Map	Amend Proposals Map as set out in Appendix 6 Proposals Map amended as follows: • Crick Road site (SAH2) amended to 'strategic mixed-use' allocation • Crick Road site (SAH2) amended to include the adjoining land identified in Policy SAH2 for

MAC Number	Section in LDP	Details of Change
		employment use, in the strategic mixed-use allocation • Expand the minerals safeguarding areas to include the safeguarding margins • Include land at Vinegar Hill, Undy (Policy SAH6) as a strategic housing allocation and amend the Magor /Undy Development boundary accordingly (MAC40), delete the DES2 designation. • Include SAH7 as a strategic housing allocation. Delete Sudbrook Paper Mill as a Protected Employment site (MAC42) • Include Coed Glas, Abergavenny (SAH9) as an urban housing allocation (MAC45) • Amend site boundary of Land to south of School Lane Penperlleni (now Policy SAH10(ii)) to take account of the site's increased capacity and amend Penperlleni Development Boundary accordingly.(MAC47) • Include land at Chepstow Road, Raglan (Policy SAH10(iii)) as a rural secondary settlement housing allocation and amend Raglan Development Boundary accordingly. (MAC48) • Delete the allocation at SAH8(vii) Land to the east of Llandogo (IMAC12) • Delete the Green Belt designation and replace with Green Wedge designation. • Wonastow Road allocation amended to include Drewen Farm as an extension to the site.

Appendices:

- **Appendix 1 – updated Chapter 1: Introduction**
- **Appendix 2 – updated Chapter 3: Overview /Profile of Monmouthshire**
- **Appendix 3 – updated Chapter 4: Key Issues, Vision and Objectives**
- **Appendix 4 – updated Key Diagram**
- **Appendix 5 – updated Chapter 8: Monitoring**
- **Appendix 6 – Proposals Map update**
- **Appendix 7 – Schedule of Infrastructure Provision for Strategic Sites**

Appendix B: Inspector's Matters Arising Changes - Proposals Map Update
IMAC13 - Extension of Wonastow Road, Monmouth (Policy SAH4)



	Details Amendment to SAH4		**Rev No.**		
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	Monmouthshire Local Development Plan Inspector's Matters Arising Changes				

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