



Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Submission

Preliminary Questions Statement

October 2025



monmouthshire
sir fynwy

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RLDP Submission - Preliminary Questions Statement

1. Has the LDP been prepared in accordance with the requirements of:

a) The approved Delivery Agreement, including the Community Involvement Scheme?

- 1.1. The RLDP has been prepared in accordance with the Delivery Agreement (DA) including Community Involvement Scheme (CIS). Whilst the initial DA was agreed 19th March 2018, four revisions have been made to it during the Plan preparation process. This included a revision to reflect the delay incurred up to the Preferred Strategy Stage as a result of the pre-election period preceding the December 2019 General Election (March 2020); a revision and update to review the Issues, Vision and Objections and Evidence Base due to the Covid-19 pandemic (October 2020); a revision to reflect revised timescales following the decision to embark on a new Preferred Strategy following a Welsh Government objection and for the Plan to address phosphate water quality issues in the River Wye and River Usk Catchment areas (December 2022); and a revision to reflect the impacts on the publication of the Deposit RLDP (consultation draft) due to the timing of UK General Election (October 2024). Further details can be found in the Deposit RLDP Consultation Report (SD31).

b) The Well-being of Future Generations Act (Wales) (2015)?

- 1.2. The RLDP has had regard to the provisions of the Well-Being of Future Generations Act (WBFGA) 2015. This is set out in the Objectives of the Plan (Table 1 of the RLDP), which have been grouped in alignment with the seven Well-Being Goals and are aligned with the RLDP issues, the main policy themes identified in PPW12, the Gwent PSB Well-being Plan steps and the Council's Community and Corporate Plan. In accordance with the WBFGA, the RLDP seeks to prevent future problems and will, therefore, continue to avoid new development in flood risk areas and will ensure the delivery of net zero carbon homes to help address the climate and nature emergency and tackle issues such as fuel poverty. Consideration of the Well-Being Goals is further imbedded within the Integrated Sustainability Appraisal (ISA) Framework.

c) The Equality Act (2010)?

- 1.3. The RLDP has been prepared in accordance with The Equality Act (2010). The RLDP's Sustainable and Resilient Communities Strategy has a key purpose to tackle inequality in our communities, and this is set out in the key issues the RLDP seeks to address. The RLDP seeks to tackle inequality, specifically by seeking to address house price unaffordability, which currently prevents some of our communities accessing suitable homes within the County. This is likely to benefit younger people, who in turn will make our ageing communities more socially and economically balanced and more sustainable. The provision of affordable homes combined with policy interventions in relation to the requirement of a mix of market housing will increase opportunities for those in poverty to access safe, secure and suitable homes.
- 1.4. Ensuring our communities, including rural communities, are socially and economically sustainable is a key objective of the Plan, with site allocations selected to provide high-quality and accessible places to live and work. Supporting Monmouthshire's economic prosperity also aims to address inequality by providing and protecting a range of employment land opportunities and establishing a supportive planning policy framework to facilitate attracting and retaining investment and development in a range of sectors. Consideration of the Equality Act is also imbedded within the Integrated Sustainability Appraisal (ISA), which incorporates an Equality Impact Assessment (EqIA) as part of the ISA process.

2. Has the LDP been subject to a robust Sustainability Appraisal / Strategic Environmental Assessment? Have all of the ‘likely significant environmental effects’ of the Plan and all ‘reasonable alternatives’ been identified, described and evaluated?

- 2.1. An Integrated Sustainability Appraisal (ISA) is an iterative process and has been undertaken at key stages of the plan preparation process. The integrated ISA (SD28) fulfils the requirements and duties for Sustainability Appraisal and Strategic Environmental Assessment, Equalities Impact Assessment, Health Impact Assessment, Welsh Language Impact Assessment and Well-being of Future Generations. The ISA assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous ISA reporting undertaken to accompany earlier stages of the RLDP including an ISA Scoping Report (December 2018) (SD23), Initial ISA (November 2022) (SD24) and ISA Technical Annex – Candidate Site Assessment (updated September 2025) (SD30).
- 2.2. The likely significant effects of the Deposit Plan, based on reasonable assumptions, have been identified, described and evaluated drawing on the ISA objectives identified through the scoping report as a methodological framework. Cumulative effects are also considered, including the potential for the Plan to impact on an aspect of the baseline data once implemented alongside other plans, programmes, and projects. Explicit reference to cumulative effects is made within the appraisal as appropriate.
- 2.3. In accordance with regulatory requirements, the ISA appraises reasonable alternatives detailing how they have been established and appraising options relating to the level of growth, the location of growth and strategic growth areas.

3. Has the LDP been subject to a robust Habitats Regulations Assessment?

Where ‘likely significant environmental effects’ have been identified, has an adequate Appropriate Assessment (AA) been undertaken?

- 3.1. A Habitats Regulation Assessment (HRA) has been undertaken throughout the course of the preparation of the RLDP as an integrated and iterative process, with the assessment of the Deposit Plan contained in the HRA of the Monmouthshire RLDP Deposit Plan – September 2024 (SD21).
- 3.2. The HRA shows that Likely Significant Effects (LSEs) can be excluded for the identified pathways in relation to most European sites, however, the following pathways required investigation via an appropriate assessment:
- Atmospheric pollution impacts on the Usk Bat Sites SAC, Cwm Clydach Woodlands SAC, Wye Valley Woodlands SAC, Severn Estuary SAC / SPA / Ramsar, River Wye SAC and Avon Gorge Woodlands SAC
 - Recreational pressure in the Severn Estuary SAC / SPA / Ramsar, Usk Bat Sites SAC, River Usk SAC, River Wye SAC, Sugar Loaf Woodlands SAC, and Wye Valley Woodlands SAC.
 - Loss of Functionally Linked Land in relation to the Usk Bat Sites SAC, Wye Valley and Forest of Dean Bat Sites SAC and Severn Estuary SPA / Ramsar
 - Water Quality relating to the River Usk SAC, River Wye SAC and Severn Estuary SAC
 - Water Quantity, Level and Flow relating to the River Usk SAC & River Wye SAC and Severn Estuary SAC
- 3.3. The policies and allocations contained in the Deposit RLDP have been subject to an Appropriate Assessment where LSEs could not be excluded and identified mitigation measures and recommendations incorporated into the Deposit Plan. The Deposit HRA

concluded that subject to the inclusion of the recommendations of the HRA, the Monmouthshire RLDP contains a sufficient policy framework that no adverse effect would arise on habitats sites either alone or in combination with other plans or projects.

- 3.4. Following the consultation on the Deposit Plan and associated HRA, and in response to concerns raised regarding the robustness of the assessment of the potential loss of functionally linked land relating to the Wye Valley and Forest of Dean Bat SAC, an Addendum to the Habitats Regulations Assessment (SD22) has been prepared. This concludes that with regard to the conservation objectives specific to the Wye Valley and Forest of Dean Bat Sites SAC, sufficient foraging habitat is maintained with minimal loss in suitable foraging habitat within the Core Sustenance Zone of designated roosts within the SAC as a result of the proposed site allocations in the Monmouth area.
4. **Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? If there have, what are the implications of these changes for the Plan? Do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? What is the intended timescale for this work?**
 - 4.1. Since the publication of the Deposit RLDP in November 2024, Technical Advice Note (TAN)15: Development, Flooding and Coastal Erosion was published by Welsh Government in March 2025 and sets out the criteria against which the consequences of a development in an area at risk of flooding can be assessed and is accompanied by the Flood Map for Planning (FMfP). TAN15 reflects the core principles of the National Strategy for Flood and Coastal Erosion Risk Management in Wales to adopt a risk-based approach in respect of new development in areas at risk of flooding and coastal erosion. TAN15 comprises technical guidance related to development planning and flood risk and provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. In accordance with the updated TAN15, an updated Stage 1 and Stage 2 Strategic Flood Consequence Assessment (SD100, SD100a, SD100b) has been undertaken and forms part of the RLDP evidence base.
 - 4.2. There have not been any changes of note to local circumstances since the publication of the Deposit Plan.
5. **Is the LDP strategy consistent/compatible/in conformity with:**
 - a) **National policy, guidance and Future Wales: the National Plan 2040?**
 - 5.1. The RLDP is considered to be consistent and compatible with national planning policy and guidance, including Future Wales: The National Plan 2040 and PPW12, as set out in the Soundness Self-Assessment of the Deposit RLDP (SD18). In response to the Deposit RLDP consultation, Welsh Government confirmed that 'the Plan is in general conformity with Policies 1, 7, 33 and 36 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire. Furthermore, the level of economic and housing growth proposed by the Deposit Plan is considered to support the local need for additional economic and affordable housing growth. More generally, the overarching policy framework of the Deposit Plan is considered to align with the policy aims of the Future Wales, with many common policy themes running through both. Examples of this include placemaking (Policy 2), active travel (Policy 12), town centre first (Policy 6) and creating resilient ecological networks and enhancing green infrastructure provision (Policy 9). Particularly relevant in a Monmouthshire context is the policy focus on supporting rural communities (Policy 4) and the rural economy (Policy 5) and delivering

affordable homes (Policy 7) which are key challenges for the County. In this respect the Deposit Plan is considered to set the policy framework for delivering the policy objectives of Future Wales at a local level.

- 5.2. The Deposit Plan has regard to national policies and guidance as set out in PPW12 and associated Technical Advice Notes (TANs). The RLDP and supporting documents refer to relevant sections of PPW12 specific to the issue being discussed and the policy requirements of PPW12 have been considered and incorporated where relevant in the preparation of the RLDP policies and proposals. The supporting text adds further commentary on the links to national guidance. Each of the Strategic Policies is supported by a policy context section which sets out links to the wider policy framework including PPW12 and TANs.

b) The Well-being Goals?

- 5.3. The RLDP has had full regard to the provisions of the Well-Being Goals, as set out in the Well-being of Future Generations (Wales) Act 2015. This is clearly demonstrated in the Plan's Objectives (Table 1 of the RLDP), which have been grouped in alignment with the seven Well-Being Goals, the main policy themes identified in PPW12, the Gwent PSB Well-being Plan and the Council's Community and Corporate Plan. Consideration of the Well-Being Goals is further imbedded within the Integrated Sustainability Appraisal (ISA) Framework.
- 5.4. Each Strategic Policy provides a table setting out its links to the wider policy framework and which of the well-being goals it will contribute to.

c) The Welsh National Marine Plan?

- 5.5. The RLDP covers a number of issues and policy areas which complement the aims and objectives of The Welsh National Marine Plan. In particular, Strategic Policy S3 – Sustainable Place Making and High Quality Design, Policy S4 – Climate Change and Policy S5 – Green Infrastructure, Landscape and Nature Conservation, complement the Marine Plan by directing development away from areas of flood risk, protecting and enhancing green infrastructure and network and recognising the challenge posed by climate change. The relationship with the Marine Plan is enhance further through detailed Development Management policies, such as Policy NR2 – Severn Estuary Recreational Pressure, which seeks to ensure that there are no adverse impact on the integrity of the Severn Estuary SAC, SPA and Ramsar as a result of an increase in visitor pressure and Policy NR3- Protection of Water Sources and the Water Environment, which seeks to ensure development does not impact upon quality and quantity of water sources. As such, the RLDP policy framework seeks to safeguard the river ecosystem, which flows into the Severn Estuary and National Marine Plan area.

d) The Relevant Area Statement?

- 5.6. Monmouthshire forms part of the South East Wales Area Statement along with Blaenau Gwent, Caerphilly, Newport and Torfaen, which was published by NRW in March 2020. The Deposit Plan has regard to the Area Statement's strategic themes of Linking Our Landscape; Climate Ready Gwent; Healthy Active Connected; and Ways of Working and through the Strategic Policies seeks to achieve many of the outcomes associated with each theme. Examples of this include Strategic Policy S5 – Green Infrastructure, Landscape and Nature Conservation which is consistent with many of the outcomes sought from the Area Statement including improved resilience of our ecosystems across Gwent and the need to safeguard and enhance core habitat networks and support ecological connectivity on and between our best sites across Gwent. Similarly, Strategic Policies S3 – Sustainable Placemaking and High Quality Design and S4 – Climate Change, are consistent in their aims as many of the outcomes associated with Climate Ready Gwent and Healthy Active Connected. Consequently, the

Deposit Plan is considered to be consistent with the key themes and aims of the South East Wales Area Statement.

- 5.7. Of note, NRW, in response to the Deposit Plan consultation, replied noting that it considers the Deposit Plan has had regard to the South East Wales Area Statement through the policy framework and can see the synergies between them, particularly on climate change, landscape and nature recovery, and active travel.

e) If an LDP, the relevant strategic development plan (when adopted)?

- 5.8. The preparation of an SDP is in its early stages, with no clear policy framework established at this time. However, Monmouthshire County Council has been actively involved in the discussions and agreements put in place to date, and the Council has formally resolved to be part of the SDP.

f) Regional plans/strategies and the programmes of utility providers?

- 5.9. Monmouthshire is a border county in a strategic location, benefitting from its involvement in regional economic partnerships including the Cardiff Capital Region City Deal, The Western Gateway and Marches Forward. The Deposit Plan has been prepared within the context of the relevant regional plans and strategies, with Appendix 3 of the Plan, associated background papers and the supporting commentary of the strategic and detailed policies providing details of the documents that have been considered.
- 5.10. The Integrated Sustainability Assessment and Habitats Regulations Assessment also consider the in-combination effects of the Plan along with other plans and strategies in the region and conclude that the Plan is in line with both regional and local environmental protection objectives.
- 5.11. Utility companies have been involved throughout the preparation of the RLDP to ensure consistency with their programmes. For example, extensive discussions and consultation have taken place between the Council and Dŵr Cymru Welsh Water to ensure there is foul sewerage drainage capacity and identify solutions to the phosphates constraint affecting the County, as well as other utility companies such as Western Power, to understand capacity for growth and for renewable energy.

g) The plans/strategies of neighbouring local planning authorities?

- 5.12. The Deposit Plan considers cross-border issues and the plans of neighbouring authorities, as relevant, and reflects the discussions and agreements reached relating to cross-border issues. Examples include agreement on the approach to the housing numbers attributed to growth in the Bannau Brycheiniog National Park Authority area, consideration of Newport's capacity to accommodate an element of Monmouthshire's growth on previously developed land, consideration of Torfaen's strategic site allocations and discussion with the Forest of Dean regarding their issues and objectives and growth strategy with particular reference to infrastructure impact on Chepstow. Discussions have also taken place with neighbouring English authorities as part of the Duty to Cooperate process in England including with regard to the potential for Monmouthshire to accommodate additional growth from these authorities.

h) The relevant Well-being Plan or National Park Management Plan?

- 5.13. The Plan has regard to the provisions of the Gwent Public Service Board (PSB) Well-being Plan. The Well-Being Plan contains two main objectives; to create a fairer, more equitable and inclusive Gwent for all and a climate-ready Gwent, where our environment is valued and protected, benefitting our well-being now and for future generations. The Well-Being Plan then identifies five steps that will help to achieve the two well-being objectives. The RLDP

objectives as shown in Table 1 of the RLDP, set out the Gwent PSB Well-being steps that are considered to correspond with the RLDP objectives to illustrate where the two align and how the RLDP will help deliver on the Gwent PSB Well-being Plan. The Plan's Strategic Policies also set out which of the Well-being Plan objectives it has a particular link to.

- 5.14. The area of the Bannau Brycheiniog National Park (BBNP) that sits within MCC's administrative area is excluded from the extent of the RLDP's geographical area and does not form part of Monmouthshire's Planning Authority remit. The relationship and impact of the BBNP does, however, remain a significant consideration for the preparation of the RLDP. The RLDP is considered to reflect the aims of Dyfodol Y Bannau: The Future Management Plan for the BBNP (2023-2028) and its five inter-connected missions relating to Climate, Water, Nature, People and Place. Many of the RLDP's policies seek to deliver the same outcomes as Dyfodol Y Bannau.

6. Has the LPA exhausted all opportunities for joint working and collaboration on both the preparation of the LDP and its evidence base?

- 6.1. As discussed in response to question 5(g), the Deposit Plan considers cross-border issues and the plans of neighbouring authorities, as relevant, and reflects the discussions and agreements reached relating to cross-border issues.
- 6.2. In recognition of the value of working with neighbouring authorities, and in response to PPW12 and the Development Plans Manual (Ed 3, March 2020) emphasis on collaborative working, the preparation of the Deposit Plan has involved a regional and coordinated approach to the collection of evidence, with a significant amount of the evidence base commissioned on a joint basis with Blaenau Gwent and Torfaen and on a wider regional basis with other local authorities in south east Wales. Examples include the regional assessment of future growth and migration for the Cardiff Capital Region (CCR), a Larger than Local Employment Study, Population and Household Projections, Integrated Sustainability Appraisal, Habitats Regulation Assessment, Development Viability Model, Renewable Energy Assessment and Strategic Flood Consequence Assessment. This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis, as well as at a local level.
- 6.3. We have held regular joint meetings to ensure there is a consistency of approach. Further details of joint working and collaboration are referenced throughout the RLDP in relation to specific topic areas. On-going regional meetings and collaboration are pursued through the longstanding South-East Wales Strategic Planning Group (SEWSPG), the Planning Officers South Wales (POSW) and the South-East Wales Planning Officer Society (SEWPOS). Work undertaken by SEWSPG and topic-based Pathfinder groups, have helped establish a common approach to a number of Plan preparation tasks including candidate sites assessments, sustainable settlement appraisals and retail and employment land monitoring. Long standing regional working methods associated with areas such as waste and minerals are continued and are reflected in the Deposit Plan.
- 6.4. Regard will continue to be had to the emphasis on regional working in light of future provisions around the preparation of Strategic Development Plans.

7. What is the LDP's spatial strategy? How do the key components of the strategy interact? Does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

- 7.1. Strategic Policy S2 – Spatial Distribution of Development, sets out a clear spatial strategy that is considered to reflect a key objective of the RLDP, to deliver sustainable and resilient communities for all. The RLDP spatial strategy focuses new development in the primary settlements of Abergavenny (including Llanfoist), Chepstow, Monmouth and Caldicot including the Severnside area. A lower level of growth is proposed in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the RLDP, with the majority of both directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area).
- 7.2. The Plan's Growth and Spatial Strategy as set out in Strategic Policies S1 and S2 propose a level and distribution of growth that has regard to locally specific issues and constraints, whilst also ensuring that the RLDP delivers on our objectives and addresses our core issues of delivering affordable homes, responding to the climate and nature emergency by delivering net zero carbon homes and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic, and supporting and enabling sustainable economic growth.
- 7.3. The distribution of growth has been informed by a series of Growth and Spatial Option Papers, which measure the performance of the options against the RLDP objectives and ISA themes, and the outcome of the consultation undertaken on the Preferred Strategy (2022), mostly notably Welsh Government's response advising that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements to address phosphates at the Monmouth Wastewater Treatment Works. In this respect, the spatial strategy responds to challenges and the changing situation associated with water quality issues affecting the River Usk and River Wye catchments. It also responds to other development constraints such as environmental designations and has regard to Policy 34 of Future Wales and the indicative Green Belt Boundary. Overall, it is considered that the spatial strategy strikes a compromise between achieving our local evidence-based objectives that underpin the Deposit Plan, whilst having regard to the built and natural environment and feedback from earlier Plan stages.

8. How was the LDP's settlement hierarchy defined? Is the methodology used to define the hierarchy clear and rational?

- 8.1. The Spatial Strategy set out in Strategic Policy S2 seeks to distribute growth through a settlement hierarchy derived from the Sustainable Settlement Appraisal (SSA) (SD160). The SSA groups settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The appraisal sets out the methodology used to assess the sustainability of each settlement, based on three primary principles – Transport Services/Accessibility, Community Services and Facilities and Employment Opportunity. It also sets out settlement profiles for each settlement including a range of social and economic data along with the services and facilities available. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, which is reflected in the spatial strategy.
- 8.2. The methodology used for the SSA is based on the approach set out in the South-East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal (SSA) Paper, with some amendments for local considerations. The methodology reflects the requirements of the Development Plans Manual and provides a basis for regional consistency and is, therefore, considered to be a clear and rational basis for the RLDP settlement hierarchy. In

accordance with Planning Policy Wales (PPW), the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for new development, including housing and employment provision. The criteria used for identifying clusters is set out in sections 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary) Settlement. The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot, referred to as Severnside. Other clusters include Abergavenny and Llanfoist, and Monmouth and Wyesham. This approach is consistent with the methodology and PPW.

9. What is the rationale for the distribution of new development? Is the approach consistent with the National Sustainable Placemaking Outcomes?

- 9.1. The rationale behind the spatial distribution of growth is underpinned by the RLDP Vision and Objectives and the settlement hierarchy. Combined, these provide a clear focus of the Plan's purpose. The RLDP's objectives have emerged from an understanding of the challenges and the needs of Monmouthshire, as well as a sound, logical and robust evidence base. Focussing growth in the County's most sustainable primary settlements, along with a lesser amount to the County's most sustainable rural settlements, is deemed the most appropriate, sustainable means to deliver the RLDP Vision and Objectives as justified within the RLDP Growth and Spatial Options Paper (SD4) and subsequent amends (i.e. to allow for growth in Monmouth). The Plan will maximise affordable housing delivery throughout the County, to a net zero standard, delivering on two key Council commitments. The broad alignment of housing and employment growth will support sustainable economic growth.
- 9.2. The overarching spatial strategy and RLDP policy framework is considered to align with the National Sustainable Placemaking Outcomes set out in PPW, with corresponding policy objectives considered as part of the site selection process and incorporated throughout the Deposit Plan. Reference is drawn to the Self-Assessment of the Deposit Plan (SD18) and the assessment of conformity with Future Wales, which demonstrates that the RLDP is in general conformity and supports the delivery of the Future Wales policies including its strategic placemaking principles. The RLDP policy framework seeks to ensure development contributes to the creation of sustainable places that focus on delivering placemaking and ensuring Monmouthshire's communities are sustainable in the long term and are attractive places to live, work and visit.
- 9.3. The policy framework set out in the Deposit Plan is considered to reflect the policy objectives of the National Sustainable Placemaking Outcomes and Future Wales policy and provide the basis to make a significant contribution to placemaking objectives at the local level within Monmouthshire. The Strategy identifies four Strategic Development Sites which will deliver sustainable and well-connected urban extensions. The sites will have good walking and cycling links to the respective town centres, public transport links and railway stations in relation to three of the sites. Input from the Design Commission for Wales has also helped shape the progression of the Strategic sites and identify key placemaking parameters. In addition, a range of other housing sites are allocated throughout the County in our most sustainable settlements as identified by the Sustainable Settlement Appraisal.
- 9.4. Consistent with its position as a charter signatory to the Placemaking Wales Charter developed by Welsh Government and the Design Commission for Wales in collaboration with the Placemaking Wales Partnership, the Council seeks to ensure that placemaking principles are a key consideration in the delivery of the Plan. Reflecting this, Strategic Policy S3 –

Sustainable Placemaking and High Quality Design, sets out the strategic objectives for all development to create sustainable places to live, work and relax. Building on these requirements, Strategic Policy S8 – Site Allocation Placemaking Principles, establishes key placemaking principles that are required to be incorporated into the residential allocations that will deliver the spatial strategy. In addition, each residential allocation has specific placemaking requirements set out in site specific policies. The National Sustainable Placemaking Outcomes are reflected throughout these policy requirements.

10. What was the methodology underlying the site selection process?

- 10.1. As part of the RLDP preparation process, the Council invited landowners, developers and the public to put forward 'Candidate Sites' to be considered for development, redevelopment or protection in the Monmouthshire RLDP. This was undertaken via a two-stage Call for Candidate Sites in accordance with the South East Wales Strategic Planning Group (SEWSPG) methodology (SD177) (Stage 1 of the candidate sites process). The initial call for candidate sites took place over a sixteen-week period from 30th July to 19th November 2018. The second call for candidate sites took place between 5th July and 31st August 2021, the purpose of which was to invite the submission of new sites for potential inclusion in the RLDP that accord with the Preferred Strategy (together with supporting information), and to seek the submission of additional supporting information for existing candidate sites submitted during the initial call. Sites that were not resubmitted following the initial call for candidate sites no longer formed part of the candidate site process. All sites submitted at the second call for candidate sites and Preferred Strategy consultation stages have been published in a Candidate Site Register (SD166 – SD176). Consultation on the Candidate Site Register ran alongside the Preferred Strategy consultation between 5th December 2022 and 30th January 2023.
- 10.2. Stage 2 of the candidate sites assessment process involved a High Level Assessment of Candidate Sites (SD178) which included a desk-based assessment of all submitted sites, identifying and discarding sites that did not meet the initial filtering assessment criteria of: compatibility with the RLDP Preferred Strategy, site size, fundamental constraints and submission of site viability evidence. Sites that did not meet any of the above criteria were filtered out and not considered further in the RLDP process.
- 10.3. Stage 3 of the candidate sites assessment process involved the detailed assessment of sites, comprising two stages. Stage 3A involved an officer level detailed assessment using a 'traffic light' coding system, incorporation of comments from internal departments of the Council and an assessment against the Council's ISA/SEA Framework. Stage 3B involved external consultation with statutory agencies including Dŵr Cymru Welsh Water (DCWW) and Natural Resources Wales (NRW). Following completion of stages 3A and 3B, some sites were not considered suitable as a potential allocation in the RLDP and were sifted out of the process and given no further consideration in the process. Subsequent to this, a list of sites was identified for inclusion in the Deposit Plan for a range of uses including residential and employment. Further details, and the findings of the candidate site assessment process are set out in the Candidate Sites Assessment Report (SD179).

Are the resultant allocated sites:

- a) **In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations?**

- 10.4. The spatial strategy and identification of suitable sites for allocation in the RLDP reflect the site search sequence outlined in national planning policy. The housing and mixed-use allocations identified in the RLDP and are located in accordance with the Settlement Hierarchy set out in Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the County’s primary settlements and most sustainable lower tier settlements. In determining the allocation of sites for development, consideration has been given to such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, affordable housing need, environmental constraints and infrastructure capacity.
- 10.5. The allocated sites have been assessed through the candidate sites assessment process as noted above and none have fundamental constraints that would prevent their development. The Candidate Sites Assessment Methodology (SD177) sets out the methodology and assessment process which includes consideration of land ownership, location, infrastructure requirements, accessibility, environmental impact (including ecological, flooding and pollution), heritage and landscape impact. Consultation and dialogue with external and internal stakeholders have also been undertaken throughout the RLDP process in relation to candidate sites and has continued in relation to allocated sites as the Plan has progressed. Where any specific requirements are considered necessary in relation to allocated sites these are noted in the site-specific policies. The outcome of the candidate sites assessment process is set out in the Candidate Sites Assessment Report (SD179).
- b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?**
- 10.6. The sites are considered to be attractive to the market with housebuilders, land promoters and registered social landlords having been engaged throughout the RLDP process on the promotion of the allocated housing/mixed-use sites.
- 10.7. An Infrastructure Delivery Plan (IDP) has been prepared and identifies site specific infrastructure requirements, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP is included within Appendix 8 of the RLDP and the Infrastructure Delivery Plan Background Paper (SD104) which provides additional information relating to existing infrastructure provision and capacity, covering a range of topic areas.
- 10.8. The proposed site allocations have been subject to detailed viability and deliverability assessments as part of the plan preparation process. Site promoters of the allocated residential and mixed-use sites have completed site specific financial viability assessments (FVA) to support their proposals which demonstrate that their sites are viable based on key policy requirements set out within the site allocation policies, including the provision of 50% affordable homes and net zero carbon homes, without subsidy. The FVAs include costs relating to the requirements set out in the IDP for individual sites. The FVAs were undertaken using a consistent model known as the Development Viability Model (DVM) and independently reviewed by Burrows-Hutchinson Ltd viability consultants. The high-level findings of this review are set out in the Preliminary Viability Report (SD86).
- 10.9. The delivery rates of the allocated sites are set out in the Housing Trajectory in Appendix 9 of the RLDP, which is the key mechanism to demonstrate how sites will be delivered in the identified timescales throughout the Plan period to meet the RLDP housing requirement. A fundamental part of the requirement to frontload the RLDP process is to ensure that the Plan as a whole is deliverable, including site allocations. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020), the site allocations are supported

by a comprehensive suite of technical work (available as part of the RLDP submission documents) to assist in frontloading the process and inform delivery of the site allocations within the Plan. There has been a continuing dialogue with the site promoters along with internal and external consultees during the preparation of the RLDP, which will significantly reduce the time taken to determine planning applications on the sites.

11. Will the LDP be supported by supplementary planning guidance? If so, what subjects will be addressed? What are the timescales for the adoption of the guidance? How will it assist in the delivery of the Plan?

- 11.1. The RLDP will be supported by Supplementary Planning Guidance (SPG) to cover a range of policy areas as set out in Appendix 11 of the RLDP. Indicative timescales for preparation and adoption are noted as being within 12 months of adoption of the Plan. The SPGs will be prepared to provide further detail on certain policies and proposals and to support the interpretation and implementation of the Plan's policy framework.

12. What is the LDP's strategy for the provision of housing? Is it appropriate to meet the needs of the area over the Plan period?

- 12.1. Strategic Policies S1 – Growth Strategy and S2 – Spatial Distribution of Development, set out the overarching strategy to housing provision to meet Monmouthshire's core objective of building sustainable and resilient communities for all. These establish a housing provision figure of 6,210 homes to be focussed on the County's most sustainable settlements, consistent with the settlement hierarchy set out in Strategic Policy S2. On a strategic level, the RLDP's housing growth level seeks to strike a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk, both of which have been addressed. In response to the Deposit RLDP consultation, Welsh Government formally responded with a 'green' rating noting that the Plan is considered to be in general conformity with Future Wales, noting that the level of growth proposed is justified by the need to significantly increase the supply of affordable housing whilst not diverting growth away from the national growth area or having adverse effects on phosphate pollution.
- 12.2. The Deposit Plan is, therefore, considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.
- 12.3. As referenced above, the delivery of affordable homes to specifically address housing affordability which is one of the most fundamental challenges facing Monmouthshire's communities, is a key objective of the Plan. To deliver on this objective and maximise affordable housing delivery, the residential site allocations identified in the Deposit Plan have an affordable housing requirement of 50% affordable homes.
- 12.4. The Plan allocates 18 residential/mixed-use sites, all requiring the delivery of 50% affordable homes and built to a net zero carbon standard. The Deposit Plan sets out a strategic and site-specific placemaking principles that aim to ensure the sites allocations will help create

sustainable housing developments that provide well-connected and balanced communities that are also respectful of Monmouthshire's natural and historical environment.

13. What is the LDP's housing requirement figure (HRF)? How has it been calculated?

- 13.1. The RLDP's housing requirement figure is 5,400 homes for the period 2018-2033. As stated in Strategic Policy S1 – Growth Strategy, a 15% flexibility allowance has been applied to the requirement figure, with the Plan making provision for 6,210 homes.
- 13.2. The RLDP Growth Strategy adopts a 'policy-on' approach based on a demographic-led scenario with added policy assumptions for the Local Planning Authority area (i.e. excludes the BBNP area within Monmouthshire) using Office for National Statistics (ONS) 2020 mid-year estimate (MYE) base and applying assumptions in relation to migration, household membership rates and commuting ratio. Further details are set out in the Growth and Spatial Options Paper (SD4) and the Edge Analytics Report- Updating the RLDP Demographic Evidence (SD158).

14. In defining the HRF, was adequate regard paid to the latest household and population projections? Was consideration given to the main local influences on housing demand in the area (including household formation rates, migration levels, and household conversion ratios etc)?

- 14.1. Reflecting the work undertaken by Edge Analytics and set out in the Updating the RLDP Demographic Evidence Report (SD158), the housing requirement figure is based on a POPGROUP (PG) Long Term scenario using the Office for National Statistics 2020 MYE base year, with area-specific fertility and mortality assumptions derived from the Welsh Government 2018-based Principal projection. Internal in-migration rates have been adjusted to include higher in-migration from Bristol and South Gloucestershire in the period following the removal of the Severn Bridge tolls (based on the previous 5-years). All other migration flows assumptions are derived from a 19-year historical period (2001/02–2019/20).
- 14.2. Household and dwelling growth is estimated using assumptions from the Welsh Government 2018-based household projection model. An additional household membership rate return (MR) has been applied to the demographic scenarios, considering the impact of higher household formation in the young adult age-groups. The household membership rates for the young adult age-groups (19–24, 25–29, 30–34) have been 'returned' to their respective 2001 level over the 2018–2033 plan period. In modelling the relationship between households and dwellings, a vacancy rate of 4.5% has been applied, derived from 2011 Census statistics for Monmouthshire. A commuting ratio sensitivity has also been applied, reducing it from its 2011 Census value (1.12) to 1.10 by the end of the Plan period.
- 14.3. It is recognised that the ONS released the 2024 mid-year population estimates in July 2025, which estimates that Monmouthshire has a population of 94,930. This compares to the 2020 mid-year figure of approximately 95,000 used as the starting point for the demographic modelling which forms the basis of the RLDP growth strategy.

15. Were alternative housing growth scenarios considered? If so, what alternative scenarios were they, why were they discounted, and why was the preferred option selected?

- 15.1. A number of growth options were considered and consulted upon over the course of the plan preparation to reach the Deposit stage, with details set out in the Deposit RLDP Consultation Report (SD31). However, consideration of the growth options that formed the basis of the

Deposit Plan are derived from Edge Analytics Report- Updating the RLDP Demographic Evidence (SD158).

- 15.2. Edge Analytics used POPGROUP technology to configure a range of growth scenarios for Monmouthshire, incorporating demographic statistics from both the Office for National Statistics (ONS) and Welsh Government, to produce forecasts for a 2018–2033 plan period. POPGROUP (PG) trend scenarios consider growth outcomes based on a continuation of long-term migration histories (PG Long Term), incorporating a 2020 base year. Alternative PG Long Term scenarios are presented in the report, evaluating the potential effects of higher net in-migration associated with the relaxation of Severn Bridge tolls and household formation assumptions (PG Long Term Adj).
- 15.3. A range of dwelling-led scenarios are also considered, with a 2020 base year, setting out how a continuation of a 5-year, 10-year, and 15-year history of housing completion rates would impact upon future population growth in Monmouthshire. An alternative dwelling-led scenario is also presented, evaluating the potential impact of +4,275 total additional dwellings as noted in the Welsh Government response to the 2021 Preferred Strategy. An extended range of employment-led scenarios are also configured. The updated employment-led scenarios use a 2020 base year and incorporate the latest fertility and mortality assumptions from the WG 2018-based 'Principal' projection. The scenarios model the population, household, and dwelling growth outcomes of the employment growth forecasts, and consider a reduction in the net out-commute.
- 15.4. Under each scenario, population, household, migration, dwelling and employment growth is presented over a 2018–2033 plan period, in line with Monmouthshire's RLDP period.
- 15.5. This work formed the basis of the Growth and Spatial Options Paper (SD4), whereby a detailed options appraisal was undertaken in relation to three growth options, chosen with regard to a number of challenges that arose and impacted on the progression of the RLDP. In summary, these involved a Welsh Government objection to the level of growth proposed in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk catchment areas. The Growth and Spatial Options Paper (SD4), sets out the demographic, dwelling and jobs growth levels associated with each option, together with the benefits and risks, including in relation to the ability of each option to meet our objectives and address our key issues, an assessment against the Integrated Sustainability Assessment themes and the impact on plan preparation and deliverability of the RLDP.
- 15.6. The options appraisal concluded that Option 2 – Demographic-led Strategy, was the most appropriate option for progressing the RLDP. While this option reduced the level of growth proposed compared to the 2021 Preferred Strategy, it was considered to be the best option to respond to the challenges outlined in paragraph 15.5, notably the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy. It provides a level of growth that maximises the extent to which the Plan addresses Monmouthshire's local evidence-based issues and objectives, including delivering much needed affordable housing and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic, while also being in conformity with Future Wales and not impacting on the growth levels of the National Growth Areas.

16. What is the LDP's housing land supply figure and how has it been calculated?

- 16.1. The RLDP makes provision for 6,210 homes based on the housing requirement figure of 5,400 homes and the addition of a 15% flexibility allowance equating to an additional 810 homes.

Details of the housing supply components are summarised in Appendix 7 of the RLDP, with further details set out in the Housing Background Paper (SD103).

- 16.2. A 15% flexibility allowance ensures the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues. This will allow for the Plan and associated housing trajectory to be resilient and sufficiently flexible to deal with unforeseen challenges, whilst still enabling the housing requirement to be delivered.
- 16.3. The flexibility allowance is considered to be justified to increase provision to ensure that the strategic sites allocated under HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, are sufficiently large to deliver the required infrastructure, whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need.

17. Is the housing trajectory set out in the LDP realistic?

- 17.1. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates can be achieved to ensure the delivery of the Anticipated Annual Build Rate (AABR) throughout the Plan period. The trajectory and forecast completions have been prepared with regard to the considerable dialogue and engagement that has already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base, available as part of the RLDP submission documents, has been submitted in relation to the proposed site allocations to reduce the risk of a slower delivery rate than anticipated.
- 17.2. Input from a Housing Stakeholder Group has also been considered as part its preparation, with a record of the meeting attached at Appendix 2 of the Housing Background Paper (SD103). An important consideration in the preparation of the trajectory is the 50% affordable homes requirement. Monmouthshire County Council is the first council in Wales to require this level of affordable housing provision, so it is quite unique in terms of the delivery trends that are likely.

18. What is the LDP's strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?

- 18.1. Affordable housing provision is a key issue for the County and forms an integral part of the overarching Strategy with 50% provision required on all new site allocations and sites of 20 homes and over within settlement boundaries (as identified in Tiers 1 – 3 of Policy S2).
- 18.2. The Deposit RLDP has been informed by the Local Housing Market Assessment Refresh 2022-2037 (LHMA) (May 2024) (SD85). The LHMA estimates a net need of 453 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027), with a further 82 affordable homes per year for the remaining ten year period. The majority of the estimated affordable housing need relates to social rent accommodation (370 per year), with low cost home ownership (41 per year) and intermediate rent (42 per year) accounting for the remainder. This would

represent an affordable housing requirement of 3,085 homes if extrapolated over the Plan period. This is not a realistic affordable housing target for the Plan and it is not expected to be as new development is only one of a variety of means of achieving a supply of affordable homes.

- 18.3. The LHMA identifies the greatest social rent need is for one-bed homes. Although this need is particularly high, it is important to ensure that a mix of house types and tenures is provided on new developments in order to achieve balanced communities. The mix and tenures of homes will be agreed with the Council at the planning application stage. The Council use the following definitions of affordable housing: social rented housing, intermediate housing and low cost home ownership. The Council operates a neutral tenure policy to allow for flexibility to enable the tenure type to be set according to current need. Specialist affordable housing will also be sought where a need is identified. The delivery option preferred by Monmouthshire County Council will be set out in the Affordable Housing SPG.
- 18.4. The RLDP will deliver approximately 1,595-2000 affordable homes over the Plan period. The new site allocations will provide on-site provision of 50% affordable housing, with land being allocated for approximately 758 – 1,165 new affordable homes.

19. What is the LDP's affordable housing target? How was it calculated? Does it maximise the opportunities for delivery?

- 19.1. The RLDP affordable housing target is 1,595- 2000 homes. The sources of affordable housing are set out in the Housing Background Paper (SD103) as follows:
 - 521 Completions (affordable homes secured on completions delivered between 2018-2025)
 - 269 Existing commitments (affordable homes secured on existing commitments based on the current Adopted LDP affordable housing percentage thresholds)
 - 118 Allowances (sites of 5-9 homes are calculated on a 40% basis and windfall sites of 10 homes or more are calculated on a 40% or 50% threshold depending on the size of the site identified in the Housing Potential Study consistent with the affordable housing policy set out in the Deposit Plan. There are no affordable homes factored in for small sites of 1-4 homes.).
 - 758 – 1,165 RLDP Housing Allocations (affordable homes to be sought on new housing allocations at a rate of 50%. The range takes account of the 15% flexibility allowance that is built into the housing figures).
- 19.2. The affordable housing figure arising from the different housing supply components forms the basis of the affordable housing target set out in Strategic Policy S7 – Affordable Housing. Following the update of the data following the 2024/25 housing monitoring period, the figures set out in paragraph 19.1, are marginally different to the target included in Policy S7, and it is therefore not considered necessary to amend the policy target at this time.
- 19.3. The RLDP seeks to maximise affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites to help tackle Monmouthshire's housing need, homelessness and social inequality. Monmouthshire County Council is the first council in Wales to require this level of affordable housing provision. The RLDP enables the Council to consider alternative mechanisms for delivering affordable homes and all opportunities to increase the supply of affordable housing will be considered.

20. Will the LDP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? If not, how will this need be met over the Plan period?

- 20.1. The LHMA target would represent an affordable housing requirement of 3,085 homes if extrapolated over the Plan period. As noted in paragraph 18.2, this is not a realistic affordable housing target for the Plan and it is not expected to be as new development is only one of a variety of means of achieving a supply of affordable homes. The RLDP does not include specific requirements for social rented and intermediate accommodation as the Council operates a neutral tenure policy to allow for flexibility to enable the tenure type to be set according to current need. However, it is recognised that the greatest need relates to social rented homes. In relation to the allocated housing sites specifically, the site-specific financial viability assessments have used a consistent approach of 70% social rent and 30% low cost home ownership at a discount of 40% of full market value.
- 20.2. In addition to new development, the Council is exploring and implementing a range of other interventions to increase the supply of affordable housing. These include:
- Repurposing existing buildings – this involves opportunities such as bringing empty homes back into use, utilising faith-owned or community land and buildings and converting commercial properties.
 - Acquisitions – Monmouthshire County Council and partner Registered Social Landlords (RSLs) are acquiring existing properties and refurbishing them for use as affordable housing.
 - Community-led and co-operative housing – the Council is actively engaging with key stakeholders to explore the viability of this approach.

21. How have the LDP's site-specific affordable housing target(s) been defined? In which geographical locations will the target(s) apply?

- 21.1. Strategic Policy S7- Affordable Housing, provides detail of the thresholds at which affordable housing will be required. A Preliminary Viability Report (SD86) has been undertaken to inform the affordable housing targets, which demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing thresholds set out in Policy S7 reflect the outcomes of this work. Financial contributions will be required for sites that fall beneath the thresholds set out in Strategic Policy S7. Further details of such contributions are set out in paragraph 13.1.12 of the RLDP.
- 21.2. As noted above, the RLDP seeks to maximise affordable housing delivery on new housing allocations, setting a 50% affordable housing requirement to help tackle Monmouthshire's affordable housing need. Details of the associated affordable housing numbers for each allocation are set out in Policies HA1 – HA18 – Residential Allocations.

22. How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence?

- 22.1. A Preliminary Viability Report (SD86) has been undertaken to inform the affordable housing targets, which demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing thresholds set out in Strategic Policy S7 reflect the outcomes of this work.

- 22.2. The RLDP also includes a policy for small 100% affordable housing sites adjoining existing settlements, which would not otherwise be allocated for housing (Policy H9). Development thresholds are provided which are considered acceptable in each of the settlement hierarchy tiers.

23. How will off-site contributions be used to deliver affordable housing?

- 23.1. Financial contributions will be required for sites of 1 to 4 homes, conversions and sub-divisions. Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details to be set out in Affordable Housing Supplementary Planning Guidance.
- 23.2. Off-site financial contributions will support the delivery of affordable housing, including options such as social rent, intermediate housing and temporary accommodation. These homes will be made available to individuals and families who are unable to access market housing.
- 23.3. The Council, either directly or in partnership with Registered Social Landlord (RSL) partners, may allocate funds in the following ways:
- New construction: Purchasing land or directly funding the development of new affordable homes.
 - Acquisition of existing properties: Buying market homes and converting them into affordable housing.
 - Building conversions: Repurposing existing buildings for affordable housing use.
 - Bringing empty homes back into use: Renovating vacant properties to provide additional affordable housing stock.

24. What is the LDP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met?

- 24.1. The Plan's strategy for the provision of Gypsy and Traveller accommodation is through a combination of a site-specific allocation for seven pitches and a criteria-based policy to allow the consideration of additional sites that may come forward during the Plan period.
- 24.2. The Council's most recent Gypsy and Traveller Accommodation Assessment (GTAA) (SD101) was completed in 2021 and was agreed by Welsh Government in June 2024. In summary, the conclusions are a need for 13 pitches for families already living within Monmouthshire. This need is broken down as follows:
- An unmet need of nine pitches under the assessment period 2020 to 2025.
 - Beyond 2025, a further unmet need of four pitches over the remaining length of the RLDP (2026 – 2033) to accommodate family growth as children become adults and require their own pitch, giving a total need of thirteen pitches until the end of the Plan period.
 - There is no need for an allocation for travelling show people or circus people.
 - The GTAA did not identify a need to provide a transit site and given the cross-border movement associated with families passing through Local Authorities, this topic is best addressed via the regional Strategic Development Plan.
- 24.3. The DPM notes that the Plan should be clear if the situation has changed since the GTAA was published. Of the thirteen pitches needed, two pitches have been granted planning

permission for a family that was part of the GTAA. This reduced the pitch requirement to eleven. The Planning Committee approval associated with planning application DM/2024/00355 relating to four pitches at Llancayo, further reduces the overall pitch requirement to seven.

- 24.4. Strategic Policy S9 – Gypsy and Travellers, allocates land at Bradbury Farm, Crick for seven pitches to meet the unmet need. Details of the site selection process are set out in the Gypsy and Traveller Background Paper (SD102).

25. What is the LDP's strategy for employment? Has it been informed by an employment land review? Is it consistent with the requirements of national policy? And has it had regard to the key drivers for change in the employment market?

- 25.1. Supporting sustainable economic growth is a key objective of the Plan, with the RLDP's overarching growth strategy seeking to address the issues currently impacting on economic growth, including a shrinking work age population and high levels of out commuting. The proposed level and spatial distribution of growth aims to provide a balance of housing and employment growth, focussing development in the County's primary settlements which have a range of facilities and services.
- 25.2. Reflecting the Growth Strategy, the jobs figure is based on a demographic-led scenario, which includes an adjustment to allow for higher in-migration from Bristol and South Gloucestershire (based on experience over the preceding five years) and a reduction in net out-commuting. The associated employment figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period. The projected increase in the working age population and the linked dwelling requirement underpinning the growth strategy will provide scope for residents to live and work in the area, supporting up to 416 jobs per annum. The Employment Land Review (2022) confirms that the job figure is driven by policy interventions intended to support housing and employment growth to achieve an outcome which exceeds a continuation of trends.
- 25.3. The proposed level of growth aims to provide a balance of housing and employment growth, as required by national planning policy. This alignment means that economic growth will not be undermined by inadequate housing or be reliant on unjustified levels of in-commuting. Similarly, the level of housing will not give rise to high levels of out-commuting. Supporting this level of growth will reduce the need to travel and travel to work distances, which will assist in addressing our challenges in relation to the climate and nature emergency and contribute towards a more balanced demographic profile in Monmouthshire.
- 25.4. In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the County and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) (SD90), which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This includes a supportive policy framework to facilitate economic growth in a range of sectors, as many jobs will be delivered through foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire's economy. This reflects the character of the wider economy of South-East Wales and should be supported in line with the 'whole economy' approach that is advocated by national planning policy.

- 25.5. The provision of employment land is also a key mechanism for achieving the Council's economic growth ambitions. An Employment Land Review (ELR) (Nov 2022) (SD92) was undertaken as evidence to inform the level of land required and the sites to allocate. The ELR was prepared by BE Group and follows Welsh Government guidance in how Local Authorities should approach employment land reviews set out in 'Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan'. In accordance with Welsh Government guidance, the ELR methodology includes a property market assessment including an analysis of demand in terms of specific market sectors, property requirements and geographical areas. An audit of employment sites has also been undertaken including existing, allocated and potential sites. Consideration has also been given to future land requirements through two forecast methods, the first based past building completions and the second on labour demand forecasts.
- 25.6. The Regional Employment Study (Larger Than Local Study) (SD96), which covers the south-east Wales area of Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen sits alongside the ELR and provides a regional scale analysis of the economic evidence base and the property and employment land market.
- 25.7. Employment land monitoring is also undertaken on an annual basis, with the results set in the Employment Land Background Paper (SD91).

26. Does the LDP allocate land for new employment development? If so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?

- 26.1. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given approximately 24ha is allocated over three sites in Magor and Undy, of which 14ha is on allocation EA1f – Quay Point, Magor accounting for a significant proportion of the allocations. The approach taken is, therefore, considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.
- 26.2. Approximately 9ha of the employment land provision is from land take-up between the period 2018-2025 and the remaining 48ha is from new employment allocations. The RLDP identifies 13 employment allocations throughout the County, ranging in size from 0.5ha to 14ha, and covering a range of B Use Classes.
- 26.3. The identification of the employment allocations has been informed by the Employment Land Review (Nov 2022) (SD92), which undertook an assessment of the Adopted LDP sites, and candidate submissions put forward for employment or mixed-use for their appropriateness for and deliverability of employment uses. The findings of the Candidate Site Assessments also informed the process including the consideration of development constraints and compatibility with the RLDP's overarching strategy and vision and objectives. Details of each candidate site assessment are reflected in the Candidate Sites Assessment Report (SD179). Overall, opportunities for economic growth are directed to the County's most sustainable locations, with broad alignment between the proposed level of housing and employment land set out in the RLDP, with the majority of both directed to the primary settlements whilst also recognising the strong links the south of the county has with the M4. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north

towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.

27. Will the LDP provide protection for existing employment sites? If so, what protection will be afforded, and how have the sites been selected?

- 27.1. The provision of a suitable range and choice of sites for industrial and business development in the County also involves the protection of existing employment sites from alternative development. Policy EA2 – Protected Employment Sites, protects 25 existing employment sites for industrial and business development (Use Classes B1, B2 and B8), with Policy E1 – Protection of Existing Employment Land, setting out the criteria against which development proposals for the alternative use of existing employment sites/premises will be assessed.
- 27.2. The identification of the protected existing employment sites has been informed by the Employment Land Review (SD92), which reviews the existing employment areas in Monmouthshire for their on-going appropriateness for employment uses, having regard to factors such as condition of premises, vacancy rates, market attractiveness and location. The assessment methodology has also been used by the Council to assess the protection of a few new additions to the policy. The views of the Council's Employment, Economy and Skills Team have also been considered in the appropriateness of the existing employment sites to safeguard.

28. What is the LDP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period?

- 28.1. The need to sustain and enhance the County's towns and local centres as vibrant and attractive centres, serving the needs of their population and those of their surrounding hinterlands, is a key objective of the RLDP. Strategic Policy S14 – Town, Local and Neighbourhood Centres, sets out the retail hierarchy with Town Centres identified for Abergavenny, Caldicot, Chepstow and Monmouth. Usk and Magor are identified as Minor County Town Centres and, Raglan and Bulwark are identified as Local Centres. A number of Neighbourhood Centres are also identified in Abergavenny, Caldicot, Chepstow and Monmouth. As a result, the retail hierarchy reflects the RLDP growth strategy with the primary settlements being at the top of the retail hierarchy.
- 28.2. A Monmouthshire Town Centre and Retail Study (SD150) has been prepared which informed the retail and commercial centres policy framework and provides further detail on the role and function of the County's centres. The Study considers the retail expenditure capacity associated with individual centres, factoring in the RLDP proposed growth levels and does not identify the need for any additional retail floorspace over the Plan period. The study recognises that there is growth in service uses that provide further opportunities to maintain and enhance the vitality, attractiveness and viability of the centres.
- 28.3. Central Shopping and Commercial Areas (CSCAs) are designated for Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk in Policy RC1 – Central Shopping and Commercial Areas. The aim of Policy RC1 is to encourage a diversity of uses within the County's CSCAs. Primary Shopping Frontages (Policy RC2) are also designated in Abergavenny, Caldicot, Chepstow and Monmouth to cover those areas of the County's main town centres where Use Class A1 retail uses predominate. The RLDP includes a town centre first approach, with a focus of new retail and commercial development in the County's designated CSCA's. The policy approach also supports sustainability objectives focusing such facilities in accessible locations in accordance with the Sustainable Transport Hierarchy.

29. What is the LDP's strategy/policy framework for the following areas:

a) Welsh language

- 29.1. Monmouthshire has a relatively low proportion of population that speak, read and write Welsh (6.6% in 2021) compared with other local authorities in Wales, and the Welsh average (13.8% in 2021). Furthermore, Monmouthshire does not currently have any areas with a notable concentration of Welsh speakers. Subsequently, it is not considered necessary for the RLDP to contain a specific policy to address the Welsh language. The Council will, however, seek to ensure the protection and enhancement of Monmouthshire's cultural heritage which will be promoted through the RLDP. National planning policy provides advice regarding the consideration of the Welsh language in development and will be considered in the determination of planning applications, where appropriate.
- 29.2. The Monmouthshire Welsh Education Strategic Plan (WESP) provides detail on the promotion of greater opportunities for children, residents of all ages and the workforce to learn and speak Welsh. Monmouthshire has Welsh medium primary schools in Abergavenny, Caldicot and Monmouth (Monmouth is using a seedling school model from September 2024). The RLDP supports the aims of the WESP and will support steps taken within proposals to safeguard and grow the use of the Welsh language. Strategic Policy S6 relating to infrastructure includes consideration of and appropriate provision of facilities to support the Welsh Language.

b) Air quality

- 29.3. Air quality in Monmouthshire generally meets current standards, although there are two Air Quality Management Areas (AQMAs) within the County, at Bridge Street in Usk and Hardwick Hill/Mount Pleasant in Chepstow. Policy PM2 – Environmental Amenity, establishes the policy framework to assess the impact of development proposals on air quality. Where it is considered that a development proposal may impact upon an AQMA, or exacerbate an existing problem, developers will be required to provide an assessment of air quality impact, together with proposals for mitigation.
- 29.4. At a more strategic level, the RLDP seeks to minimise any polluting effects that might arise from new development in the County by ensuring development is sustainably located and well-connected to amenities, to encourage a modal shift in travel patterns. It also requires the provision of ultra-low electric vehicle charging infrastructure on every new home in accordance with Policy NZ1 – Monmouthshire Net Zero Carbon Homes policy requirements.
- 29.5. The potential impact of the RLDP on air quality and the effectiveness of the policy framework in addressing the issue has also been assessed via the ISA (SD28) and HRA (SD21). Within the HRA, atmospheric pollution is identified as an 'impact pathway' linked to the RLDP, highlighting the European sites that are sensitive to atmospheric pollution, the policies that could (prior to the consideration of mitigation) result in Likely Significant Effects (LSE) on European sites and establishing recommendations for inclusion in the Plan. Similarly, air quality is also considered within the ISA, forming part of the 'Natural Resources' ISA theme against which policies and proposals have been assessed against.

c) Biodiversity and ecological networks

- 29.6. Monmouthshire has significant and distinctive green infrastructure (GI), landscape, biodiversity and nature resources, a number of which are of international and national importance, as well as numerous locally designated sites. The need to protect, enhance and manage these resources are key objectives of the RLDP, with Section 10 – Green

Infrastructure, Landscape and Nature, of the Plan providing a robust and comprehensive policy framework.

- 29.7. Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery, seeks to ensure that development proposals adopt a proactive placemaking approach set out in national policy, Area Statements and the Wales Nature Recovery Action Plan and that all those participating in the planning process follow evidence based Green Infrastructure Assessments and the step wise approach outlined in PPW and the Environment (Wales) Act 2016 in order to deliver green infrastructure and landscape benefits and assist in nature recovery and ecosystem resilience. Collectively, development management policies GI1 – Green Infrastructure, GI2 – Trees, Woodland and Hedgerows, LC1 – Landscape Character, LC2 – Blaenavon Industrial Landscape World Heritage Site, LC3 – Bannau Brycheiniog National Park, LC4 – Wye Valley National Landscape (AONB), LC5 – Dark Skies and Lighting, NR1 – Nature Recovery and Geodiversity, NR2 – Severn Estuary Recreational Pressure, NR3 – Protection of Water Sources and the Water Environment and PROW1 – Public Rights of Way, provide the Council's positive policy framework towards biodiversity and ecological networks.
- 29.8. In addition, the RLDP is supported by and complements an extensive evidence base relating the biodiversity and ecological considerations, including the Council's Climate and Nature Emergency Strategy (SD206) and the Green Infrastructure Strategy (SD139 and SD140).
- 29.9. The RLDP residential allocation policies (HA1 – HA18) also establish site-specific policy requirements relating to green infrastructure, landscape and nature recovery considerations to ensure these are considered as an integral part of the site's masterplanning from the outset.

d) The historic environment

- 29.10. Monmouthshire has a rich built heritage and historic environment which includes 31 Conservation Areas, 48 Historic Parks and Gardens, 3 Landscapes of Outstanding Historic Interest, approximately 164 Scheduled Ancient Monuments (SAMs) and 2,145 Listed Buildings. There is a need to protect, promote and enhance the best of our historic environments which are an important part of Monmouthshire's culture making it a unique and attractive place to live. The RLDP recognises that the historic environment also plays a key role in sustainable tourism and economic growth.
- 29.11. As a result of the significant number of Conservation Areas in Monmouthshire the RLDP includes specific policies relating to Conservation Areas (Policy HE1) and Design of Shop Fronts in Conservation Areas (HE2) which include detailed criteria for assessing development proposals in Conservation Areas. Conservation Area Appraisals must also be considered along with Chapter 6 of PPW12 relating to Conserving and Enhancing the Historic Environment.
- 29.12. A specific Policy is included in relation to the Roman Town of Caerwent (Policy HE3) which seeks to preserve the special and unique character of the Roman Town of Caerwent, in order to ensure that the remains of the town are left undisturbed and that its special character and openness is preserved.

e) Minerals

- 29.13. In accordance with national and regional policy requirements, the RLDP encourages a sustainable approach to minerals planning. Strategic Policy S16 – Sustainable Minerals Management, establishes the overarching policy approach to minerals management, addressing safeguarding of resources, land-bank requirements and the efficient use of mineral resources. Three further detailed policies provide the policy approach to specific

areas, including Policy M1- Local Building and Walling Stone, Policy M2 – Minerals Safeguarding Areas and Policy M3- Mineral Site Buffer Zones.

- 29.14. In accordance with national guidance and following correspondence with Welsh Government officials, the RLDP Proposals Map safeguards Category 1 minerals reserves identified on the British Geological Survey (BGS) Aggregate Safeguarding Map for South-East Wales. Policy M2 of the RLDP sets out the criteria that development within a Minerals Safeguarded Area will be assessed against.
- 29.15. The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties – Second Review (RTS2) (NRPG41/42) and clarification letter (NRPG43), set out the contribution that each constituent local authority should make towards meeting the regional mineral requirements. At a local authority level, when compared against the apportioned requirement set out in the RTS2, Monmouthshire has a surplus of provision and therefore the RTS2 does not require Monmouthshire to make allocations within the RLDP.
- 29.16. On a regional basis, Monmouthshire forms part of the Former Gwent sub-region along with Torfaen, Newport and Blaenau Gwent. Within the sub-region there is an overall shortfall of reserves. Apportionment details for each Minerals Planning Authority (MPA) are set out in the Minerals Background Paper (SD137). The RTS2 introduces a new requirement for all Local Planning Authorities (LPAs) to agree Statements of Sub-Regional Collaboration (SSRC) in respect of its contribution to the future provision of land won primary aggregates.
- 29.17. The LPAs that make up the Former Gwent Sub-Region have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC), however, it was not possible at the Deposit Plan consultation stage to confirm how the regional apportionment figures will be met due to specific ongoing circumstances that are referenced in the SSRC Position Statement (Appendix 1 of the SD137), such as the outcome of planning applications and candidate site submissions in the sub-region. These influence the sub-region's ability to establish what the shortfall is, making it premature to approach other authorities. The preparation of a Position Statement, to be monitored and updated as circumstances change, was therefore seen as a pragmatic way forward. This approach has been supported by Welsh Government in its representations on the Deposit RLDP. The SSRC: Position Statement has, however, been updated to reflect updates since the Deposit RLDP consultation and is included in the Minerals Background Paper as an appendix (SD137).

f) Waste management

- 29.18. The waste policies set out in the RLDP have been written to accord with national planning policy set out in Planning Policy Wales (PPW) and Technical Advice Note (TAN) 21: Waste. Strategic Policy S17 – Sustainable Waste Management, sets out the overarching policy principles required to facilitate the delivery of sustainable waste management. These include accordance with the waste hierarchy, supporting an integrated and adequate network of waste management infrastructure, the identification of potentially suitable sites, support for the circular economy and ensuring provision of adequate waste management measures in new developments.
- 29.19. PPW and TAN 21: Waste, establish regional monitoring arrangements to inform the preparation of LDPs and assist in the determination of planning applications. The 2018-2019 South East Wales Waste Monitoring Report (published 2020) concludes that there is currently no need for additional landfill capacity within the South-East Wales region and no specific need for such waste management facilities has currently been identified at a regional level.
- 29.20. At a local level, Monmouthshire has a number of partnerships in place to deal with its municipal waste, details of which are set out in the Waste Management section of the RLDP.

- 29.21. In accordance with PPW, the Deposit Plan identifies those employment allocations and existing waste management waste disposal or management sites that are considered suitable in principle for new facilities. Technical Advice Note 21: Waste, states that due to advances in technology and the introduction of new legislation, policies and practices, many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact. For this reason, many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. Having regard to this guidance, the RLDP identifies in Policy W3 – Identified Potential Waste Management Sites, those employment allocations and existing waste disposal/management sites that are considered suitable in principle for new facilities. The RLDP does, however, note that any proposals would have to satisfy a detailed assessment of any environmental and highway impacts in accordance with RLDP policies.
- 29.22. Annex C of TAN 21: Waste sets out the specific planning considerations that need to be considered in assessing planning applications for new waste management facilities. In addition, Policy W1 – Waste Management Facilities, sets out the RLDP criteria for consideration in the determination of waste management proposals.

g) Renewable and low carbon energy

- 29.23. Responding to the climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. Strategic Policy S4 – Climate Change, builds on a number of actions from the Council's Climate and Nature Emergency Strategy (SD206) and draws together specific sustainability issues in relation to energy use and generation, efficient resource use and flood risk and provides a framework for sustainable growth which seeks to enable development that both mitigates the causes of climate change and is able to adapt to its likely effects.
- 29.24. The Council recognise that a step change in local policy is needed if we are to effectively address national ambitions/objectives to reduce carbon emissions from our homes and is reflected in Policy NZ1 – Monmouthshire Net Zero Carbon Homes, which sets out the standards new residential development will be required to build to in Monmouthshire. The policy approach set out in NZ1 requires higher standards for all new residential development to meet the Welsh Government and the Council's carbon emission objectives and is, therefore, considered appropriate in Monmouthshire and in accordance with national and local policy ambitions.
- 29.25. With respect to renewable and low carbon energy generation, consistent with the methodology set out in the Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, the Council commissioned the Carbon Trust to undertake a Renewable and Low Carbon Energy Assessment (RLCEA) (SD145-148).
- 29.26. The RLCEA undertook a high-level constraints assessment of the County to identify areas that could be considered as potential Local Search Areas for wind or ground mounted solar PV development. It concluded that there is limited potential for wind development and that solar power had the greatest potential for contributing to renewable energy provision in the County. However, this resource reduces significantly when Best and Most Versatile Agricultural Land is excluded, with the remaining 'less constrained' areas being sparse, distinct land parcels distributed throughout the County rather than broad areas. Therefore, given the prevalence of high-quality agricultural land in the County, the RLDP does not allocate Local Search Areas for either wind or solar resources. Proposals for renewable energy generation schemes of less than 10MW will be considered on a case-by-case basis having

regard to national planning policy and the requirements of criteria-based policy CC3 – Renewable Energy Generation, and other relevant policies of the Plan.

- 29.27. The Renewable and Low Carbon Energy Assessment (RLCEA) also considers the contribution that Monmouthshire County Council is potentially able to make towards the national energy targets. A range of potential renewable energy sources were considered as part of the RLCEA. However, due to factors such as a relatively small resource, infrastructure restrictions or long-term contracts in place for dealing with waste, the RLDP only sets targets for ground mounted solar, onshore wind, rooftop solar PV and heat pumps. Renewable energy sources that do not have targets are encouraged and open to consideration as part of the planning application process and will be noted as part of the monitoring process.
- 29.28. The RLDP sets out the targets for ground mounted solar and onshore wind. These are resource-based targets consistent with national planning policy. A low and more ambitious target has been prepared reflecting competing land uses and other constraints such as landscape impact, grid capacity and high-quality agricultural land. Targets are also set for roof mounted solar generation and the installation of heat pumps, which align with the RLDP growth levels and the Council's commitment to deliver net zero homes in relation to new allocations.
- 29.29. Full details of the evidence base to the renewable energy and low carbon energy policy approach are set out in the Renewable Energy Background Paper (SD149).
- 29.30. In addition to the above policy framework, Policy CC2 – Renewable Energy Allocation, of the Deposit Plan identifies approximately 16ha of Land at Raglan Enterprise Park, as having potential for a ground mounted solar development, subject to detailed planning considerations. This provides an opportunity to contribute to local and national renewable energy targets as well as potentially providing direct-access energy source to the adjoining existing and proposed employment uses.

h) Transport

- 29.31. Strategic Policy S13 – Sustainable Transport, sets out the requirements for development proposals to be in accordance with the Sustainable Transport Hierarchy, which places an emphasis on development to be located and designed in a way which ensures the reduction in the need to travel and a shift away from the private car for travel. This policy aim is reflected throughout the RLDP policy framework including Strategic Policy S3 – Sustainable Placemaking and High-Quality Design and Strategic Policy S4 – Climate Change, which both advocate the co-location of uses, to minimise the overall need to travel and maximise opportunities for sustainable travel and is reflected in the proposed site allocations, where possible. The provision and incorporation of active travel links in the Plan's residential allocations are also identified in the site-specific policy requirements set out in Policies HA1 – HA18.
- 29.32. The Plan also establishes the highway hierarchy for the purposes of assessing development proposals and supports and safeguards transport schemes identified in the Local Transport Strategy (SD162).

i) Planning obligations.

- 29.33. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. New development will, therefore, be required to provide or contribute towards the provision of necessary infrastructure and satisfy the requirements of Strategic Policy S6 – Infrastructure, which will be delivered/implemented through the Development Management

process and secured via agreements entered into under Section 106 of the Town and Country Planning Act 1990.

- 29.34. An Infrastructure Delivery Plan has been prepared to accompany the RLDP (Appendix 8 of the RLDP and the Infrastructure Delivery Plan Background Paper (SD104)). This identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.

30. Does the LDP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?

- 30.1. A Monitoring Framework has been developed and included within the RLDP, which will be used to assess whether the Plan's strategy, policies and proposals are being delivered. The Monitoring Framework comprises a series of indicators, targets and triggers for further action in relation to each strategic policy and will form the basis for assessing the effectiveness of the strategic policy themes. It also indicates the linkages between the Plan themes, objectives and strategic policies. The indicators have been developed in accordance with Welsh Government guidance on monitoring and include the key indicators set out in the Development Plans Manual. In addition, numerous local indicators have been identified which will further assist in assessing the effectiveness of the strategic policies.
- 30.2. In addition, Section 10 of the ISA (SD28) identifies the indicators that will be used to monitor progress of sustainability issues and more specifically sustainable development. The Monitoring Framework and the ISA monitoring indicators will form the basis for the Annual Monitoring Report (AMR).