



**Monmouthshire Replacement  
Local Development Plan**  
2018-2033

RLDP Deposit  
Representations Register

**Volume 12 - Private Individual**



monmouthshire  
sir fynwy

**Private Individual**

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3708 Mair Liddell  
3709 Mr Iain Ormrod  
3710 Mr MA Huxtable  
3711 Mark Morris  
3712 Miss J  
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3735 Ms Jane Westwood  
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3739 Mrs Heather Burns  
3740 Mrs Helen Carey  
3741 Miss Helen Moody  
3742 Mrs Janet Turner

3743 Mrs Jennifer Richards  
3744 Mrs Jennifer Schofield  
3745 Mrs Jenny Carpenter

**3693**

**John Goulding**

**From:** [REDACTED]  
**Mail received time:** Sat, 14 Dec 2024 10:27:31  
**Sent:** Sat, 14 Dec 2024 10:27:25  
**To:** [MCC - PlanningPolicy](#)  
**Subject:** RLDP Consultation Response Site HA4  
**Importance:** Normal  
**Sensitivity:** None  
**Archived:** 10 February 2025 11:44:31

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I write to express my deep concerns at the proposal to build 270 houses on the farmland at the end of my garden behind [REDACTED]

You will by now be only too familiar with the many reasons why that plan should not go ahead although I cannot find any meaningful responses to the many objections.

How will the possible extra 400 cars, 500 or so children, 500 or so doctors' patients and all the extra requirements for clean and waste water be dealt with?

[REDACTED]

**3694**

**John Martin**

**Archived:** 06 February 2025 13:43:01

**From:** [REDACTED]

**Mail received time:** Sun, 15 Dec 2024 22:46:29

**Sent:** Sun, 15 Dec 2024 22:46:15

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

**Cc:** [REDACTED]

**Subject:** Objection to plan for 270 houses at Dixon, Monmouth

**Importance:** Normal

**Sensitivity:** None

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Dear Sir/Madam,

I live in the Buckholt district of Monmouth, and wish to object to the RLDP for 270 Houses on Fields off Dixon Road in Monmouth. I would like to propose Wonastow Road (CS0274) as the preferred area for this development. My objections are below.:

My main worry is for the bat population. This proposed development equals to 20 football fields and would affect the bats, but this would not be the case if the development is at Wonastow, as this is outside the bats' area.

The Dixon site is just too close to an AONB and historical sites, and would also mean the loss of prime agricultural land. There are also flooding issues illustrated in drainage problems, the closure of the Old Dixon Road and Osbaston because of serious flooding issues. Monmouth Leisure Centre and the Driving Test Centre have had to shut down due to flooding. This has led to emergency services such as the Fire Service and Natural Resources Wales having to pump water away from the surrounding area.

And there would be higher levels of river pollution. The River Wye is Monmouth's water source and has already had two warnings from the Drinking Water Inspectorate, and surface run-off would increase the pollution of Monmouth's drinking water.

There would be increased traffic congestion. There would be about 405 extra vehicles, increasing travel time by about ten minutes at peak times. The area's NO2 levels exceed WHO guidelines already, and extra PM2.5 which are not monitored. New residents would probably be limited to car travel as opportunities for cycling and walkers are limited.

There are not very good job opportunities in Dixon and no playground facility.

A better site is at Wonastow Road, Monmouth, which offers better Housing and Employment opportunities, and is within easy walking distance of some major employers. The soil is suitable for SuDS (free draining) and is downstream of where Monmouth takes its drinking water, and is not so environmentally sensitive.

Thank you for your time in considering my issues with your plans.

Yours faithfully



Virus-free [www.avast.com](http://www.avast.com)

**3695**

**John Wallace**

[REDACTED]

[REDACTED]

[REDACTED]

## **A Response to the proposed RLDP plan for Penperlleni**

### **I wish to put on record my objection to the proposed use of Trem Yr Ysgol has an access point for the proposed development**

#### **To The Planning Department**

I first heard of this MCC initiative a few weeks ago, and in particular the part of the initiative that could well have a disastrous impact for those people living on The Acres, so I recently attended your meet and greet at Goytre Village hall where the rumours that we had heard were confirmed.

There were apparently 4 sites considered for development in Penperlleni. Votes were cast, and 3 sites were rejected, although the reasons given for the rejection of 3 of the sites have not been released to us at this time. The lack of transparency is quite staggering, especially when you remember the criticism by the Welsh Assembly on a proposed development in Usk. At no time did the Council, or our own representative on the Council, communicate with us on this procedure. Any information freely given has been by way of hints and tips.

This plan outlines development proposals with regards to the allocation of land that they consider suitable for future development, and in particular planning applications to satisfy the need for new housing sites for example. The Acres proposal should be of major interest and concern to anyone living in Penperlleni, and in particular, School Lane, The Acres, Clos Telyn, Folly View close, and roads on or near Trem yr Ysgol. As you will know, the land selected for development is the field on the other side of the hedge at the end of Trem Yr Ysgol. The proposal is for approximately 42 houses, including much needed Social Housing. In general most people would regard houses being built there in a positive manner, but the most important thing about any development are the **Access Points**.

We believe that the Welsh Assembly has previously refused planning for this site, although we do not have the reasons for such a refusal, but it is highly likely that this is a safety issue with regards to access onto the trunk road. Private off-the-record information that we had at this time suggested that the MCC solution was to extend Trem Yr Ysgol, going across the wildflower meadow and trees, through the hedge and onto the field. This was confirmed at this meeting.

Prospective purchasers were informed that this was protected land. We, the residents, have been paying a considerable amount each year for its development and maintenance to Green Belt, who own the land. Clearly the council has no rights of access. Due Diligence should have made this obvious to the council, and in particular the Planning Dept, before these votes were taken, and the glossy brochure produced.

Let me proceed allowing for the ignorance of those making these decisions. Let's assume that this crazy plan were to be adopted.

- **Construction Traffic:** All traffic needed for the development of this site would need to use School Lane, Clos Telyn, Folly View Close and Trem Yr Ysgol. Heavy plant, contractors, delivery drivers, etc etc etc, back and forwards throughout its development, and all using the same School Lane and Clos Telyn access
- **When completed,** taking previous developments into consideration, more than 80 vehicles belonging to the residents would have to use this route daily, including many working unsociable hours, which will inevitably have a detrimental effect on the residents. When you add to this the many delivery vehicles that would also use this route, the danger to all of our residents, and particularly our children is obvious.
- **School Availability:** Has any consideration been given to the availability for school provision, especially as this proposed development is likely to be composed of young families?

Furthermore this would mean that the children would have to use the same route that the many vehicles would be using throughout the day. It's bad enough on school Lane now with vehicles using it as a shortcut to the main road, many of whom totally ignore the speed restrictions.

- **Shops:** We only have 1 small village shop which at present has a very limited stock. Most of the residents use their cars etc to visit Cwmbran or Abergavenny to do their shopping. Failing that they use delivery vans. Any new development would undoubtedly increase the traffic flow considerably again putting residents and our children in more danger
- **Traffic calming:** Over the past 5 years I have made repeated requests to the Traffic department for traffic calming measures on the far end of Trem Yr Ysgol, just as they are on the entrance and exit of Trem Yr Ysgol, and they continue to refuse these requests. They were informed of two very dangerous near misses for our children in September and October of this year, but still they take no action. They have not even visited this site to discuss concerns with the residents.

The Traffic Department's view is that they '**cannot put speed bumps on the corner of the T junction as it might damage vehicles**'. Who puts traffic calming on corners? The whole idea of traffic-calming is to place them on the straight piece of road to slow down vehicles before getting to the corners, **something that is already present on the entrance to Trem Yr Ysgol**. It will be our children who will have to navigate their way to school etc if this plan were adopted.

Maybe I am being somewhat cynical, but could it be that the resistance to carry out this work is because this plan has always been considered since the development of the Acres

- **Delivery drivers** continue to use our roads as an opportunity to speed up delivery times. They cannot carry out 3 point turns as the roads are too narrow, so the T junction on Trem Yr Ysgol is the turn around spot. Vehicles drive both forward and in reverse at high speed as there is nothing in place to stop them, and the number of deliveries and vehicles would increase dramatically.
- **Exit Point:** If this plan were adopted the already dangerous exit from The Acres/School Lane onto the trunk road will be the only way for all this traffic to flow. With a 40mph blind bend to the left and right, this exit point is always full of danger, especially for those who wish to travel in the direction of Abergavenny . Can you imagine parents dropping off and picking up their children alongside delivery vehicles, residents vehicles, and plant vehicles all trying to exit onto the trunk road?

During peak times parents who wish to drop off or pick up their children from the school, park on pavements or anywhere else that they can use. Mornings and afternoons are mayhem.

I have attached a few pics of the mayhem that already exists. Why has this not been considered???











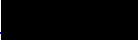




**3696**

**Jon Bessant**

**Archived:** 10 February 2025 11:46:54

**From:** 

**Mail received time:** Sat, 14 Dec 2024 09:08:19

**Sent:** Sat, 14 Dec 2024 09:08:02

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

**Subject:** Q10 of the RLDP for candidate site CS0232

**Importance:** Normal

**Sensitivity:** None

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Dear Sir/Madam

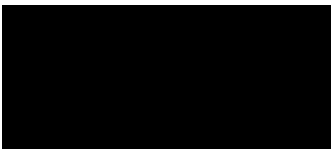
Please consider by below objections to Q10 of the RLDP for candidate site CS0232

I strongly object to the proposed development of 26 houses above Redlandes in Shirenewton.

I am a resident of Earlswood, and I believe the proposal poses many major risks which include; affecting the environmental beauty and biodiversity of the area, disrupting wildlife habitats and potentially endangering protected species, as a conservation area I believe the development conflicts with the Monmouthshire Local Development Plan (LDP), which emphasises the importance of protecting conservation areas and ensuring developments are sympathetic to their surroundings.

I am also very concerned about the effect on the areas infrastructure, I do not believe the current road network can support an increase in traffic and I believe this poses a safety risk for other road users especially horses and cyclists on the Earlswood road, as this is a national speed limit road it is already difficult at times to turn out onto the road and is becoming almost impossible to safely hack out along this previously safe hacking route. I also believe the strain on water, electricity, and sewage systems could lead to service disruptions for existing residents, we already have numerous water outages in the Earlswood area and have been told there isn't funding to improve this.

I would be very grateful if you could consider these objections.



**3697**

**Jon Weaver**

**Archived:** 10 February 2025 11:22:16

**From:** [REDACTED]

**Mail received time:** Sun, 15 Dec 2024 22:12:20

**Sent:** Sun, 15 Dec 2024 22:12:02

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

**Cc:** [REDACTED]

**Subject:** Objections to Burrium Gate Phase 2

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[LDP View close.jpg](#)  [LDP View Mid.jpg](#) 

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Like many people in the local area, I would like my objections to Burrium Gate Phase 2 to be taking into consideration when considering the LDP for Usk.

I obviously have the same concerns as most, concerning the risk of flooding, traffic, water run-off, Environmental impact, River Health, etc...

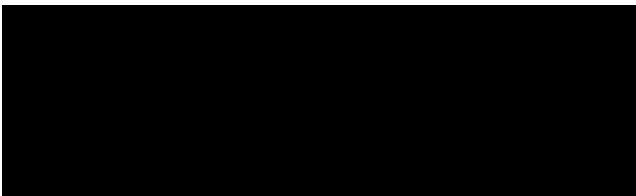
However my primary objection is the visual blight it will cause, not only to the local area, but specifically many of the residents of Burrium Gate Phase 1 and more importantly ourselves.

With the hill rising to many of meters immediately behind my boundary, the idea of a 'wall' of houses appearing is unthinkable to me..

It will not look ugly and ruin the skyline of Usk, it will have a huge impact on our outlook and more importantly, will mean that our house and garden will be overlooked by 10s if not 100s of windows meaning all sense of privacy and security will be gone for ever.

I do not believe the site selected in the current LDP is a good choice for this reason alone and hope that common sense prevails.

Please see attached photo which shows the view from my house. You can easily imagine the impact this will have on us should this hill side be populated with houses!











**3698**

**Julia Buchanan**

**Archived:** 10 February 2025 11:18:21

**From:** [REDACTED]

**Mail received time:** Thu, 12 Dec 2024 12:52:13

**Sent:** Thu, 12 Dec 2024 12:53:30

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

**Subject:** RLDP Deposit Plan Consultation CSO02032

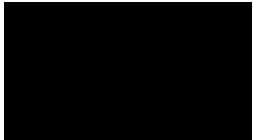
**Importance:** Normal

**Sensitivity:** None

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I object to the Replacement Local Development Plan proposal CSO2032 for the construction of a housing development with 26 houses. Shirenewton consists mainly of old historical buildings and houses with individual character. The roads and lanes are narrow. Even the two way roads have some areas where it is single file. A housing estate of this magnitude would increase the traffic through the centre of this beautiful village. The village school does not have capacity for additional children and public transport is practically non existent. Therefore people will be forced to drive to schools, shops etc.

Shirenewton is one of the most desirable places to live in Wales. Please do not ruin this lovely village and make it into another town.



**3699**

**Julie Bull**

**From:** [REDACTED]  
**Sent:** Mon, 16 Dec 2024 09:27:01  
**To:** [MCC - PlanningPolicy](#)  
**Subject:** Development, Crick, Caldicot  
**Importance:** Normal  
**Sensitivity:** None  
**Archived:** 10 February 2025 11:16:29

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Dear Sir/Madam

I would like to raise my concerns over the above development on the grounds of over development of this area leading to problems with Drs, dentists, chemists, schools, roads, etc.

This area has been developed enough and will be spoilt by further housing.

[REDACTED]

**3700**

**June Hawkins**

**Archived:** 10 February 2025 11:13:28

**From:** [REDACTED]

**Mail received time:** Sun, 15 Dec 2024 12:43:12

**Sent:** Sun, 15 Dec 2024 12:43:01

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

**Subject:** Replacement Local Development Plan

**Importance:** Normal

**Sensitivity:** None

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I live in Raglan and wish to Object to the proposed development of the Land South of Monmouth Rd. for the "Approx" 54 new houses.

"Approx" leaves the door open to an indefinite number of houses once Planning permission has been granted.

This site was originally passed by MCC for 111 houses but overturned by the Welsh Government Inspector.

The Replacement Plan does not address ANY of the issues raised at that time when the Inspector turned the plan down.

Incomers would purchase these houses.

There is already a development of 20 plus houses down by the surgery.

Plus the recent approval of 21 new houses on the Amenity site off Monmouth Road. The latter was not in the LDP. Nor was it included in a future possible candied site. It was an area of amenity importance in the LDP ( Policy DES 2 (a) (b) and (c) ) !!

Surely these houses are enough for Raglan people.

Why is the Council trying to turn Raglan into a town???

Public transport to and from Raglan is extremely limited:

There is NO rail link to Raglan

The bus links are incomparable with most employment opportunities. To Newport, Cardiff and Bristol etc

Thus, there would have to be increasing car use to get to work. This conflicts with Planning Policy Wales.

Monmouth Road has houses on the opposite side which EACH individually open onto Monmouth Road often with almost Blind access which is already extremely hazardous.

The junction of Monmouth Road onto the A40 is already EXTREMELY dangerous and the vastly increased traffic to work from such a housing development, where there is likely to be 2 cars in each household, would be enormous.

It is for these reasons that I Object to the RLDP proposed site of "Approx" 54 new houses on the site of land South of Monmouth Road.



[Sent from Yahoo Mail for iPhone](#)

**3701**

**Kathy Howe**

**Archived:** 10 February 2025 11:06:34

**From:** [REDACTED]

**Sent:** Fri, 13 Dec 2024 20:05:53

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

**Subject:** Objection to candidate site CS0232 land west of Redd Landes, Shirenewton

**Importance:** Normal

**Sensitivity:** None

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To whom it may concern

We are strongly opposed to the RLDP proposal to construct 26 residential properties on the above site.

The village has a unique atmosphere and is of historic importance, with a medieval church and many houses dating back to the late Middle Ages. The proposed development is very large compared to the size of the village and would have a detrimental impact on the current infrastructure, and the character of the village.

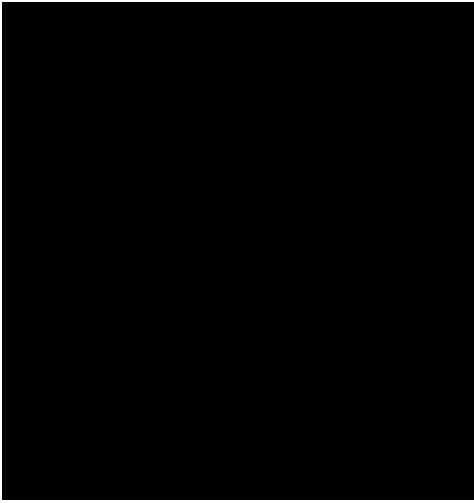
An increase of 50 – 75 extra vehicles on the roads would increase the risk of accidents considerably, bearing in mind that the lanes are used by heavy farming equipment, like combine harvesters and heavy tractors. Visibility on the lanes and the roads in Shirenewton and Mynyddbach is already limited due to the very nature of the narrow lanes, therefore the increase in pedestrians and vehicles would pose a significant risk to safety.

All new residents would need a private vehicle as public transport to the village is very limited, with only a few busses per day. In addition, there are no shops or any medical amenities and the local school is already oversubscribed therefore, again, increasing the amount of cars using the roads.

The village has a diverse wildlife population, including several protected species. Just behind the proposed site, there is a pond which is teeming with life, dragonflies, mallards, pheasants, fieldmice, just to name a few. The increased population with the inevitable noise and disturbance will have a significant impact on this wildlife habitat.

For the reasons above, but not limited to, we strongly oppose this development

Yours sincerely



**3702**

**Keith Plow**



Office Use Only  
Representor Number  
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.....  
.....  
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## Monmouthshire Deposit Plan Representation Form

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

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

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

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

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

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

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



Office  
Use Only  
Representor  
Number  
.....  
.....  
.....  
.....

**Part 2: Your Representation**

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

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

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

WHERE ARE LOCAL FACILITIES TO SUPPORT THESE CHANGES, PARTICULARLY THE TRAFFIC FACILITIES, WHICH ARE ALREADY INUNDATED/ OUTDATED, CAUSING DAILY PROBLEMS?! THE FRUSTRATIONS OVER CHANGING PLANS,! I.E. THE BYPASS AT THE TOP OF DANCING HILL CANCELLED FOR EVEN MORE HOUSING !!!

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

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



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

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

HOW ABOUT THE PRE-PLANNING!  
PRESENT FACILITIES ARE INADEQUATE,  
AND THE USE OF "OUTDATED DATA", IS  
VERY POOR, LET'S HAVE PROPER FORWARD  
PLANNING, NOT OLD INFORMATION! 1

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

Is your representation in support or objection?

Support:

Objection:



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

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

LET'S HAVE A WELL PREPARED INVITE/  
MEETING TO DISCUSS THESE THINGS?





<b>4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)</b>		
Is your representation in support or objection?	Support:	
	Objection:	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p>		



<p><b>5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 &amp; HE3)</b></p>		
<p>Is your representation in support or objection?</p>	<p>Support:</p>	
	<p>Objection:</p>	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p>		

<p><b>6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 &amp; CC3)</b></p>		
<p>Is your representation in support or objection?</p>	<p>Support:</p>	
	<p>Objection:</p>	✓
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p>		



LET'S BE REALISTIC AND POSITIVE?  
IT HAS TO HAPPEN TO SAVE US  
AND OUR FOLLOWERS IN THE FUTURE?  
BUT IT NEEDS TIME (UNFORTUNATELY!)  
AND GOOD PLANNING OVER A PERIOD?  
AND MONEY?

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?  
(Policies S5, G11, G12, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)

Is your representation in support or objection?

Support:



Objection:

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

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

WE ARE SUPPOSEDLY "HUMAN BEINGS" AND RELY  
ON ~~PLANNING~~ NATURE, BEFORE IT'S TOO LATE,





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

Is your representation in support or objection?

Support:

Objection:

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

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

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



Is your representation in support or objection?	Support:	✓
	Objection:	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p> <p style="font-size: 1.2em; font-family: cursive;">LET'S SATISFY FULFILLING THE BAND OF PERSONS AND NATURE, NEEDING SUPPORT, BEFORE IT IS TOO LATE!</p>		

<p><b>10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)</b></p>		
Is your representation in support or objection?	Support:	
	Objection:	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p>		



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

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

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

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



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

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

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

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

KEEP THEM CONVENIENT TO THE WORKFORCE ?

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

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



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

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

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

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

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

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

TOO MANY CARS, WE NEED MORE PUBLIC TRANSPORT!! LET'S BECOME MORE EFFICIENT. ACCESS TO FACILITIES, BOTH FOR WORK/LEISURE/SHOPPING/MEDICAL SUPPORT/SCHOOLS.



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

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

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

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

MORE LOCAL, CONVENIENT CENTRES.



<p><b>16. Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 &amp; CI4)</b></p>		
<p>Is your representation in support or objection?</p>	<p>Support:</p>	✓
	<p>Objection:</p>	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p> <p>If you are objecting, please state how you would like the Plan to be changed.</p> <p style="font-size: 1.2em; font-family: cursive;">             COMMUNITY STARTS IN THE HOME/              STREET / WORK / SCHOOLS - LETS SUPPORT              OUR TOTAL <u>SOCIAL</u> ENVIRONMENT, THAT'S              BEING <u>NATURAL</u> HUMAN BEINGS, BUILDING              INITIATIVE / ABILITY EFFORT / SUPPORT.         </p>		

<p><b>17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 &amp; W3)</b></p>		
<p>Is your representation in support or objection?</p>	<p>Support:</p>	✓
	<p>Objection:</p>	
<p>Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).</p>		



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

GO TO THE SOURCE FOR IDEAS, LET  
IT BECOMES A NETT PROVISIO, LIMITING WASTE  
AND RAW MATERIALS.

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

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

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

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



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

Do you consider that the Plan is sound?	Yes:	
	No:	✓
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? <input type="checkbox"/>	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? <input type="checkbox"/>	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? <input type="checkbox"/>	Fails Test 3: Will the Plan deliver (is it likely to be effective)? <input type="checkbox"/>	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):		
<p>WHAT ABOUT ALL THE ONGOING CHANGES THAT HAVE HAPPENED WITH PEOPLE MOVEMENT - WHY / LANGUAGE / RELIGION / COLOUR / SEX JUST TO NAME A FEW</p> <p>WE ARE STILL USING OUTDATED QUESTIONS!!!</p> <p>WE MUST BE MORE EFFICIENT, AND LIFE HAS TO BE SIMPLIFIED IF WE ARE TO GO ON!!!</p>		



**Part 4: Appearance at Examination Hearing Sessions**

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

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

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



## Part 5: Welsh Language

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

PROBABLY LESSENING IT'S USE, THIS IS HAPPENING WORLDWIDE. VARIETY IS OPPOSITE THE SPACE OF LIFE - WE NEED TO CONSIDER THIS AS IT IS IMPORTANT? BUT PERHAPS LIKE ALL THE OTHER INVENTIONS IT MIGHT BE RESOLVED ACADEMICALLY?

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





## Guidance Notes

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

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

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

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

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

### Tests of Soundness

#### Preparation Requirements:

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



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

Questions:

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

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

Questions:

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

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

Questions

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



### **New or Amended Sites**

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

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

### **General Data Protection Regulation (GDPR)**

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

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

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

**3703**

**Kelly Fuller**

**Archived:** 10 February 2025 11:02:14

**From:** [REDACTED]

**Sent:** Mon, 16 Dec 2024 21:25:40

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

**Subject:** Replacement Local Development Plan 2018-2033 Caldicot East

**Importance:** Normal

**Sensitivity:** None

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## Dear Sir/Madam

I am writing this email to you to give my objections to the proposed redevelopment plan of Caldicot East.

I am a born and raised resident of Caldicot of nearly 45 years.

20 of those years I have lived happily and peacefully in a street called [REDACTED]

The back of my house looks out onto the fields earmarked for redevelopment.

I have objected previously many years ago to a redevelopment of this beautiful area.

This is an area of stunning scenic views from my house and from standing on Church Road and looking directly down the fields.

These fields over the years through the spring/summer months have had horses, cows and sheep grazing.

It's a beautiful sight to look out of my bedroom window and see this.

Also this area is also home to bats, which I regularly see around my garden.

There is an abundance of wildlife eg badgers etc and insects in this area aswell as many different birds eg hawks, geese, ducks and many more species.

Some of these birds are attracted to this area because of the River Neddern which flows right through the proposed redevelopment. It will be such a loss not to see this anymore or be able to hear the wildlife, which will happen if this redevelopment goes ahead.

Every year I have seen these fields flood during the winter months, huge volumes of water, which has been publicly documented by Caldicot Castle and local news groups.

The local community were hoping to use this to our advantage in the future with the hopes of creating an area for kayaking and canoeing which people do use it for at the moment, they enter the water from the field directly behind my house and kayak up towards Caerwent.

This obviously would not happen if houses are to be built there and the wetlands area which attracts all the birds would be no more.

My other concerns are for light pollution and air pollution of more vehicles around this area. We also have insufficient infrastructure. Our locals roads are struggling right now as it is.

For an area that is labelled as the 'Gateway to Wales' we have shockingly bad transport links.

Forcing people into their cars and onto the already crammed roads in Caldicot and surrounding areas.

We have insufficient school, doctors, pharmacy and dentists space.

We have seen a sad decline in amenities and shops in our town.

Caldicot and surrounding towns and villages are now sadly nothing more than commuter towns and villages.

These are my concerns for this redevelopment.

I only hope for our future generations and the local wildlife they will be taken into account.

[REDACTED]



Sent from my iPhone

**3705**

**Lisa Langston-Able**

**Archived:** 10 February 2025 10:53:38

**From:** [REDACTED]

**Sent:** Mon, 16 Dec 2024 22:38:24

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

**Subject:** RLDP Objection

**Importance:** Normal

**Sensitivity:** None

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Dear Sirs

Re: Mounton Road, Chepstow

I oppose the inclusion of the Mounton Road development in the RLDP.

The Mounton Road development proposal appears to conflict with several key legal and policy frameworks that guide sustainable development in Wales. The Planning (Wales) Act 2015, along with the Wellbeing of Future Generations (Wales) Act 2015, emphasizes the need for sustainable development that balances economic, social, and environmental considerations. Local residents argue that the Mounton Road development fails to meet these criteria, particularly in relation to environmental sustainability and health. The development will increase air pollution, traffic congestion, and put further strain on already stretched public services, all of which run counter to the goals of these acts.

Furthermore, the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP) identifies objectives that the proposed development would fail to meet, particularly those related to green infrastructure, biodiversity, and the resilience of Monmouthshire's natural environment.

The development's location on high-grade agricultural land, which is part of the 'Green Wedge' between Chepstow and Mathern, also raises concerns about the loss of valuable natural resources and the negative impact on the local landscape.

The Welsh Government's Environmental Air Quality and Soundscapes Act 2024 and the Public Health Act 2017 also appear to be in conflict with the proposed development, as it could worsen air quality and harm public health, particularly in a town already facing significant pollution challenges. The development's lack of a clear plan to address these concerns raises questions about whether it fully complies with the legal requirements set out in these acts.

Residents have pointed to previous objections to similar developments in the area, with local councillors expressing concern over the lack of infrastructure to support such growth. In 2013, a proposal for 200 new homes on Mounton Road was rejected for many of the same reasons, including the inability of the town's infrastructure to cope with the added pressure. With the current proposal still lacking concrete plans to mitigate these impacts, it is argued that the development should not be included in the final RLDP.

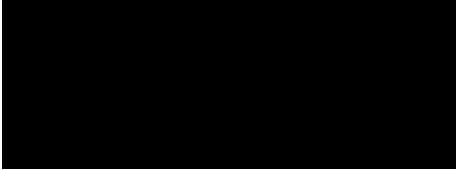
Previous objections numbered around 800 with only around 4 in favour. It was clear then that residents had valid reasons to object to these plans and the Council should go back and look at these objections.

In conclusion, the proposed Mounton Road development is seen by many local residents as incompatible with the well-being and sustainability objectives set out by Welsh Government and local planning authorities. The development threatens to exacerbate air pollution, worsen traffic congestion, strain local services, and degrade the natural and historical character of Chepstow. It is in conflict with several key acts and policies, including the Wellbeing of Future Generations Act, the Public Health Act, and the Environmental Air Quality Act.

Given these concerns, residents are urging local authorities to reconsider the inclusion of this development in the final Replacement Local Development Plan, as it is perceived to offer more harm than benefit to the community's long-term health, sustainability, and well-being. Formal complaints are being considered if the development proceeds without

adequate consideration of these critical issues.

Yours faithfully



**3706**

**Lisa Smith**

Archived: 08 March 2025 14:49:53

From: [REDACTED]

Sent: Mon, 16 Dec 2024 21:26:51

To: [MCC - PlanningPolicy](#)

Subject: Fwd: Land at Mounon Road Chepstow, Monmouthshire DM/2024/01242

Importance: Normal

Sensitivity: None

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Sent from my iPhone

Begin forwarded message:

From: [REDACTED]

Date: 16 December 2024 at 21:26:07 GMT

To: [REDACTED]

Subject: Re: Land at Mounon Road Chepstow, Monmouthshire DM/2024/01242

EXTERNAL EMAIL : DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Sent from my iPad

On 16 Dec 2024, at 21:21, Lisa Smith <lisasmith911@btinternet.com> wrote:

?

I wish to submit an objection to this proposed development on the following reasons.

The area has been designated as green belt since 1981 and is also within an area of ONB. Chepstow does not have the infrastructure to accommodate such a development. From a highways point of view Chepstow is desperate for a bypass and the traffic congestion leading to the Severn bridge is at maximum capacity. Both the doctors surgery's and schools are also stretched. There are more suitable development opportunities in Monmouthshire than this proposed site. It would also have a detrimental effect on the historic market town of Chepstow. If this development was to go ahead it would be more akin to Milton Keynes. Chepstow no longer with the closure of major employers such as Fairfield Mabel and Dendix has an abundance of employment in the local area. The development of both the hotel and care home will bring at best minimum wage employment opportunities. I have been a [REDACTED] and feel if this development goes ahead will change Chepstow into one massive housing estate.

**3707**

**Luke Dudgale**

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## **Welsh Government Planning Policy**

### **Planning Policy Wales (Edition 12) February 2024**

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: *Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.*

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*· Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
  - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population’s daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government’s commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

**Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### **Self-Containment**

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
--	---------	------	---------	------	---------	------	---------	------

**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3

<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network

Maps as an Active Travel cycle route nor as future route but is mentioned on the website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so. This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the

distance between the settlements is less than 3 miles. The reasons for the difference in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

### Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

<b>Principle 1 – Sustainable Transport and Accessibility</b>		
<b>SEWSPG Approach</b>	<b>Monmouthshire Approach</b>	<b>Reasons for Difference</b>
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

### Objector’s comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any shops, post office, banks, or even a single café. Therefore, for convenience stores and other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

*Preferred Strategy paragraph 4.32 states 'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs. It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**Archived:** 11 March 2025 08:35:31

**From:** [REDACTED]

**Sent:** Mon, 16 Dec 2024 08:29:12

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

**Subject:** RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

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Dear Sir/Madam

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

Regards

[REDACTED]

**3708**

**Mair Liddell**

**From:** [REDACTED]  
**Mail received time:** Sun, 15 Dec 2024 13:18:06  
**Sent:** Sun, 15 Dec 2024 13:18:03  
**To:** [MCC - PlanningPolicy](#)  
**Subject:** RLDP Objection  
**Importance:** Normal  
**Sensitivity:** None  
**Archived:** 10 February 2025 10:43:41

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>>

>> Dear Sir

>>

>> OBJECTION TO THE INCLUSION OF MOUNTON ROAD FIELDS WITHIN POLICIES H1 AND HA3 OF THE MONMOUTHSHIRE RLDP

>>

>> These fields have been protected from development by planning policies for the last 43 years. There has not been a comprehensive analysis of the impact of the development proposed, and there are other sites that are more suitable. I therefore object to the inclusion of Mounon Road Fields within Policies H1 and HA3

>>

>> I would wish to attend the EIP and to address the Inspector

>>

>> Yours sincerely

>>

[REDACTED]

>

**3709**

**Mr Iain Ormrod**

## View results

Respondent

528

Anonymous

35:28

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Development Site at Mounton Road, Chepstow.

Overall I am supportive of the plan and the development at Mounton Road, however, the continued daily congestion at High Beech roundabout must be addressed before the development can take place.

A bypass for Chepstow has been discussed for many years, but is very unlikely to happen. My suggestion is to make several smaller improvements to the surrounding road network in order to reduce congestion at High Beech, and improve peak traffic flow to the benefit of the whole area.

1. The A48 crosses the M48 at two places, Hayesgate and Crick. If a new junction were constructed, it would remove any traffic heading east or west from Chepstow, lessening the congestion at the roundabout. This would also reduce pollution in Pwllmeyric, as it would no longer be a thoroughfare for traffic heading towards the M48.

2. Widen the A466 by one lane between Thornwell and High Beech. Currently any traffic coming off the M48 goes from 2 lanes, to 1 lane, back to 2 lanes, and then back to 1 lane. This causes congestion at both roundabouts. Two lanes would improve northbound traffic flow at Thornwell, and southbound traffic flow at High Beech, by removing the bottlenecks to traffic flow.

3. Create a right turn lane for westbound traffic on the A48 Newport Road in Chepstow, wishing to turn into the Esso garage, Subway or Toolstation. The High Beech roundabout regularly comes to a gridlocked standstill due to westbound cars stopping to turn right. The road is not wide enough at present for this lane, but support could be sought from the Esso garage to move the footpath onto their land, thereby creating space for the right turn lane.

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Please see previous comments

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

## Part 5: Welsh Language

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

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

**3710**

**Mr MA Huxtable**

## View results

Respondent

543

Anonymous

06:52

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

CS0232

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

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

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

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

\*

CS0232

MONMOUTHSHIRE RLDP DEPOSIT PLAN CONSULTATION - OBJECTION CS0232 LAND WEST OF REDD LANDES, SHIRENEWTON

Objection – Residential development (growth) should be accommodated at more sustainable settlements than Shirenewton.

#### Settlement Hierarchy

In order to effectively assess the role and function of each settlement, an audit of existing services and facilities was undertaken by Monmouthshire County Council during October 2022 (Sustainability Settlement Appraisal, 2022). This audit was based on 3 principles:

Principle 1 – The level of sustainable transport and accessibility in and around settlements

Principle 2 – The availability of local facilities and services in and around settlements

Principle 3 – The level of employment opportunities in and around settlements

A scoring system was then applied in line with the above principles.

The SSA ranked the settlements based on their Weighted Scores against the 3 Principles. While the combined scores identify all of the above settlements as Tier 3, 'Tiers' associated with each individual principle are also provided and colour coded. See the table 1 below:

Hierarchy of Settlements based on their weighted scores against the 3 Principles (as set out in the SSA, 2022)

Settlement Principle 1 (Score as weighted % and Tier) Principle 2 (Score as weighted % and Tier) Principle 3 (Score as weighted % and Tier) Overall Score as weighted % and Tier

Llanover 15.6 - Tier 3 4.7 - Tier 4 10 - Tier 2 30.3 - Tier 3

St Arvans 16.7 - Tier 3 6.5 - Tier 4 5 - Tier 4 28.2 - Tier 3

Little Mill 16.7 - Tier 3 5.2 - Tier 4 5 - Tier 4 27.9 - Tier 3

Llanellen 16.7 - Tier 3 5.3 - Tier 4 5 - Tier 4 27 - Tier 3

Devauden 10 - Tier 5 5.9 - Tier 4 7.5 - Tier 3 23.4 - Tier 3

Shirenewton 10 - Tier 5 8 - Tier 3 2.5 - Tier 5 21.6 - Tier 3

Of the six options Shirenewton is the least appropriate location to accommodate development. Arguably Shirenewton shouldn't be designated a Tier 3 Settlement. It only scores amber on one principle. Llanover is the most sustainable settlement.

The settlements were also given a total score based upon their weighted scores against the 3 principles and their population size. Shirenewton is pretty much equal fourth alongside Llanover. Llanover is only equal fourth as it has a comparatively lower population than other Tier 3 settlement with 180 dwellings (Census, 2021).

Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles and Population Size

St Arvans 38.2

Little Mill 37.9

Llanellen 32

Shirenewton 31.6

Llanover 31.4

Devauden 28.4

#### Draft Deposit Residential Allocations at Tier 3 Settlements

The Deposit Plan allocates no land for residential development in Llanover. Residential allocations are proposed in the following Tier 3 settlements:

- Devauden – 1 site, 20 homes
- Little Mill – 2 sites, 35 total homes
- Llanellen – 1 site, 26 homes
- Shirenewton – 1 site, 26 homes
- St Arvans – 1 site, 16 homes

The evidence base to justify an allocation at Shirenewton is at best weak. If capacity exists at other Tier 3 settlements, such as Llanover, growth elsewhere will be more sustainable than at Shirenewton.

Accordance with National and RLDP Policies and Objectives

Given Shirenewton is the least sustainable Tier 3 settlement utilising a site that is partly Best and Most Versatile (BMV) agricultural land further weakens the rationale for the proposed allocation of CS0232.

Shirenewton is situated within the area for green belt consideration as per Future Wales 2040.

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
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- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

MONMOUTHSHIRE RLDP DEPOSIT PLAN CONSULTATION - OBJECTION CS0232 LAND WEST OF REDD LANDES, SHIRENEWTON

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Of the six options Shirenewton is the least appropriate location to accommodate development. Arguably Shirenewton shouldn't be designated a Tier 3 Settlement. It only scores amber on one principle. Llanover is the most sustainable settlement.

The settlements were also given a total score based upon their weighted scores against the 3 principles and their population size. Shirenewton is pretty much equal fourth alongside Llanover. Llanover is only equal fourth as it has a comparatively lower population than other Tier 3 settlement with 180 dwellings (Census, 2021).

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Accordance with National and RLDP Policies and Objectives

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Shirenewton is situated within the area for green belt consideration as per Future Wales 2040.

## Part 4: Appearance at Examination Hearing Sessions

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

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

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No

## Part 5: Welsh Language

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

## About you

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

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

**MONMOUTHSHIRE RLDP DEPOSIT PLAN CONSULTATION - OBJECTION CS0232 LAND WEST OF REDD LANDES, SHIRENEWTON**

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Llanellen	16.7 - Tier 3	5.3 - Tier 4	5 - Tier 4	27 - Tier 3
Devauden	10 - Tier 5	5.9 - Tier 4	7.5 - Tier 3	23.4 - Tier 3
Shirenewton	10 - Tier 5	8 - Tier 3	2.5 - Tier 5	21.6 - Tier 3

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---

<sup>1</sup> Tiers 1 and 2 are green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 are amber as they have a lower level of sustainability and tiers 5 and 6 have the lowest scores and thus are the least sustainable, red.

The settlements were also given a total score based upon their weighted scores against the 3 principles and their population size. Shirenewton is pretty much equal fourth alongside Llanover. Llanover is only equal fourth as it has a comparatively lower population than other Tier 3 settlement with 180 dwellings (Census, 2021).

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Shirenewton is situated within the area for green belt consideration as per Future Wales 2040.

**3711**

**Mark Morris**

**Archived:** 10 February 2025 10:40:56

**From:** [REDACTED]

**Mail received time:** Mon, 16 Dec 2024 22:35:50

**Sent:** Mon, 16 Dec 2024 22:35:33

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

**Subject:** RLDP Consultation Response Site HA4

**Importance:** Normal

**Sensitivity:** None

---

Dear Planning

I wish to make an objection to the proposed development off Dixon Road in Monmouth.

This area of the town has already seen flooding on the proposed fields in recent years.

This area already suffers from large traffic issue with congestion on the dual carriageways which will also increase the traffic population for the residents that already live in this area of the town.

Kind regards

[REDACTED]

**3712**

**Miss J**

## View results

Respondent

119

Anonymous

05:57

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

### Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Chepstow cannot simply take any more houses! Our doctors, school and dentists are already struggling. The traffic to get in and out of Chepstow is chaos every day not to mention the air pollution is already bad

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

13. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Worst place for traffic

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

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

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

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Traffic

#### Part 4: Appearance at Examination Hearing Sessions

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

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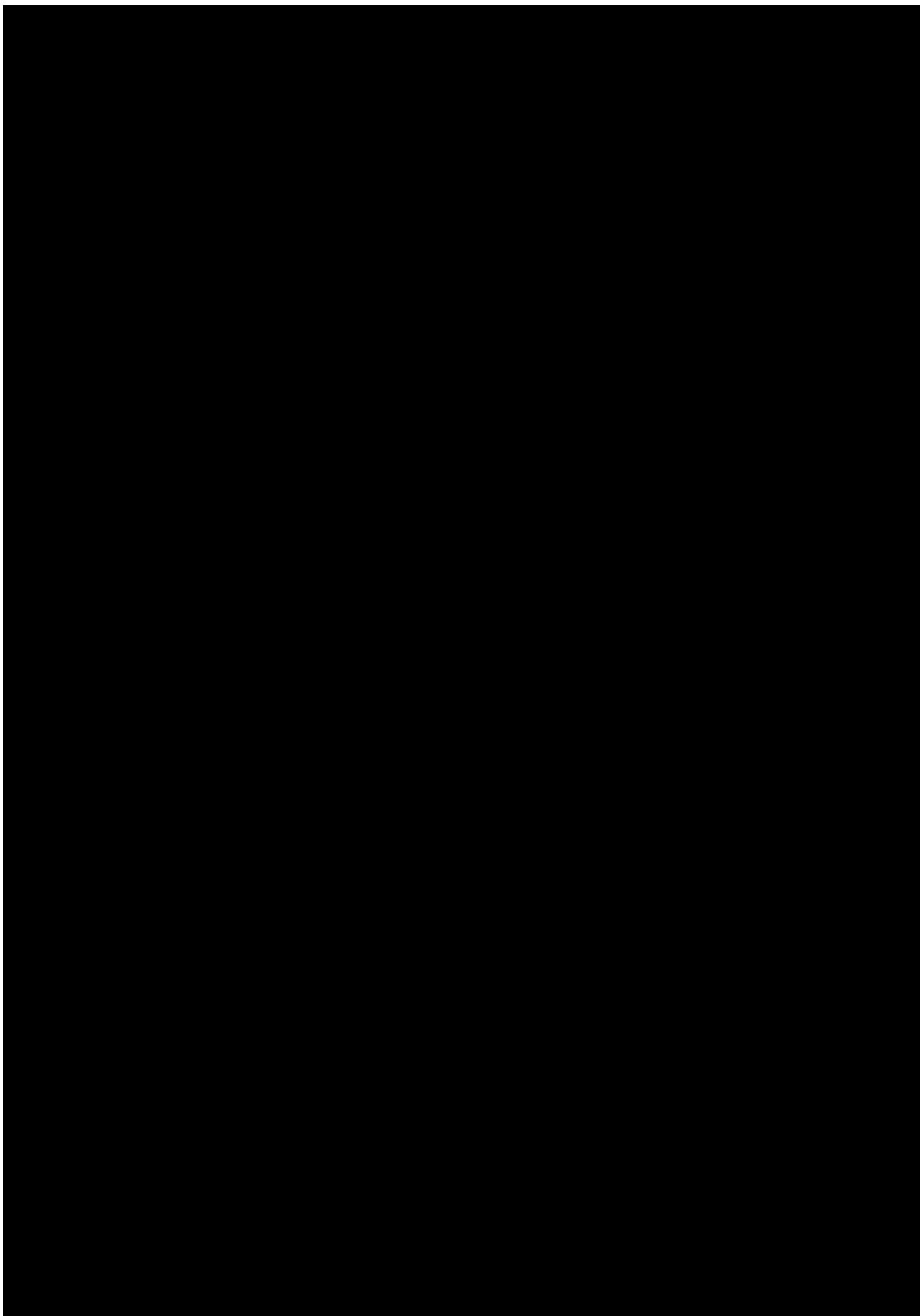
Yes

No

#### Part 5: Welsh Language

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

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**3713**

**Mark Petersen**

## **MCC RLDP 2024 comments – the impact of RDLP proposals Quay point and Gwent Euro park**

Magor and Undy have had extensive development over the past few decades, leaving very little open green spaces for recreational use. Monmouthshire's economic development land is heavily situated around Llandeenny with 48% being allocated to this area. Llandeenny is a small rural hamlet which has always comprised of around a dozen dwellings for hundreds of years. The current proposed RLDP includes the land on which two of the properties are located and will therefore forever change the historical landscape of the area. In addition the inclusion of B2 use in this area will result in the hamlet being isolated and engulfed by heavy industry as such this does not accord with policy LC1 on protection of historical landscape value.

### **Climate change and historical landscape**

Llandeenny is situated between the protected monument of Wilcrick hill Camp an iron age hillfort a short distance from Llandeenny . Much of the area is bordered by the network of reens and ditches which make up the Gwent levels and the protected fauna, flora and species that inhabit it . Natural or semi natural land should only be developed in extreme circumstances and only where the benefits of the development exceed the losses caused by the development. The development of the proposed land in Llandeenny will result in increased run off from non porous surfaces, whilst it is likely that it will be proposed that this is mitigated via a waste management system this water will need to go somewhere. Llandeenny has two routes of access one via the back of the brewery and the other directly off the A4810, this route is bordered by reens which often overspill into the roadway, resulting in flooding. The brewery development in recent years also results in flooding due to the run off from the hard surfaces, which goes across the field and collects in the lowest point by upper cottage cutting off the access via Llandeenny road, this area is also susceptible to land slides (the road is bordered by ten foot banks). An increase in run off will perpetuate the problem. In addition, If the existing fields which currently absorb the water along with the trees are removed then the water will need to be diverted elsewhere, and then discharged into natural watercourses. This in the increasingly wetter weather runs the risk of overspill and pollution of the protected reens and the life sustained within it and the potential for a catastrophic impact on the delicate and protected environment an area which the Welsh government has committed to protect due to the unique nature of this environment. In addition the increased discharge into the ditches and reens could increase of flooding. Previous development at Gwent Euro park resulted in substantial damage to the Waundeilod reen , due to the run off containing a substantial amount of mud and contaminates from the machinery used in construction. Both proposed sites around Llandeenny are in and bordered by SSSI land, this would be in contravention of paragraph 6.4.25 which sets out that development in SSSI which is not necessary for the management of the SSSI must be avoided. Surely any development bordering SSSI should be given the same consideration especially in circumstances where the reen network is so delicate and any pollution would have devastating and irretrievable consequences, our SSSI is not a resource that can be replaced.

Wilcrick hill is a protected monument and is therefore classed as an archaeological sensitive area protected by the historic environment Wales act 2016 and ancient monument and archaeological sites, with the presumption of physical preservation. The proposed development at Quay point would affect the character and setting of the monument with the development

encompassing the hill entirely from the Magor side. This is against the national planning policy for Wales to protect, conserve and enhance historic environments for future generations, recognising that nationally important historic sites are non-renewable and limited. The area surrounding Wilcrick Hill should be protected from adverse impact and continue to allow this site to be accessible and enjoyed by future generations.

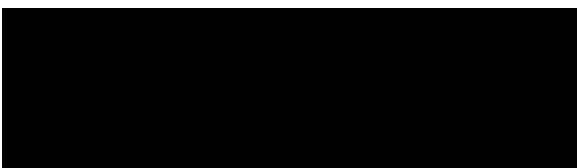
There is only one safe access to Llandeenny to Magor by foot, bike, or horse back, this being along Llandeenny Road onto Green Moor Lane, which runs through the proposed Quay Point development. The alternative route is via the busy and fast A4810, which would pose a serious risk to people and animals if there was no alternative safe route.

### **Placement and high quality design policies s3, pm1 pm2**

All designs should respect existing surroundings, including height massing, maintain reasonable levels of privacy and amenity for neighbouring occupiers. The proposal adjacent to the brewery is on land that is elevated in respect of all of the properties in the hamlet of Llandeenny, save for those which would be demolished or engulfed to allow for the development. This land is outlined in the curtilage of the RDLP. Any development would rise up above the hamlet, impacting on the neighbouring properties in respect of visual, noise and light pollution. The Gwent Euro Park proposed development will also have a visual, noise and light pollution impact. The cumulative effect on the neighbouring properties would be extremely detrimental. The current LDP identified the land for B8 use and we are aware that B2 use is being sought, having even more of a detrimental impact upon residents and wildlife.

The area of Llandeenny is rich in biodiversity, there is a well-established bat population, with Lesser horseshoe bats known to have established roosts in the area. Barn owls, Badgers, and rookeries are also present. Light and noise pollution will have an adverse effect on these species along with the residents. The cumulative impact of development has to be considered along with the detrimental impacts.

There is a brown field site in close proximity to these proposed developments, whilst this is in Newport bordering on Monmouthshire, surely in order to protect the Gwent levels and SSSI, the councils should work together and utilise brown field sites rather than to take more green land for development, this cannot be replaced and has substantial consequences, removing further green land and its plant life that would remove CO<sub>2</sub> from the atmosphere. Whilst this land was identified in the previous local development plan, the Welsh government changes to planning policy have since recognised the irretrievable damage that has been caused to the Gwent levels from development and this important landscape, with the presumption that development will not occur where it will damage these areas. We are opposed to the RLDP.



**3714**

**Mary Stephens**

**Archived:** 10 February 2025 10:38:15

**From:** [REDACTED]

**Sent:** Sun, 15 Dec 2024 12:09:10

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

**Subject:** RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

**Importance:** Normal

**Sensitivity:** None

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We are writing to strongly object to the replacement Local Development Plan proposal CSO2032 for the construction of a housing development of 26 houses adjacent to Redd Landes, Shirenewton. We agree completely to what [REDACTED] has put forward on this proposal.

We would urge the council to consider all the points mentioned by [REDACTED] Shirenewton and to reject the proposal.

[REDACTED]

**3715**

**Mr Jack Davies**

## View results

Respondent  
176 Anonymous

21:34  
Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

### Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

This is in relation to the Drewen Farm allocation.

I object the manner in which the access points to the site have been planned. The corner of Belle Etoile Drive [REDACTED] is occupied by a children's play park. This park is designed for...and used by toddlers and young children. I frequently observe children aged between 5 and 12 running across that bend into and out of the park. This behaviour is most prevalent in the summer months and during term time between 4pm and 6pm when construction traffic is likely to be using this route to exit the site.

Opposite the park is a cul-de-sac where other children live. They have become accustomed to this not being a construction site and therefore run/cycle/scoot out of the cul-de-sac to play in the park. Expecting them to change behaviour to accommodate what will now become a construction site access bend is a huge risk to their safety and wellbeing.

By designating Belle Etoile as one of two main access points, the combination of construction traffic and the park location creates a high probability of an accident [REDACTED]

An alternative construction site access point should be located outside of the estate (perhaps via a temporary route) in order to mitigate the risks on the residents of Kingswood Gate; particularly young children who have had several years growing acclimatised to the estate without construction traffic and related activity [REDACTED]

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

28. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

The roads throughout the Kingswood Gate estate are not suitable, after this period of maturing and no longer being a construction site and construction site access route, to now be designated as such.

There is a risk [REDACTED] residents of Kingswood Gate due to the placement of access points.

#### Part 4: Appearance at Examination Hearing Sessions

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

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

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

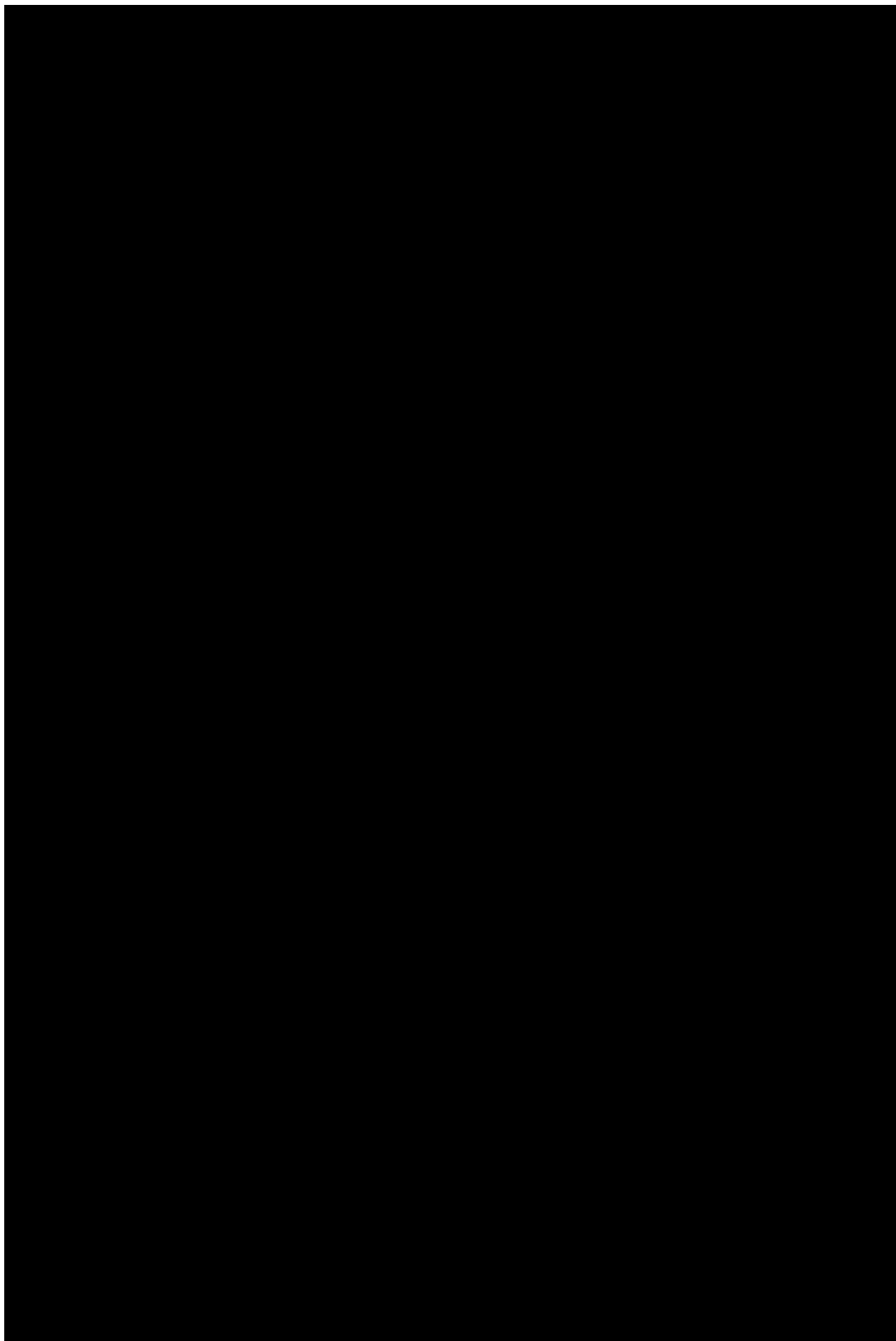
Yes

No

#### Part 5: Welsh Language

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

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



**3716**

**Matthew Smith**

**Archived:** 10 March 2025 10:52:52

**From:** [REDACTED]

**Sent:** Fri, 13 Dec 2024 14:42:32

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

**Subject:** RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

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Sent from my iPad

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## **Welsh Government Planning Policy**

### **Planning Policy Wales (Edition 12) February 2024**

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: *Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.*

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*· Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
  - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
---	----------

4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population’s daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government’s commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

**Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### **Self-Containment**

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3

<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network

Maps as an Active Travel cycle route nor as future route but is mentioned on the website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so. This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the

distance between the settlements is less than 3 miles. The reasons for the difference in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

## Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

<b>Principle 1 – Sustainable Transport and Accessibility</b>		
<b>SEWSPG Approach</b>	<b>Monmouthshire Approach</b>	<b>Reasons for Difference</b>
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

### Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any shops, post office, banks, or even a single café. Therefore, for convenience stores and other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

*Preferred Strategy paragraph 4.32 states 'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs. It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**From:** [REDACTED]

**Sent:** Mon, 16 Dec 2024 21:29:54

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

**Subject:** Land at Mounton Road Chepstow, Monmouthshire DM/2024/01242

**Importance:** Normal

**Sensitivity:** None

**Archived:** 10 March 2025 10:53:57

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> I wish to submit an objection to this proposed development on the following reasons.

> The area has been designated as green belt since 1981 and is also within an area of ONB. Chepstow does not have the infrastructure to accommodate such a development. From a highways point of view Chepstow is desperate for a bypass and the traffic congestion leading to the Severn bridge is at maximum capacity. Both the doctors surgery's and schools are also stretched. There are more suitable development opportunities in Monmouthshire than this proposed site. It would also have a detrimental effect on the historic market town of Chepstow. If this development was to go ahead it would be more akin to Milton Keynes. Chepstow no longer with the closure of major employers such as Fairfield Mabel and Dendix has an abundance of employment in the local area. The development of both the hotel and care home will bring at best minimum wage employment opportunities. [REDACTED] and feel if this development goes ahead will change Chepstow into one massive housing estate.

Sent from my iPhone

**3717**

**Mr Jack Laphorn-Graham**

## View results

Respondent

462

Anonymous

03:01

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Remove new housing from plan

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

13. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Roads are already too busy and in urgent need of relief. These houses will exacerbate this problem.

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

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

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

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

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

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

Transport hasn't been properly considered

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

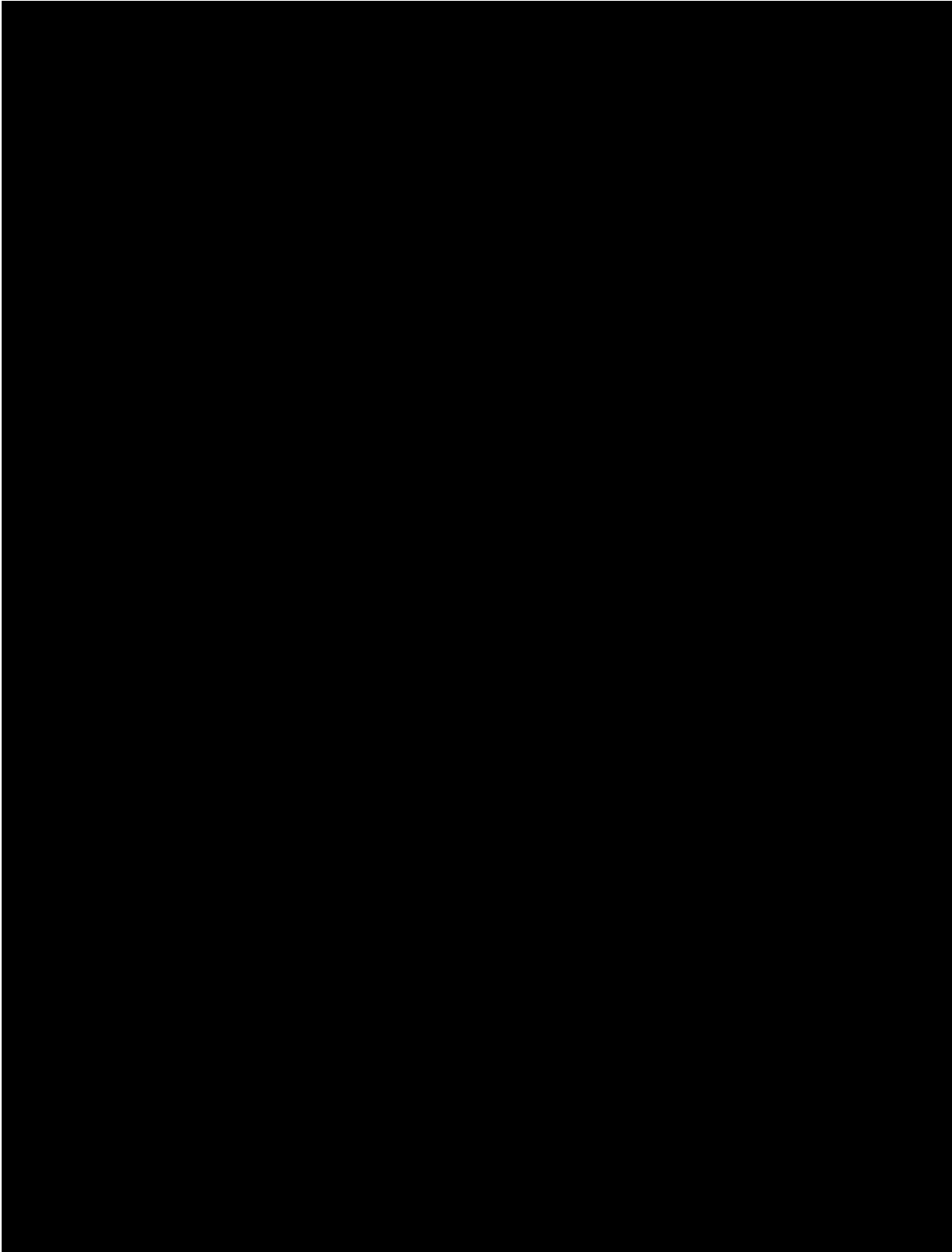
Yes

No

## Part 5: Welsh Language

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

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



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**3718**

**Max Woolmer**

**Archived:** 08 March 2025 12:29:36

**From:** [REDACTED]

**Mail received time:** Mon, 16 Dec 2024 12:26:39

**Sent:** Mon, 16 Dec 2024 12:25:53

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

**Subject:** RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx](#) 

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I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. Its houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village forever.

The fundamental reasons for the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

Thanks

[REDACTED]

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## Welsh Government Planning Policy

### Planning Policy Wales (Edition 12) February 2024

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*• Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- The presence of Active Travel Routes within the Settlement*
- Walking or cycling distance to a higher order settlement via an active travel route.*
- The frequency of public transport services within/ in proximity to a settlement.*
  - Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

**Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster (town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

### Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

<b>Principle 1 – Sustainable Transport and Accessibility</b>		
<b>SEWSPG Approach</b>	<b>Monmouthshire Approach</b>	<b>Reasons for Difference</b>
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

#### Objector’s comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

#### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

#### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**3719**

**Miss Jaime Clennell**

## View results

Respondent

472

Anonymous

37:09

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

The area in which you propose to build will destroy the town. The decisions to remove the old market under the guise of reducing traffic congestion was obviously a terrible move with congestion three times what it was. Likewise, the move to build new estates on the old Coopers site and the Mardy has only exacerbated the issue, with zero thought of the impact, let alone the hideous nature of these developments, in which these houses are rammed together in an effort to make as much out of this land as possible, with absolutely no regard for the beautiful area. Having visited the Cotswolds recently (a protected area), the developers have been forced to keep new housing in line with the other houses in the area, an aspect that [REDACTED] the council with decisions already made. One wonders how much council tax these new properties will generate for the council?! [REDACTED] This development is coming from people that are pushing a green agenda. We are being forced to accept paying a fortune for our council tax and yet you cant collect more than two black bags a fortnight! And yet, you are more than happy to build on our green fields. Why not build on the old turkey factory... probably because Tesco or Asda are lined up for that spot.

[REDACTED]

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

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

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

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

\*

The area in which you propose to build will destroy the town. The decisions to remove the old market under the guise of reducing traffic congestion was obviously a terrible move with congestion three times what it was. Likewise, the move to build new estates on the old Coopers site and the Mardy has only exacerbated the issue, with zero thought of the impact, let alone the hideous nature of these developments, in which these houses are rammed together in an effort to make as much out of this land as possible, with absolutely no regard for the beautiful area. Having visited the Cotswolds recently (a protected area), the developers have been forced to keep new housing in line with the other houses in the area, an aspect that [REDACTED] the council with decisions already made. One wonders how much council tax these new properties will generate for the council?! [REDACTED] This development is coming from people that are pushing a green agenda. We are being forced to accept paying a fortune for our council tax and yet you cant collect more than two black bags a fortnight! And yet, you are more than happy to build on our green fields. Why not build on the old turkey factory... probably because Tesco or Asda are lined up for that spot.

[REDACTED]

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

14. Would you like to comment on this question \*

Yes

No

15. Is your representation in support or objection? \*

Support

Objection

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

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

\*

The area in which you propose to build will destroy the town. The decisions to remove the old market under the guise of reducing traffic congestion was obviously a terrible move with congestion three times what it was. Likewise, the move to build new estates on the old Coopers site and the Mardy has only exacerbated the issue, with zero thought of the impact, let alone the hideous nature of these developments, in which these houses are rammed together in an effort to make as much out of this land as possible, with absolutely no regard for the beautiful area. Having visited the Cotswolds recently (a protected area), the developers have been forced to keep new housing in line with the other houses in the area, an aspect that [REDACTED] the council with decisions already made. One wonders how much council tax these new properties will generate for the council?! [REDACTED] This development is coming from people that are pushing a green agenda. We are being forced to accept paying a fortune for our council tax and yet you cant collect more than two black bags a fortnight! And yet, you are more than happy to build on our green fields. Why not build on the old turkey factory... probably because Tesco or Asda are lined up for that spot.

[REDACTED]

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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

20. Would you like to comment on this question \*

Yes

No

21. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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[REDACTED]

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

23. Would you like to comment on this question \*

Yes

No

24. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

28. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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[REDACTED]

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

30. Would you like to comment on this question \*

Yes

No

31. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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[REDACTED]

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

33. Would you like to comment on this question \*

Yes

No

34. Is your representation in support or objection? \*

Support

Objection

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

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

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[REDACTED]

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

36. Would you like to comment on this question \*

Yes

No

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

37. Would you like to comment on this question \*

Yes

No

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

38. Would you like to comment on this question \*

Yes

No

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

39. Would you like to comment on this question \*

Yes

No

40. Is your representation in support or objection? \*

Support

Objection

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

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

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[REDACTED]

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

42. Would you like to comment on this question \*

Yes

No

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

43. Would you like to comment on this question \*

Yes

No

44. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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

46. Would you like to comment on this question \*

Yes

No

47. Is your representation in support or objection? \*

Support

Objection

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

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

\*

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[REDACTED]

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

49. Would you like to comment on this question \*

Yes

No

## **Part 3: Tests of Soundness**

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

50. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

The area in which you propose to build will destroy the town. The decisions to remove the old market under the guise of reducing traffic congestion was obviously a terrible move with congestion three times what it was. Likewise, the move to build new estates on the old Coopers site and the Mardy has only exacerbated the issue, with zero thought of the impact, let alone the hideous nature of these developments, in which these houses are rammed together in an effort to make as much out of this land as possible, with absolutely no regard for the beautiful area. Having visited the Cotswolds recently (a protected area), the developers have been forced to keep new housing in line with the other houses in the area, an aspect that [REDACTED] the council with decisions already made. One wonders how much council tax these new properties will generate for the council? [REDACTED] This development is coming from people that are pushing a green agenda. We are being forced to accept paying a fortune for our council tax and yet you cant collect more than two black bags a fortnight! And yet, you are more than happy to build on our green fields. Why not build on the old turkey factory... probably because Tesco or Asda are lined up for that spot.

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## Part 4: Appearance at Examination Hearing Sessions

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

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

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

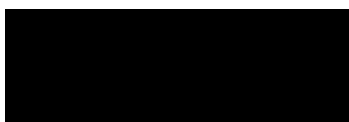
Yes

No

## Part 5: Welsh Language

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

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



**3720**

**Megan Batchelor**

**Archived:** 08 March 2025 14:53:51

**From:** [REDACTED]

**Mail received time:** Mon, 16 Dec 2024 16:44:33

**Sent:** Mon, 16 Dec 2024 16:42:25

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

**Subject:** Objection to Planning CS0232

**Importance:** Normal

**Sensitivity:** None

**Attachments:**  
[REDACTED]

---

Hi,

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. Its houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

[REDACTED] It is quintessential country side, full of natural beauty and a quiet way of life. This number of additional houses will impose on the natural beauty of this village and put a strain on the already over capacity roads.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

Regards

[REDACTED]

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## **Welsh Government Planning Policy**

### **Planning Policy Wales (Edition 12) February 2024**

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: *Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.*

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*• Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
  - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
---	----------

4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population’s daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government’s commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

**Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster (town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

## Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

Principle 1 – Sustainable Transport and Accessibility		
SEWSPG Approach	Monmouthshire Approach	Reasons for Difference
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

### Objector's comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**3721**

**Melissa Sugrue**

**From:** [REDACTED]  
**Mail received time:** Mon, 16 Dec 2024 21:26:27  
**Sent:** Mon, 16 Dec 2024 21:26:13  
**To:** [MCC - PlanningPolicy](#)  
**Subject:** Objection to Planning on Crick, Caldicot  
**Importance:** Normal  
**Sensitivity:** None  
**Archived:** 10 February 2025 10:26:27

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Good evening,

I am writing to put my objections and raise my concerns to Monmouthshire County Council over their Monmouthshire Replacement Local Development Plan, policy.

I recently moved to Crick, Caldicot with my young family. The area has been idyllic and we've settled in very well but have recently become aware of the plans for a secondary gypsy and traveller site to be located in Crick (despite the majority of representatives voting against this!) as well as the plan to develop 700 homes in the nearby land, namely the David Broom equestrian centre as well as the ex MOD land in Caerwent.

My objections are as follows:

1. Flooding - with the very heavy and persistent rain throughout 2023/2024, we have seen severe flooding to the fields adjacent to Crick Road as well as the Neddern Brooke threatening to overflow which runs close to my home. Developing greenfield will only continue to exasperate the flooding issue, leading to more localised flooding to the properties in Crick as well as on the A48.
2. Infrastructure - how do the council propose to support the already overloaded doctors surgeries, schools, dentists, transport systems etc. Upon moving to Crick, I wasn't able to put my two children into the same school due to the schools being at capacity and two car journeys were the only options to ensure our children were able to get to school on time, causing pollution and additional road traffic on insufficient roads (potholes, as well as single track roads). How do you propose to accommodate 700 more cars (if only one car per household although I expect this will be higher), 1400 children (assuming two children per house), almost 3000 more people - doctors, dentists etc. We also had issues with NHS dentists and have had to register with a private dental practice in Newport as a family.
3. Environmental Damage - air quality is already impacted, how will this be improved? If anything with the extra cars, buses, delivery people, developers etc. this will cause far greater damage to our environment, damage that will take years, if at all, to be improved. This is without taking into consideration the loss of green fields, and contributing to localised flooding as well as noise pollution.

I urge MCC to listen to the public and hear our objections and concerns. We have considerable and very valid concerns and want our local representatives to defend our case instead of ploughing ahead with much contested decisions to ensure targets are met and funding is provided.

Regards,  
[REDACTED]

planningpolicy@monmouthshire.gov.uk



**3722**

**Mr James**

## View results

Respondent

127

Anonymous

21:19

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

### Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land adjacent to Rockfield estate - I have serious concerns about the addition of more homes to the Rockfield estate. There is already a lack of infrastructure for the existing homes, with only one shop (co-op), within walking distance. These new homes will be on the outer edge of walking distance to local amenities and will likely result in more use of vehicles commuting to a limited car park. In addition, Monmouth town itself has poor accessibility, a falling job market, and a lack of community activities for its existing residents.

I understand that the Welsh government has put demands on the local authority to build more homes. However, Monmouth is in danger of over-populating for the sake of hitting targets. From what I understand, the local council has also faced some financial challenges, these will simply be multiplied by adding more homes.

The outdated Wye bridge, increased closure of high street shops, frequent restrictions on the dual carriageway, and closure of local businesses, are all issues that need addressing before the town dances to the Welsh Government's tune of build, build, build. In the long term it will be the town residents, both new and existing, that suffer.

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

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land adjacent to Rockfield estate - I have serious concerns about the addition of more homes to the Rockfield estate. There is already a lack of infrastructure for the existing homes, with only one shop (co-op), within walking distance. These new homes will be on the outer edge of walking distance to local amenities and will likely result in more use of vehicles commuting to a limited car park. In addition, Monmouth town itself has poor accessibility, a falling job market, and a lack of community activities for its existing residents.

I understand that the Welsh government has put demands on the local authority to build more homes. However, Monmouth is in danger of over-populating for the sake of hitting targets. From what I understand, the local council has also faced some financial challenges, these will simply be multiplied by adding more homes.

The outdated Wye bridge, increased closure of high street shops, frequent restrictions on the dual carriageway, and closure of local businesses, are all issues that need addressing before the town dances to the Welsh Government's tune of build, build, build. In the long term it will be the town residents, both new and existing, that suffer.

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

14. Would you like to comment on this question \*

Yes

No

15. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land adjacent to Rockfield estate - As previously mentioned, there are very limited resources for the estate as it currently stands. More homes will compound the issues for residents. New residents will be forced to use the cars as they are out of walking distance (for most people). This directly goes against the council's climate change agenda.

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Adding homes further from the town centre will increase, traffic, congestion and put higher demands on vehicle use. The lack of planning for businesses within the town will mean that new residents will have to travel more. A focus on the access routes to Monmouth should be implemented prior to more homes.

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

26. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Please see previous comments:

Land adjacent to Rockfield estate - I have serious concerns about the addition of more homes to the Rockfield estate. There is already a lack of infrastructure for the existing homes, with only one shop (co-op), within walking distance. These new homes will be on the outer edge of walking distance to local amenities and will likely result in more use of vehicles commuting to a limited car park. In addition, Monmouth town itself has poor accessibility, a falling job market, and a lack of community activities for its existing residents.

I understand that the Welsh government has put demands on the local authority to build more homes. However, Monmouth is in danger of over-populating for the sake of hitting targets. From what I understand, the local council has also faced some financial challenges, these will simply be multiplied by adding more homes.

The outdated Wye bridge, increased closure of high street shops, frequent restrictions on the dual carriageway, and closure of local businesses, are all issues that need addressing before the town dances to the Welsh Government's tune of build, build, build. In the long term it will be the town residents, both new and existing, that suffer.

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

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

30. Would you like to comment on this question \*

Yes

No

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

31. Would you like to comment on this question \*

Yes

No

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

32. Would you like to comment on this question \*

Yes

No

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

33. Would you like to comment on this question \*

Yes

No

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

34. Would you like to comment on this question \*

Yes

No

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

35. Would you like to comment on this question \*

- Yes
- No

### Part 3: Tests of Soundness

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

36. Do you consider that the Plan is sound? \*

- Yes
- No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

See previous comments.

### Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

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

Welsh

English

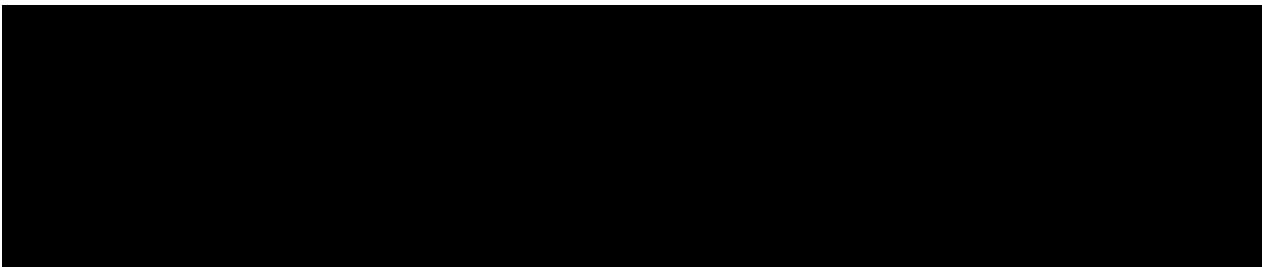
## Part 5: Welsh Language

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

N/A

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

N/A



**3723**

**Mr James Breakey**

## View results

Respondent

376

Anonymous

04:42

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

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

9. Would you like to comment on this question \*

Yes

No

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

10. Would you like to comment on this question \*

Yes

No

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Firs Road and the surrounding streets are situated on steep hills, and the proposed site would overlook them entirely due to its elevated position, compromising the privacy of existing homes. Additionally, many of the roads leading to and from the area are narrow country lanes that are already heavily trafficked. Adding 100 houses would exacerbate congestion, creating hazardous conditions, particularly for children. Furthermore, the Penlanlas Farm site poses several other significant issues, including unmanageable groundwater runoff that could affect the homes below and a detrimental impact on local wildlife.

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

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

28. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

Undeliverable

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

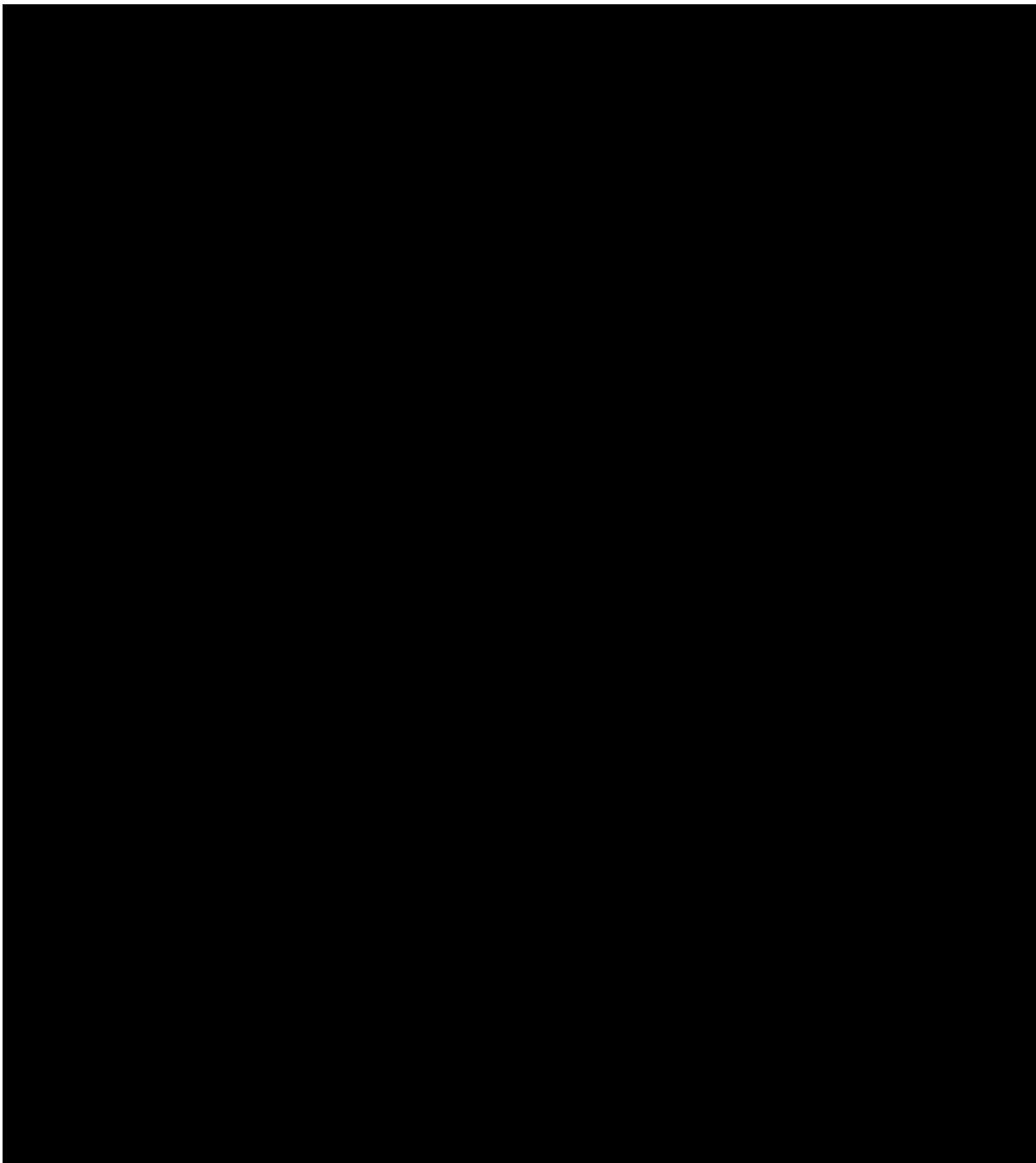
Yes

No

## Part 5: Welsh Language

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

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



**3724**

**Mr James Cameron**

## View results

Respondent

94

Anonymous

21:09

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

### Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

14. Would you like to comment on this question \*

Yes

No

15. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

20. Would you like to comment on this question \*

Yes

No

21. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

23. Would you like to comment on this question \*

Yes

No

24. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounon Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

26. Would you like to comment on this question \*

Yes

No

27. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounon Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

29. Would you like to comment on this question \*

Yes

No

30. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounon Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

32. Would you like to comment on this question \*

Yes

No

33. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounon Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

35. Would you like to comment on this question \*

Yes

No

36. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

38. Would you like to comment on this question \*

Yes

No

39. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

41. Would you like to comment on this question \*

Yes

No

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

42. Would you like to comment on this question \*

Yes

No

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

43. Would you like to comment on this question \*

Yes

No

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

44. Would you like to comment on this question \*

Yes

No

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

45. Would you like to comment on this question \*

Yes

No

46. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

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

48. Would you like to comment on this question \*

Yes

No

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

49. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

50. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

Land at Mounton Road - building in this location is will increase congestion on roads that are already heavily congested. Chepstow's infrastructure cannot support more homes, the current council cannot perform its job to an acceptable standard with the level of homes they exist now, more homes will mean a more diluted level of performance.

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

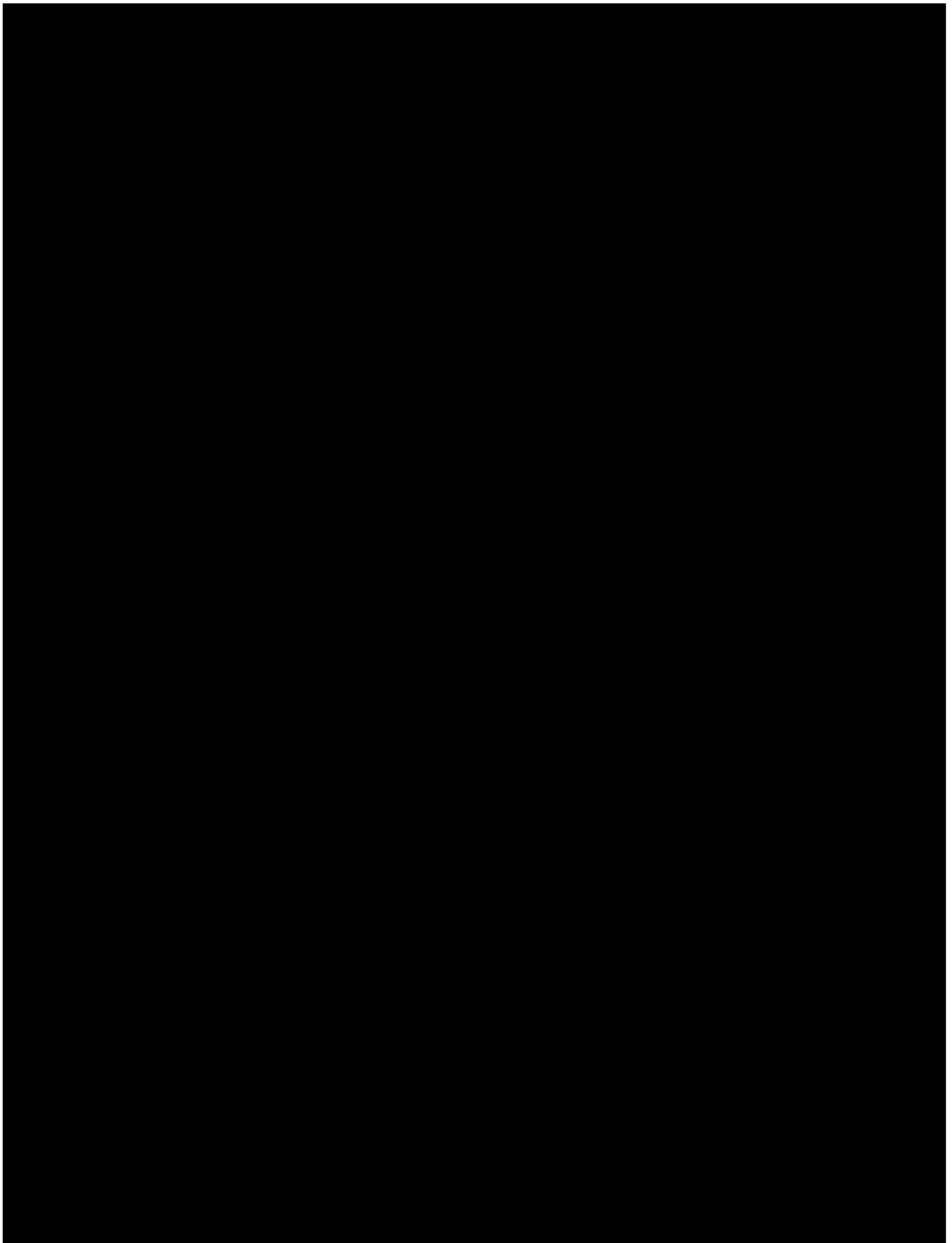
## Part 5: Welsh Language

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

Another waste of valuable resources, very few people speak Welsh. More than half of the counties residents come from outside wales

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

Why do we need this, learning Welsh is a choice, it shouldn't be enforced to accommodate an outdated agenda



**3725**

**Mr James Coxwell**

## View results

Respondent

282

Anonymous

28:12

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

We don't object to the plan in principle, but are concerned about the lack of infrastructure proposals. In particular, we feel that sufficient account has not been taken of the concomitant increase in traffic volume on the surrounding roads.

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

We have not been given access to the infrastructure policy. We went to our local consultation meeting but this was not available. We believe it is a vital element of the plan.

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

30. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Reiterate my request for information about the local infrastructure plan for Chepstow, so that I can be fully informed.

### Part 3: Tests of Soundness

Please refer to the notes at the for further

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

32. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

No infrastructure plan available to us.

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

## Part 5: Welsh Language

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

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

Ensure adequate signage throughout in Welsh.

**3726**

**Pastor Michael Mortimer**

**Archived:** 09 February 2025 12:35:31

**From:** [REDACTED]

**Sent:** Tue, 17 Dec 2024 18:50:27

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

**Subject:** RLDPConsultation ResponseSite HA4

**Importance:** Normal

**Sensitivity:** None

---

This is prime agricultural land - used in spring by pregnant ewes and the rest of the year by beef fatstock.

Yes we need more houses but we also need food. Build elsewhere.

[REDACTED]

**3727**

**Mr James Hailwood**

## View results

Respondent

406

Anonymous

18:57

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I am completely opposed to this development. I have been a resident [REDACTED] and I have seen my small market town turn into a congested and polluted suburb. I clearly remember any traffic queue in this once delightful town numbered no more than a few vehicles and that was only during peak hours. Now, large queues of traffic greet you at every junction, nomatter the time of day. At its worst, it can take 20 minutes to travel from Sedbury to Bulwark.

Highbeech roundabout is no exception. The opening of several businesses by the petrol station has not helped the matter as there is no room for a filter lane to turn right, resulting a long delays from all five exits. Add in the vast house building in Lydney and things will only worsen.

We have been bombarded with new houses over the last 30 years with literally no road infrastructure improvements since 1987 when the A48 bridge was opened.

It is finally time to put a complete stop to any development until the infrastructure is improved.

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I am completely opposed to this development. I have been a resident [REDACTED] and I have seen my small market town turn into a congested and polluted suburb. I clearly remember any traffic queue in this once delightful town numbered no more than a few vehicles and that was only during peak hours. Now, large queues of traffic greet you at every junction, nomatter the time of day. At its worst, it can take 20 minutes to travel from Sedbury to Bulwark.

Highbeech roundabout is no exception. The opening of several businesses by the petrol station has not helped the matter as there is no room for a filter lane to turn right, resulting a long delays from all five exits. Add in the vast house building in Lydney and things will only worsen.

We have been bombarded with new houses over the last 30 years with literally no road infrastructure improvements since 1987 when the A48 bridge was opened.

It is finally time to put a complete stop to any development until the infrastructure is improved.

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

20. Would you like to comment on this question \*

Yes

No

21. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Z

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

23. Would you like to comment on this question \*

Yes

No

24. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Z

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

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

30. Would you like to comment on this question \*

Yes

No

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

31. Would you like to comment on this question \*

Yes

No

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

32. Would you like to comment on this question \*

Yes

No

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

33. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

Stop building houses

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

- Yes
- No

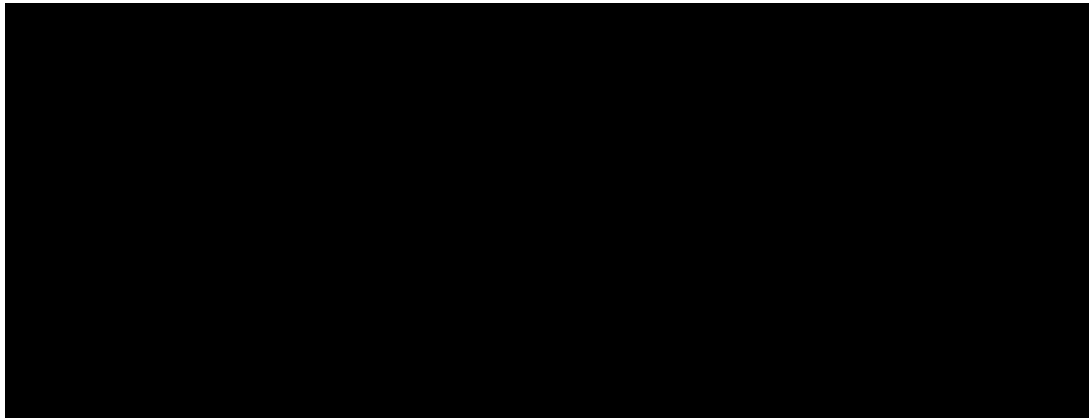
## Part 5: Welsh Language

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

I believe the Welsh language is a waste of time and money. No money should be spent on its promotion.

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

I believe the Welsh language is a waste of time and money. No money should be spent on its promotion.



**3728**

**Michael Perry**

**From:** [REDACTED]

**Mail received time:** Sun, 15 Dec 2024 18:37:44

**Sent:** Sun, 15 Dec 2024 18:35:26

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

**Subject:** RLDP Deposit Plan Consultation CSO2032 - Shirenewton

**Importance:** Normal

**Sensitivity:** None

**Attachments:** [MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON \(003\).docx](#) [REDACTED]

**Archived:** 10 March 2025 10:42:51

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Dear Planning

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

Regards

[REDACTED]

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## **Welsh Government Planning Policy**

### **Planning Policy Wales (Edition 12) February 2024**

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: *Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.*

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*· Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
  - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
---	----------

4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population’s daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government’s commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

#### **Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier

Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynyddbach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### **Self-Containment**

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
--	---------	------	---------	------	---------	------	---------	------

**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3

<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network

Maps as an Active Travel cycle route nor as future route but is mentioned on the website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so. This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster(town) not the residential outskirts of the town which has no facilities or services to show the

distance between the settlements is less than 3 miles. The reasons for the difference in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

### Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

<b>Principle 1 – Sustainable Transport and Accessibility</b>		
<b>SEWSPG Approach</b>	<b>Monmouthshire Approach</b>	<b>Reasons for Difference</b>
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

### Objector’s comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any shops, post office, banks, or even a single café. Therefore, for convenience stores and other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

*Preferred Strategy paragraph 4.32 states 'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs. It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**3729**

**Mr James McDonald**

## View results

Respondent

474

Anonymous

18:30

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I am objecting to the development of Mounton road, for 2 reasons. Traffic congestion and Flooding. As a resident [REDACTED] since 2014, I experience multiple times per day the traffic congestion at highbech roundabout. This is particularly bad at rush hours and school drop off times. This has significantly worsened over the past 10 years. To state this development will have no negative impact on congestion or air quality is

[REDACTED]  
Similarly the worsening of Flooding in Mounton hamlet is noticeably during the past 10 years, with the fields and roads surrounding Mounton Brook being flooded more regularly in recent years. The latest occasion during storm Conall, 26th and 27th November 2024, the round about and road through Mounton were impassible, as was Trap Hill Road, with approximately 60cm of water on the carriageway. The development on significant acerage on Mounton road will only exacerbate the flood risk due to significantly reducing soak and run off area for the increase in extreme weather events as a result of climate change.

My suggestion is to develop areas that have the infrastructure to cope with increased traffic and that are not presently a significant flood risk area.

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Please see original answer in objection to Mounton road

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

See answer 1

## Part 4: Appearance at Examination Hearing Sessions

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

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

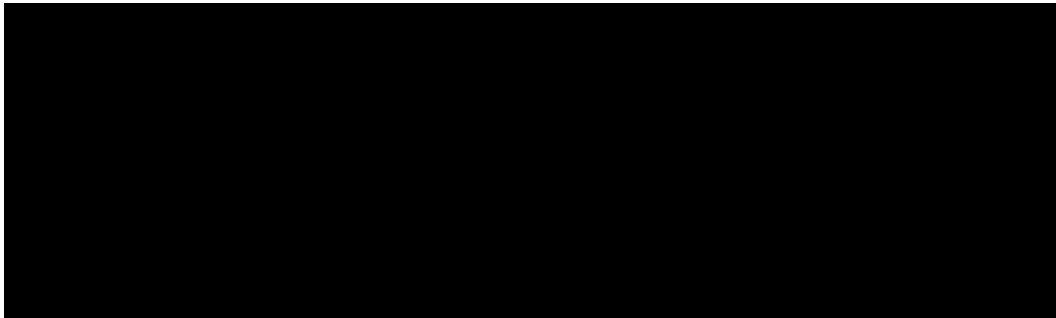
33. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- Yes
- No

## Part 5: Welsh Language

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

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



**3730**

**Michelle Hale**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 December 2024 17:05  
**To:** MCC - PlanningPolicy  
**Subject:** RLDP Deposit Plan Consultation CSO2032 Redd Landes Shirenewton  
**Attachments:** MCC - OBJECTION TO HA17 HOUSING ALLOCATION - SHIRENEWTON.docx

I am writing strongly to object to the Replacement Local Development Plan proposal CS0232 for the construction of a housing development of 26 houses, adjacent to Redd Landes Shirenewton. Shirenewton is a small historic village, set within a designated conservation area. It's houses are stone built, with a beautiful medieval church and rural landscape. It has very narrow lanes, and is surrounded by unspoilt countryside. This would be a very large estate, compared to the size of the village, and would have a severe impact on the infrastructure and environment for the current residents. It would change the character and spoil the heritage of the village for ever.

The fundamental reasons to the objection is that the development is contrary to Monmouthshire County Council's planning policy, on the following points. Please see attached file.

Sent from my iPhone

This representation gives the reasons we consider that the housing allocation HA18 – Land west of Redd Landes, Shirenewton, for 26 dwellings in the Monmouthshire CC (MCC) Draft Deposit Local should be omitted. The basis for the objection is that Shirenewton is not considered a sustainable location for housing growth of this scale. This has been demonstrated in the Council’s evidence-based documents particularly the Sustainable Settlement Appraisal (SSA) which includes Appendix 3 - Settlement Profiles (December 2022). This representation will focus on the methodology and scoring used in the SSA and its Appendix 3 – Settlement Profiles.

## **Welsh Government Planning Policy**

### **Planning Policy Wales (Edition 12) February 2024**

Welsh Government planning policy contained in Planning Policy Wales (12) (PPW12) states in paragraph 4.1.10 *‘The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:*

- ***are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;***
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.*

*Paragraph 4.1.12 of PPW states: ‘It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.*

*Paragraph 4.1.13 states: The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport.*

*Paragraph 4.1.14 states: The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications.*

4.1.15 Careful consideration needs to be given in development plans to the allocation of new sites which are likely to generate significant levels of movement, to ensure that access provisions which enable walking and cycling, as well as for public transport, are included from the outset and that any implications associated with airborne pollution can be addressed.

Paragraph 4.1.17 states: *Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances. For example, a planning authority wishing to grow a rural village, despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling to shops and services in the village centre; then consider whether new development could be located near a bus stop or enable improvements to the bus service; before finally considering the needs of private motor vehicles, including measures to encourage the use of Ultra Low Emission Vehicles.*

### **Public Transport**

4.1.36 The availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car. The planning system should facilitate this by locating development where there is, or can be, good access by public transport. The design, layout, density and mix of uses of a place are also fundamental to sustaining public transport services, and encouraging and enabling people to use them.

4.1.37 Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.

4.1.39 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.

## **TAN 6 - Planning for Sustainable Rural Communities (July 2010)**

In accordance with advice in in TAN 6 MCC has undertaken an audit of rural services and facilities by individual settlement and the consideration of functional linkages within the area has been undertaken to inform the settlement strategy for the RLDP.

## **Local Develop Plan Manual (March 2020)**

In line with the Local Develop Plan Manual MCC has undertaken a Sustainable Settlement Assessment to inform decisions regarding where development should be spatially located to achieve a sustainable pattern of growth, minimise unsustainable patterns regarding the movement of people and support local services and facilities. This assessment is intended to form the basis for the settlement hierarchy, identifying which settlements are most sustainable and have the capacity to deliver growth.

## **MCC LDP Preferred Strategy (December 2022)**

Page 26, paragraph 4.6, 3<sup>rd</sup> bullet point:

*• Focuses growth in the County's most sustainable settlements of Abergavenny, Chepstow and Caldicot, including Severnside, **as well as some growth in our most sustainable rural settlements** to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. Due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.*

## **Objectors comment**

The contention is that Shirenewton is not one of the most sustainable rural settlements in Monmouthshire and in fact it has been shown in MCCs Sustainable Settlement Appraisal to be one of its least sustainable, which is discussed further in this representation.

## **Sustainable Settlement Appraisal & Appendix 3 Settlement Profiles (December 2022)**

A Sustainable Settlement Appraisal (SSA) was produced by MCC which includes Appendix 3 - Settlement Profiles in which the role and function of settlements including Shirenewton is assessed and an audit of existing services and facilities undertaken based on the following 3 principles:

- **Principle 1** – The level of sustainable transport and accessibility in and around settlements
- **Principle 2** – The availability of local facilities and services in and around settlements
- **Principle 3** – The level of employment opportunities in and around settlements

It is understood that Planning Policy officers themselves undertook the assessments of the settlements which included desktop studies and site visits. The desktop studies included existing data such as the location of village halls, doctor's surgeries, post offices, playing fields, public rights of way, active travel routes, bus stops, and employment opportunities to establish a baseline of the facilities and services within the settlements.

Once the baseline was established, where necessary, a settlement was visited and surveyed by Planning Policy officers and the presence of individual services/facilities checked and recorded. The information was quality assured by the individual Town/ Community Councils in which the settlements are located.

Each settlement was then assessed against a scoring system and ranked according to its overall score. This ranking provides an initial quantitative sustainability assessment which is limited to the measurable factors identified. This enables the identification of broad groupings of settlements with similar roles and functions.

We have read and considered the Sustainable Settlement Appraisal which provides both the methodology and the ranking/categorisation of the settlements in Monmouthshire and its Appendix 3 - Settlement Profiles which also scores the elements listed under the 3 Principles. Parts of the text from the SSA and Appendix 3 -Settlement Profiles have been included in this statement to make referencing clearer and our comments easier to understand.

## Scoring System used in the SSA

The following paragraphs: 4.8, 4.9, 4.10 and 4.13 have been directly taken from the SSA (shown in italics) and also Table 1.

*4.8 The scoring system is based upon the three principles.*

*4.9 Principle 1: Sustainable Transport and Accessibility focuses on sustainable transport and accessibility on the basis that its provision reduces the need to travel by car and enables access to a wider range of amenities by sustainable transport modes. Settlements that are well connected via multi-modal forms of transport help increase the propensity for use of sustainable transport options for local residents to access a range of facilities including employment, health care, education and retail. In order to measure Principle 1, the following factors were assessed:*

- *The presence of Active Travel Routes within the Settlement*
- *Walking or cycling distance to a higher order settlement via an active travel route.*
- *The frequency of public transport services within/ in proximity to a settlement.*
  - *Distance to a rail station. The distance is measured from a central address point within a settlement to the nearest rail station via the road network.*
  - *A settlement's proximity to a strategic highway network. There must be a clear link to the network from the settlement. The distance is measured from a central*

**Table 1: Scoring System for Sustainable Transport and Accessibility**

<b>Active Travel</b>	
<b>Presence of Active Travel Routes within the Settlement</b>	
Several Routes	10 points
One Route	5 points
No Routes	0 points
<b>Walking distance to a higher order settlement via active travel route</b>	
1.5 miles	1 point
<b>Cycling distance to a higher order settlement via active travel route</b>	
3.0 miles	1 point
<b>Bus Services</b>	
Bus stop	1 point
'Turn up and go' provision, frequency of approximately every 10 minutes	10 points
Medium frequency of service between 11 -30 minutes.	5 points

Low frequency of service between 31-60 minutes.	3 points
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4.10 It is important that a settlement has good accessibility to services and facilities helping communities to meet many of their everyday needs. Good access to sustainable travel modes provides choice to the user and can reduce reliance on private cars for travel. Access to active travel routes and public transport also tackles an element of social exclusion enabling individuals who cannot drive or afford a car access to essential services and facilities. **The presence of an active travel route within a settlement or between settlements helps to identify scope for meaningful walking and cycle journeys. The matrix scoring for this Principle is weighted accordingly to best capture the most sustainable transport options in the first instance, akin to the sustainable transport hierarchy.** This will indicate which settlements have the opportunity to be more sustainable than others due to their higher level of accessibility. Settlements that score well in this category have great potential to promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to travel.

4.13 In terms of the average distances people are willing to walk or cycle to access everyday services, the Statutory Guidance for the Delivery of the Active Travel (Wales) Act 2013 says in section 2.3.3 that **“The integrated network will only need to stretch as far as people are willing to make journeys. Based on studies of travel patterns and commuting, most people prefer their regular journeys to be less than 45 minutes. This time period equates approximately to up to three miles by foot and ten miles by bicycle, assuming a person of average fitness and depending on factors such as gradient and terrain”.** In terms of the average distances considered within this appraisal these distances are interpreted as the maximum distance a person would be expected to travel.

4.26 The scoring matrices set out above reflect the role sustainable transport/accessibility, employment and key services and facilities play in meeting the resident population's daily needs and the need to reduce travel distances to access services and facilities. Based on this each principle is weighted to reflect their importance to the sustainability of settlements. PPW11 (para 4.1.9) confirms the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development as shown in the diagram below.

4.27 To reflect this commitment to sustainable transport and accessibility the criteria for Principle 1 – Sustainable Transport and Accessibility represents 40% of the overall score with the remaining criteria under Principle 2 and 3 having an overall score of

30% each. Thus, the maximum score that can be achieved for a settlement against the 3 principles is 100%.

### Objector's comments

Paragraphs 4.26 and 4.27 of the SSA (above) recognise the importance of sustainable transport for the residents of settlements and the emphasis on reducing the reliance on cars by weighting Principle 1 – Transport Services at 40% in the scoring system and the other two at 30%. It is considered that if a settlement is scoring so poorly for Principle 1 it is not satisfying the Welsh Government Transport Sustainable Hierarchy (see figure 9 below taken from PPW12) and, therefore should take additional housing growth that will exacerbate the situation further even if it is scoring marginally better in the other Principles.

Figure 9 : The Sustainable Transport Hierarchy for Planning

Figure 9: The Sustainable Transport Hierarchy for Planning



Source: Planning Policy Wales Edition 12 (February 2024)

In Section 7 of the Sustainable Settlement Appraisal (SSA) the Initial Ranking of Settlements based on their Weighted Scores against the 3 Principles is explained. Paragraph 7.1 is directly from the SAA.

*7.1 The settlements have been divided into 6 tiers depending on their weighted score against each of the 3 principles. The tiers have been colour-coded, with tiers 1 and 2 green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 amber as they have a lower level of sustainability and tiers 5 and 6 with the lowest scores and thus the least sustainable, red. The tiers have been arrived at by plotting the individual scores on a graph and then identifying the natural breaks in the data. This way of classifying the data allows for an 'optimal' classification system that identifies data breaks, for a given number of classes, which will minimise within-class variance and maximise between-class differences.*

#### **Objector's comments:**

Table 13 in the SSA (row relating only to Shirenewton included below) lists the settlements including Shirenewton which has been categorised as a Tier 3 (Amber) settlement and described as 'a lower level of sustainability' despite two of the three Principles being categorised as a Tier 5 (Red). The two Principles categorised as Tier 5 (Red) are Transport Services and Accessibility (scored 10) and Employment Opportunity (scored 2.5) and therefore, Shirenewton is very low scoring in terms of these two Principles.

For Principle 2 - Community and facilities, Shirenewton fared better, scoring 8 which gave it a Tier 3 (Amber) category and high enough to push the overall score for Shirenewton up to make it a Tier 3 category. However, even with this principle considering the long list of community services and facilities used in the appraisal, Shirenewton only scores when the generic term 'open space' is divided into types of open space namely: Publicly Accessible Open Space, Sports Ground (pitch available) and Childs Principle which have then been scored individually and therefore contribute separate scores to the overall score.

It also scores for having a place of worship (which can be found in the most remote and non-sustainable villages and hamlets in Wales), whilst Shirenewton scores zero for more relevant community services/facilities in terms of sustainability in a settlement such as a grocery store for goods and (convenience) such as milk and bread or a post office etc. which when absent from a settlement will result in car trips being made to the nearest shops in Chepstow.

It is recognised leisure purposes are the number one trip generator for car use (31%) followed by shopping (19%) and then commuting (15%) (source: National Travel Survey (NTS0409) for England 2021) which is highly likely to be similar for Wales. Therefore, the lack of leisure facilities, shops and employment in Shirenewton would likely result in car trips which would not necessarily be generated in more sustainable settlements such as Raglan which has several convenience stores (Tesco and a butchers) and where most residents of the village could easily walk or cycle to without the need to travel (by mostly car) to nearest shops in Usk, Abergavenny or Monmouth in order to buy milk and bread etc.

It is of note that Shirenewton is the only one in the list of those settlements categorised as Tier 3 settlements to have two of the three Principles categorised as Tier 5 (Red) which includes Transport Services & Accessibility.

Appraisal it is considered one of the least sustainable settlements and ranked as a Tier 5 (Red) settlement for these two Principles. Shirenewton scores better in the appraisal for

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility		Principle 2: Community services & facilities		Principle 3: Employment Opportunity		Total	
	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
Devauden	10	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	<b>10.0</b>	<b>Tier 5</b>	<b>8.0</b>	<b>Tier 3</b>	<b>2.5</b>	<b>Tier 5</b>	<b>21.6</b>	<b>Tier 3</b>
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
.....	..	..	..	..	..	..	..	..

**Green** - Tiers 1 and 2 are the most sustainable in terms of the quantitative appraisal

**Amber** - Tiers 3 and 4 have a lower level of sustainability

**Red** - Tiers 5 and 6 are the least sustainable

### Self-Containment

4.5% of Shirenewton/Mynyddbach residents who are employed work in Shirenewton/Mynyddbach (source: SSA) and therefore the majority of people who are in employment commute by car/bus/motorcycle/bicycle/walk. It assumed that since the bus service to Shirenewton is not a regular one and that the cycle route to the centre of Chepstow and its employment areas (and the train station) is 4.4 miles over physically challenging terrain that the majority of trips by residents for commuting are by private car. It also assumed that an increase in the housing stock of Shirenewton will result in an increased number of its residents commuting by private car.

If the incoming residents don't have access to a car (13 dwellings being affordable) they will find themselves in a village with poor public transport and inadequate and unsafe cycle routes over challenging terrain. With the alternatives to the use of the private car for incoming residents of the new housing allocation (if it progresses) being so limited MCC will need to ensure those who live in Shirenewton either have more regular bus service or have access to a private car, otherwise, their quality of life will be restricted and the sense of isolation in a village without a single shop and other services will become apparent to them.

## Settlement Cluster Analysis

### Cluster Criteria used

- 4.30 *PPW 11 (para 3.40) states that “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision.” There are several criteria which are considered appropriate to identify settlements within the county with the potential to form a cluster:*
- *Identified as a settlement in Strategic Policy S1 of the adopted Local Development Plan;*
  - *The main settlement within the cluster should be a Tier 1 settlement based on the 3 principles and settlement size;*
  - *The cluster should contain Settlements from Tiers 1 to 4.*
  - *Smaller settlements within the cluster should achieve a score of 25% or above based on the 3 principles and settlement size;*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via a bus route into or adjacent to the settlement*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement via an active travel route option, either walking or cycling; and*
  - *Smaller settlements within the cluster should have a functional link with a Tier 1 settlement with regard to its proximity via the road network.*
- 4.31 *Where settlements meet the above criteria and have the ability to form a cluster, these settlements may be considered as locations for new development, despite their position within the settlement hierarchy. Any such development will need to be acceptable in planning terms, however, and balanced against the physical/environmental and infrastructure constraints of individual settlements and their ability to accommodate additional development given the sensitivity of landscapes, the countryside character of rural settlements and existing residential amenity.*

The Sustainable Settlement Appraisal includes a settlement cluster analysis that identifies 3 tier 1 settlements namely Abergavenny, Monmouth and Chepstow that meet the criteria and have the capacity to form a cluster of settlements that recognises the role and function that smaller settlements play within the County that have a geographical and functional link to a tier 1 settlement within that cluster. The smaller settlements within the cluster whilst located within the rural hinterland of a tier 1 settlement and relying on that settlement for many of their day-to-day needs also contribute to that settlement’s social, economic and environmental fabric and could be capable of accommodating some

development despite their position within the settlement hierarchy due to their close links with the tier 1 settlement.

Paragraph 10.5 is from the SAA

*10.5 Cluster 2 centres on the Tier 1 settlement of Chepstow, with three smaller settlements having particularly strong geographical links to it. In contrast to cluster 1 the smaller settlements in Cluster 2 are all lower tier settlements. These settlements whilst undoubtedly having strong geographical links in terms of distance from the Tier 1 settlement of Chepstow do not have as strong transport links and so whilst as a group of settlements having the potential to support some additional future development this will be dependent upon any physical/environmental and infrastructure constraints of the individual settlements and their ability to accommodate additional development given the sensitivity of landscapes and the countryside character of rural settlements.*

**Objector’s comments**

The SSA and Appendix 3 both state Shirenewton is only 2.7 miles from Chepstow on an Active Travel route, and yet it was not selected to be included in the cluster of smaller settlements for the Chepstow Cluster which included St Arvans, Pwllmeryric and Mathern (see Table 13). These 3 settlements are at similar distances from Chepstow as Shirenewton, however, they were chosen for the Chepstow Cluster for performing better than Shirenewton in relation to Principle 1 – Transport services and Principle 3 - Employment Opportunities.

It is Principle 2 - Community Services where Shirenewton scores the higher than the other 3 settlements which is due in the main to it having a primary school and its good open space facilities. Shirenewton was, however, not considered to have a strong enough functional link with Chepstow to be part of its Cluster. Only St Arvans from the 3 smaller settlements chosen for the Chepstow Cluster has been allocated housing. It is understood that the main point of the cluster exercise is to identify smaller settlements that have strong links with the Tier 1 settlement for them to receive a certain amount of housing growth, Pwllmeryric and Mathern did not but Shirenewton did, which is questionable.

**Table 13: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles**

Settlement	Principle 1: Transport Services & Accessibility	Principle 2: Community services & facilities	Principle 3: Employment Opportunity	Total
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	Score %	Tier	Score %	Tier	Score %	Tier	Score %	Tier
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**Tier 1 – left out – not relevant**

**Tier 2 - left out – not relevant**

**Tier 3**

Crick	17.8	Tier 3	3.1	Tier 5	10.0	Tier 2	30.9	Tier 3
Portskewett	16.7	Tier 3	8.7	Tier 3	5.0	Tier 4	30.4	Tier 3
Cuckoo's Row	17.8	Tier 3	2.5	Tier 6	10.0	Tier 2	30.3	Tier 3
Llanover	15.6	Tier 3	4.7	Tier 4	10.0	Tier 2	30.3	Tier 3
<b>St Arvans</b>	16.7	Tier 3	6.5	Tier 4	5.0	Tier 4	28.2	Tier 3
Tintern	11.1	Tier 4	9.6	Tier 3	7.5	Tier 3	28.2	Tier 3
The Bryn	14.4	Tier 4	3.7	Tier 5	10.0	Tier 2	28.1	Tier 3
Little Mill	16.7	Tier 3	5.2	Tier 4	5.0	Tier 4	27.9	Tier 3
Llanellen	16.7	Tier 3	5.3	Tier 4	5.0	Tier 4	27.0	Tier 3
<b>Pwllmeyric</b>	17.8	Tier 3	4.0	Tier 5	5.0	Tier 4	26.8	Tier 3
Penpergwm	14.4	Tier 4	2.2	Tier 6	10.0	Tier 2	26.6	Tier 3
<b>Mathern</b>	13.3	Tier 4	7.7	Tier 4	5.0	Tier 4	26.0	Tier 3
Sudbrook	14.4	Tier 4	4.7	Tier 4	5.0	Tier 4	24.1	Tier 3
Devauden	10.0	Tier 5	5.9	Tier 4	7.5	Tier 3	23.4	Tier 3
<b>Shirenewton/Mynydd bach</b>	10.0	Tier 5	8.0	Tier 3	2.5	Tier 5	21.6	Tier 3
Llanvair Discoed	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3
Llanvapley	12.2	Tier 4	4.0	Tier 5	5.0	Tier 4	21.2	Tier 3

**Tier 4 – left out – not relevant**

### SSA - Appendix 3 - Settlement Profiles

Under Principle 1 – Sustainable Transport and Accessibility the scores given under some of the key elements for Shirenewton are disputed.

The criterion (1c)- Cycling distance to a higher order settlement via active travel route.

The settlement profile for Shirenewton states that it is located on a National Cycle Network Route (No.42) which is NOT identified on the MCC Active Travel Network Maps as an Active Travel cycle route nor as future route but is mentioned on the

website as 'Other (long term connection)'. Route No. 42 is a long-distance cycling route which is part of the National Cycle Route and uses mostly roads and is therefore not dedicated solely for cyclists or walkers and as such the routes cross challenging hilly terrain which are not conducive as Active Travel routes for commuting cyclists.

The road safety charity 'Brake' claims that the annual road accident statistics from the Department of Transport routinely show that rural roads are the most dangerous for road users in terms of fatalities (over half of road fatalities are on them) due to their narrowness, poor road surfaces, blind corners and largely unregulated speeds of vehicles. The identified cycle route (National Cycle Network Route 42) from Shirenewton to Chepstow is an unlit, single track (with very few passing points), poorly surfaced country lane with numerous blind corners passing through challenging hilly terrain.

Route 42 is identified like many other routes for regular (seasoned) cyclists by the people responsible for the National Cycle Network and not for someone who doesn't have access to a car, who needs to get to work or to shops/ services and cannot wait for the next bus in two hours who's only alternative is then to get on a bike. It's unrealistic to expect future residents of Shirenewton to do so.

This is maybe the reason why the route has not been identified on the MCC Active Travel Network Maps as an existing nor future Active Travel cycle route.

In the profile for Shirenewton the table showing the scoring of the 3 Principles including Transport Services states the distance along the National Cycle Network Route 42 from Shirenewton to Chepstow is 2.7 miles. Under this criterion in order to score the maximum score of 1 the distance needs to be below 3 miles commuting distance on a bicycle along an Active Travel cycle route. However, MCC has measured the distance from Shirenewton to the nearest boundary edge of Chepstow, namely the residential area of Hazelton Villas which is 2.7 miles. However, if the purpose is for cyclists from Shirenewton is to commute to employment places, the railway station and shops located in the centre of Chepstow rather than a residential area on the outskirts then they have another 1.7 miles to cycle which means they will have cycled 4.4 miles in total along a very narrow single track country lane which has numerous steep hills along the way.

In the Sustainable Settlement Appraisal Appendix 1 – Differences between SEWSPG Methodology and Monmouthshire Approach it states that '*Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m' (3 miles)*. This suggests that the 3 mile rule applies to the facilities and services of the cluster (town) not the residential outskirts of the town which has no facilities or services to show the distance between the settlements is less than 3 miles. The reasons for the difference

in the third column of Table also suggests the cycling distance measured should be from the settlement/population to the services/facilities and not to a residential area (Hazelton Villas) 1.4 miles from the town centre.

### Appendix 1: Differences between proposed SEWSPG Methodology and Monmouthshire Approach

<b>Principle 1 – Sustainable Transport and Accessibility</b>		
<b>SEWSPG Approach</b>	<b>Monmouthshire Approach</b>	<b>Reasons for Difference</b>
Cycling is scored depending on the distance to the largest cluster of facilities and services. The distances vary from less than 1000m to greater than 5000m (3 miles)	Cycling is scored depending on the distance to a higher order settlement via an active travel route. To receive a score this distance should be less than 3.0 miles.	The SEWSPG approach is more suited to an urban area where there would be smaller distances from areas of population to services/facilities. A longer distance has been used for the Monmouthshire methodology to take account of smaller settlements which are within cycling distance of a larger settlement.

Source: SSA (2022)

### Objector’s comments

It is recommended that the distance in the Settlement Profile for Shirenewton is changed from 2.7 miles to the more genuine distance for the purposes of measuring sustainability of 4.4 miles between Shirenewton and the shops and services etc. found only in the centre of Chepstow. Also, the scoring needs to be changed to accurately reflect this from 1 to 0 in Appendix 1 - Settlement Profile for Shirenewton.

### Buses

It has been recognised in the Sustainability Settlement Appraisal that the bus service to Shirenewton is not a regular one (5 a day but none in the evening) and has correctly received a low score as a result.

### Principle 2 – Community Services and facilities/Presence of Retail Centre within or near settlement

The Sustainable Settlement Appraisal shows that Shirenewton does not have any any shops, post office, banks, or even a single café. Therefore, for convenience stores and

other non-food shops etc. its residents need to travel to other town centres in the area. The Appraisal recognises Chepstow with its shops and services/facilities is approximately 5 miles away and is given a score as a result.

It is also recognised in the Appraisal that Shirenewton also lacks a pharmacy, GP surgery, dentist, hospital and therefore no score.

Shirenewton scores points in the Appraisal having a primary school, place of worship, public halls, public houses, sports ground, child's play area etc.

### **Principle 3 – Employment opportunities**

Shirenewton is a village that is predominantly residential and has no shops and no significant employment uses, consequently, it does not score under this Principle except for its proximity to Chepstow and its employment opportunities.

Preferred Strategy paragraph 4.32 states *'To encourage the promotion of sustainable communities where residents can live and work in the same area, housing growth will be accompanied by a commensurate amount of employment land. The proportion of employment growth to be accommodated in the settlement tiers will be set out in the Deposit RLDP.'*

No commensurate amount of employment land has been allocated in Shirenewton.

Shirenewton scores poorly under the overall scoring system of the Sustainable Settlement Appraisal, with only 41 points out of a possible 193 points.

In relation to what paragraph 4.10 of the Sustainable settlement Appraisal says it is considered that Shirenewton does not have good accessibility to services and facilities helping communities to meet many of their everyday needs.

It does not have good access to sustainable travel modes to provide choice to the user and can reduce reliance on private cars for travel. Existing residents and future will not have access to active travel routes and public transport that would tackle an element of social exclusion enabling individuals who cannot drive or afford a car to access essential services and facilities.

## **Transport Hierarchy and Conclusions**

The allocation of housing in Shirenewton fails the Welsh Government Transport Hierarchy test as it doesn't have a regular bus service and has no safe cycling route over a reasonable cycling distance (4.4 miles not as stated 2.7 miles) for commuters to use and the result will be incoming residents including those in affordable housing having to rely on using cars with no modal shift possible as a result.

As highlighted in the SSA and its Appendix 3 – Settlement Profiles with no shops and no employment opportunities (and none planned in the LDP) Shirenewton will remain as a settlement with low sustainability scores, and it therefore should not be a location for further housing growth unless these aspects are remedied.

It is not apparent in the Local Housing Market Assessment Refresh 2022-2037 that there is no identified need for affordable housing in Shirenewton, if there is not, it is a village in a relatively isolated location if residents were not to have access to a car. Therefore, it is questionable if Shirenewton is an appropriate settlement to locate affordable housing considering there are no shops or employment opportunities.

It has been made apparent from the SSA that having access to a car is an essential requirement for residents to live in Shirenewton. It is considered in the SSA Shirenewton to be one of the least sustainable places to live in Monmouthshire in terms of transport services and accessibility and identified as a Tier 5 settlement for sustainable transport and employment opportunities.

We object to the allocation HA17 in the Deposit LDP and request it is omitted from the LDP because it has been demonstrated in the MCCs evidence to be one of the least sustainable settlements in Monmouthshire in terms of transport services and accessibility, having not a single shop nor employment opportunities.

## **Other comments on the suitability of the housing allocation HA18 in Shirenewton**

### **Heritage**

The site has been assessed by Glamorgan Gwent Archaeological Trust Ltd as RED on the HER (Historic Environment Record), indicating extensive prehistoric artefacts in the field and surrounding areas. This factor did not lead it to being rejected by MCC from progressing further into the LDP process as a housing allocation.

However, the site on the opposite side of the road to this housing allocation (HA18) was submitted as a candidate site (ref.no. CS0231) and is adjacent to the Recreation Ground. It was also assessed as a RED by Glamorgan Gwent Archaeological Trust Ltd on the HER (Historic Environment Record), and for this reason alone was rejected by MCC to progress having very similar characteristics in terms of topography (level), being agricultural land, proposed access arrangements, landscape and visual impact etc.

It is an obvious question and a possible discrepancy in the site selection process why one candidate site is rejected for the reason provided which is also shared by a site that has progressed to a housing allocation in the draft deposit LDP, without any mention of it in the candidate site assessment for the latter. There should be consistency in decision-making on why sites are rejected, and others progress when they share the same significant issue(s).

**3731**

**Mr James Spreckley MRICS**

## View results

Respondent

382

Anonymous

58:51

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

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

9. Would you like to comment on this question \*

Yes

No

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

10. Would you like to comment on this question \*

Yes

No

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

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

\*

OBJECTION to Policy HA4 - Land at Leasbrook, Monmouth

The Council's own Candidate Sites Assessment Report 2024 recognises that the Land at Leasbrook has significant constraints, namely:-

1. The site access floods, necessitating an 'emergency' access fallback.
2. It has high/medium landscape sensitivity.
3. It is in close proximity to two Special Areas of Conservation.
4. It is partly within the Lower Wye Valley Landscape of Historic Interest.
5. It affects the setting of the nearby Wye Valley National Landscape (formerly AONB)
6. It lies in an extremely prominent position at the gateway to Wales and Monmouth.

The Council also recognises that the Candidate Sites Assessment Report 2024 (the Report) contains fundamental errors that prevented the further consideration of a more suitable alternative site, namely site CS0099 Land at Drybridge Farm. The Report erroneously states

'Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy considerations.'

The Council has admitted that this is an error, as detailed financial analysis of the site was submitted to demonstrate its deliverability and viability. Nonetheless the site was not progressed due to this error.

CS0099 LAND AT DRYBRIDGE FARM

This site is a sustainably located edge of settlement site, in close proximity to Monmouth Town Centre, health care, schools and leisure centre all within 15 minutes walking distance, and is very accessible via existing footways and active travel links.

This site does not flood, it is not in close proximity to two Special Areas of Conservation, it is not partly within the Lower Wye Valley Landscape of Historic Interest, it does not affect the setting of the nearby Wye Valley National Landscape (formerly AONB), and it does not lie in an extremely prominent position at the gateway to Wales and Monmouth, contrary to the Leasbrook site.

PROPOSED CHANGE

Site CS0099 Land at Drybridge Farm should be allocated for 270 homes, in place of the current flawed allocation at Leasbrook.

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

28. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

The Candidate Sites Assessment Report 2024 is fundamentally flawed, for the reasons given in our response to Question 19 above, and given that the preferred Leasbrook site is relied upon in the Deposit Plan to deliver the required housing growth in Monmouth, the process does not pass the relevant tests with regard to full public consultation of an emerging LDP.

Furthermore, in contrast to the competing housing allocation sites in Chepstow, no qualitative analysis of the three competing housing allocation sites in Monmouth has been published or consulted upon.

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

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

Welsh

English

## Part 5: Welsh Language

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

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



**3732**

**Mr Jamie Sage**

## View results

Respondent

599

Anonymous

31:10

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Your overall plan is detailed but full of bland statements about exemplar housing, active travel, public transport, jobs etc etc. This questionnaire is simply too detailed for a layman to be able to spend the time commenting about every single paragraph or policy. But the plan is then really short on believable detail overall. The plan is obsessed about a number of things that then seem to drive policy to the exclusion of all else - climate change, net zero, active travel etc. Ultimately, where and what are these new jobs going to be, or are we all going to commute? Where are the new Drs and dentists? Why propose building on flood plains when we cannot even manage the current flooding? What is affordable housing and what is the point if minimal jobs locally and really no practical public transport? Active travel is a great cry, but when it cannot meet your needs, distance is too great, family, weather etc etc it simply is an abject waste of money. I cycle everywhere I can but there really is a finite limit and after that a car is the only answer to a continued and fulfilling existence.

I haven't answered any of the following questions as they are simply too detailed and time consuming and arguably repetitive - my overall sentiments are above. The RDLP needs to be realistic about Monmouthshire rather than following the WA dogma.

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

16. Is your representation in support or objection? \*

Support

Objection

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

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

\*

We need to become more realistic about climate change and what we can actually do about it. It is happening, better to have policies that mitigate its effects rather than think we alone in Wales, or UK, can actually do anything about it!

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Little actual evidence of how any improvements in infrastructure are going to happen. For example, if we all have heat pumps and EVs, how can the national grid supply the power to every household?

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

24. Is your representation in support or objection? \*

Support

Objection

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

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

\*

You have to build house where there are jobs, schools, Drs etc or people will simply have to travel - by car.

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

30. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I simply see no evidence of any real, practical improvements being proposed in public transport save for bland statements.

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

32. Would you like to comment on this question \*

Yes

No

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

33. Would you like to comment on this question \*

Yes

No

34. Is your representation in support or objection? \*

Support

Objection

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

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

\*

No evidence actually of any improvements in our infrastructure.

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

36. Would you like to comment on this question \*

Yes

No

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

37. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

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

38. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

I do not believe it will deliver - no previous plan has!

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

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

Welsh

English

## Part 5: Welsh Language

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

Currently I think Welsh is favoured more than English. Witness M4 road alerts in Welsh only. This is a real safety issue and boarding on criminal irresponsibility! I fully respect those who want to promote Welsh and use it but you have to be mindful that a very small proportion of the country actually understands it.

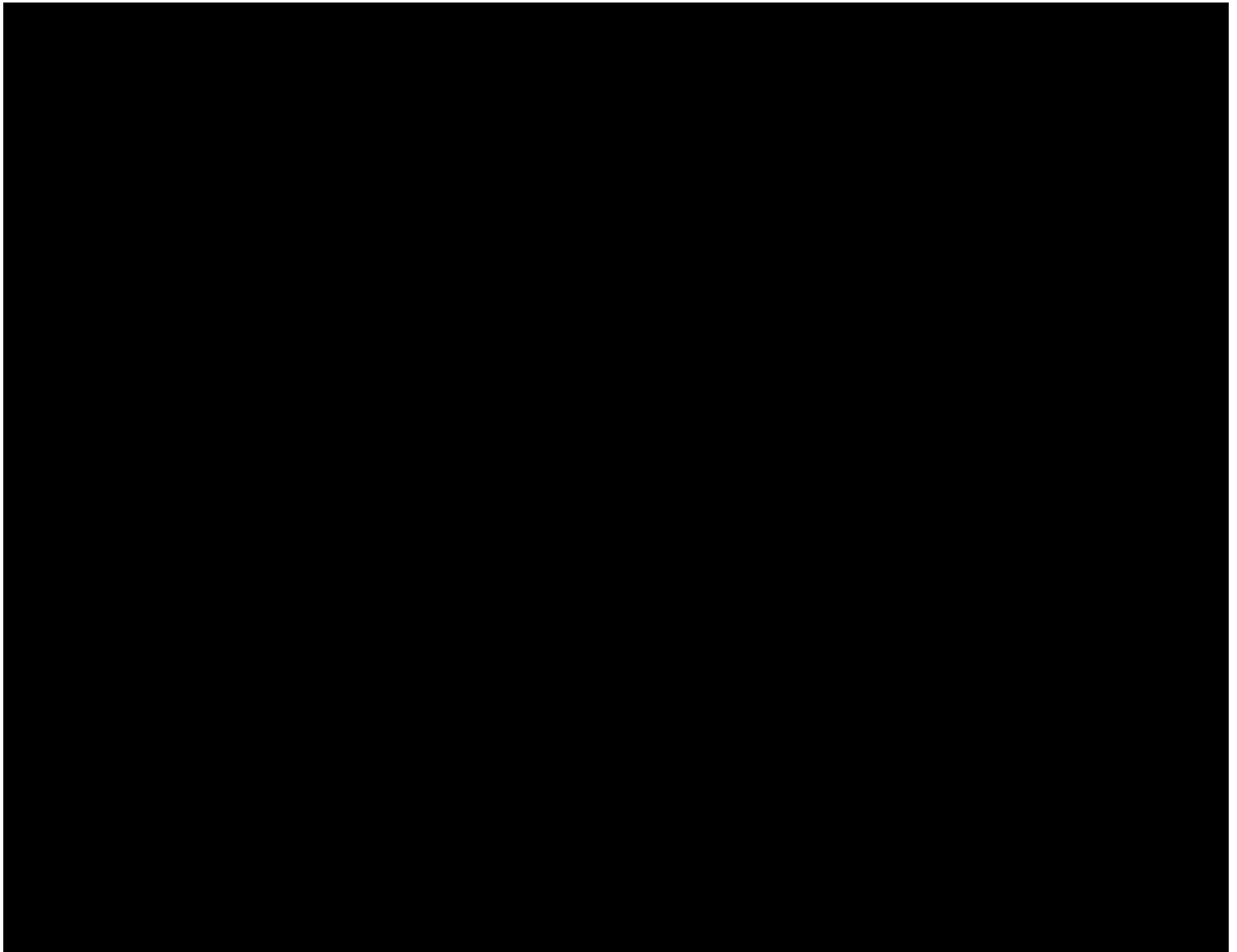
44. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

See above - arguably it is currently a grossly racist policy to disadvantage the majority of the population with a language they don't understand. This is hardly in line with the UK policy of multiculturalism!

## About you

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

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



**3733**

**Mrs Jane Davies**

## View results

Respondent

280

Anonymous

20:55

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Planning of housing development near Crick, Monmouthshire

I wholly object to the above based on the infrastructure being usable to cope with more traffic and also the water levels of the area, as this is a flood plain and is extremely prone to flooding

HIGH RISK to the environment of not being able to cope with rising water levels especially when there are more prolific storms in said area

The MCC has insufficient manpower to cope with the excess rain and storm drainage systems at the moment in the area

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

19. Is your representation in support or objection? \*

Support

Objection

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

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

\*

There should not be anymore gypsy sites ,otherwise we'll be inundated with unauthorised ones which is what has happened in CARDIFF ,SOUTH GLAMORGAN

Thus is what will happen in Monmouthshire too

Just visit Lamby Way in CARDIFF to investigate and see for yourselves

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

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

Yes

No

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

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

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

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

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

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

It will cause more traffic and pollution to the area  
Infrastructure isn't sound enough to deal with more traffic  
Roads aren't maintained enough  
Excessive potholes

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

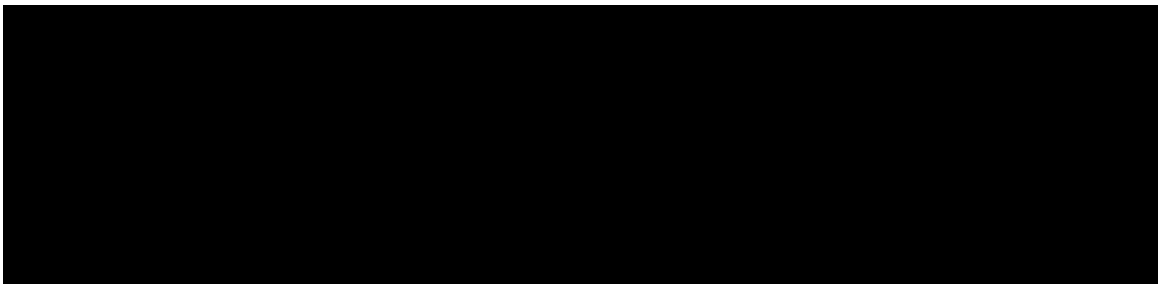
## Part 5: Welsh Language

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

None

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

N/a



**3734**

**Mrs Jane Tapsell**

## View results

Respondent

381

Anonymous

10:15

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

peace and quiet. The view  was the determining factor of our purchase. We are currently looking at open fields and woods. Listening to the sheep. I love the view. It will be no more, after the proposed building. The road is crazy busy most of the day and that will inevitably get so much worse. The traffic on the roundabout at Larkfield going into and out of Chepstow is a nightmare now at best. We will be truly gutted if the planning is passed. It will make Chepstow a commuter town. No personality and no identity. I will wish I hadn't moved here!

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

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

13. Would you like to comment on this question \*

Yes

No

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

14. Would you like to comment on this question \*

Yes

No

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

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

28. Do you consider that the Plan is sound? \*

Yes

No

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

Yes

No

## Part 5: Welsh Language

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

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

**3735**

**Ms Jane Westwood**

## View results

Respondent

372

Anonymous

13:24

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

The development of this housing will impact the traffic in the location. The pressure on surrounding Rio add schools and services of drs etc is too great. The position of the site is not appropriate Surely there are better areas working Abergavenny to build

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

13. Is your representation in support or objection? \*

Support

Objection

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

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

\*

As previous comments

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

15. Would you like to comment on this question \*

Yes

No

16. Is your representation in support or objection? \*

- Support
- Objection

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

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

\*

As previous

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

18. Would you like to comment on this question \*

- Yes
- No

19. Is your representation in support or objection? \*

- Support
- Objection

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

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

\*

Object

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

21. Would you like to comment on this question \*

Yes

No

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

22. Would you like to comment on this question \*

Yes

No

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

23. Would you like to comment on this question \*

Yes

No

24. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Object

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

26. Would you like to comment on this question \*

Yes

No

27. Is your representation in support or objection? \*

Support

Objection

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

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

\*

There has to be better options to build additional properties. I would consider build better infrastructure of drs improving removal of waste prior to houses. Building and then waiting for demand is not appropriate

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

29. Would you like to comment on this question \*

Yes

No

30. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Object

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

32. Would you like to comment on this question \*

Yes

No

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

33. Would you like to comment on this question \*

Yes

No

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

34. Would you like to comment on this question \*

Yes

No

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

35. Would you like to comment on this question \*

Yes

No

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

36. Would you like to comment on this question \*

Yes

No

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

37. Would you like to comment on this question \*

Yes

No

38. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Object

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

40. Would you like to comment on this question \*

Yes

No

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

41. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

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

42. Do you consider that the Plan is sound? \*

Yes

No

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

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

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

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

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

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

It fails  
To have been completely explained and fully  
Consulted upon

### Part 4: Appearance at Examination Hearing Sessions

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

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

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

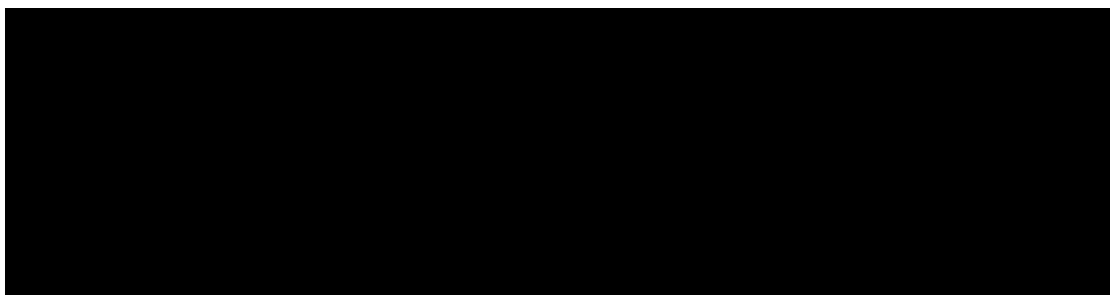
Yes

No

## Part 5: Welsh Language

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

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



**3736**

**Mr Hugh Taylor**

## View results

Respondent

541

Anonymous

206:23

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

My objection relates principally to the proposals for Policy HA3 relative to the land at Mounton Road, Chepstow.

My objection is relative to "2. Responding to our climate and nature emergency".

Whilst the cessation of the M48 tolls was universally welcomed there has been a long standing issue regarding road traffic generated pollution and increasingly traffic bottlenecks. Chepstow already suffers from peak traffic flows due to the lack of direct access to the M48 at Caldicot and the volume of traffic that flows through the town from Gloucestershire. There has been significant housing development taken forward around Chepstow with no solution to the level of traffic or the consequential pollution. The created traffic movements have become a referred problem for the residents of Chepstow and in turn for Monmouthshire CC to solve. That has been exacerbated by the change of use on the former Larkfield Garage site with the fast food and other outlets combined with passing traffic creating very significant congestion along the A48 and particularly at the Long Beach roundabout.

The subject RDLP establishes the plan to build a strategic mixed use development (Policy HA2) being Land to the East of Caldicot and North of Portskewett including 770 residential units. That development being east of Caldicot will see even further traffic funneling along the A48 seeking access to the M48/M4.

Without access to the M48 at Caldicot and provision to handle the traffic from Gloucestershire by way of direct access to the M48 Newhouse roundabout Chepstow is just not development enabled. Until the road network can handle the current level of traffic and any uplift in traffic movements from increased RDLP allocations then there is no case for further development.

I am also of the view that assuming those concerns can be assuaged that the development land surrounding the Racecourse Garage should be added back to the plan and more housing built. Other than local politics there was no reason for that site to be taken out of the plan. The position is binary either Chepstow is ready for extra development or not.

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

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

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

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

\*

This is a paradox, as I am supportive of what the plan is seeking to deliver but the economic reality is that South Monmouthshire and neighboring Newport are dormitories for Bristol and Cardiff as the economic drivers of the Western Gateway area. Without suitable transport links and road improvements the policy ambitions will be a failure.

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

14. Would you like to comment on this question \*

Yes

No

15. Is your representation in support or objection? \*

Support

Objection

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

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

\*

The objection is as previously stated. Without the necessary infrastructure development should not be contemplated in Chepstow.

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

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

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

I am supportive of a green wedge being continued between Chepstow, Pwllmeyric and Mathern.

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

20. Would you like to comment on this question \*

Yes

No

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

21. Would you like to comment on this question \*

Yes

No

22. Is your representation in support or objection? \*

Support

Objection

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

We support these policies but feel that there is very little evidence of any current net zero features being brought forward in the county.

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

24. Would you like to comment on this question \*

Yes

No

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

27. Is your representation in support or objection? \*

Support

Objection

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

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

\*

Policy S7. I am of the view that relative to HA3 it is unlikely that a site of 146 units will be able to carry a 50% affordable housing requirement. A lack of viability will result in deferred development at best and compromised development of a [REDACTED] quality at best.

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

29. Would you like to comment on this question \*

Yes

No

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

30. Would you like to comment on this question \*

Yes

No

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

31. Would you like to comment on this question \*

Yes

No

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

32. Would you like to comment on this question \*

Yes

No

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

33. Would you like to comment on this question \*

Yes

No

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

34. Would you like to comment on this question \*

Yes

No

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

35. Would you like to comment on this question \*

Yes

No

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

36. Would you like to comment on this question \*

Yes

No

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

37. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

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

38. Do you consider that the Plan is sound? \*

Yes

No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

This submission has outlined the failure to recognise the traffic challenges that Chepstow already faces and the consequences for air quality that has been an issue for around a decade. The plan is generally well-intentioned but lacks reality around the reliance for employment that requires the local population to travel to locations outside of Monmouthshire. The Council is hemmed in by the policies of the Welsh Assembly Government that results in the proposed plan being more based on hope than expectation. An example is the fact that the Welsh rail franchise does not serve Bristol and it is a challenge to commute to Bristol by rail.

## Part 4: Appearance at Examination Hearing Sessions

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

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

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

- Yes
- No

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

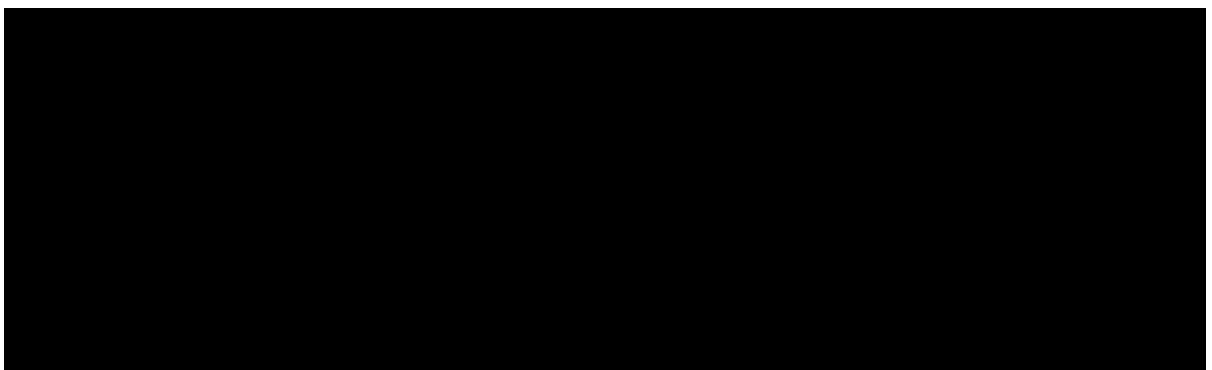
Welsh

English

## Part 5: Welsh Language

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

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



**3739**

**Mrs Heather Burns**

## View results

Respondent

354

Anonymous

13:52

Time to complete

### Part 1: Contact Details

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

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

[Redacted]

## Part 2: Your Representation

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

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

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

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

\*

There is not enough infrastructure to support the new developments and also to have recycling centre [Redacted] is going to have environmental impact on the health of the residents where are we going to find schools doctors and dentists to deal with increased demand as we can't even get appointments at the moment with doctors and dentists the roads are a mess the queues must have an impact on the ozone layer

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

11. Would you like to comment on this question \*

Yes

No

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

12. Would you like to comment on this question \*

Yes

No

13. Is your representation in support or objection? \*

Support

Objection

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

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

\*

To have sufficient infrastructure in place

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

15. Would you like to comment on this question \*

Yes

No

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

16. Would you like to comment on this question \*

Yes

No

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

17. Would you like to comment on this question \*

Yes

No

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

18. Would you like to comment on this question \*

Yes

No

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

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

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

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

\*

They will put existing Infrastructure under enormous pressures and cannot cope now without these extra demands

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

22. Would you like to comment on this question \*

Yes

No

23. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I think they should be moved to an area that is not next the motorway and are treated with respect and dignity they have specialist school for their education like they have in Bristol

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

25. Would you like to comment on this question \*

Yes

No

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

26. Would you like to comment on this question \*

Yes

No

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

27. Would you like to comment on this question \*

Yes

No

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

28. Would you like to comment on this question \*

Yes

No

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

29. Would you like to comment on this question \*

Yes

No

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

30. Would you like to comment on this question \*

Yes

No

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

31. Would you like to comment on this question \*

Yes

No

32. Is your representation in support or objection? \*

Support

Objection

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

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

\*

I feel that you are building on flood plain and will increase the risk of flooding by tenfold and lower the property price of the house in treetops

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

34. Would you like to comment on this question \*

Yes

No

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

35. Would you like to comment on this question \*

- Yes
- No

### Part 3: Tests of Soundness

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

36. Do you consider that the Plan is sound? \*

- Yes
- No

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

- Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- Fails Test 3: Will the Plan deliver (is it likely to be effective)?

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

I have great concerns about environmental impact wit the extra traffic on roads and the need for bypass is crucial for this to work

### Part 4: Appearance at Examination Hearing Sessions

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

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

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

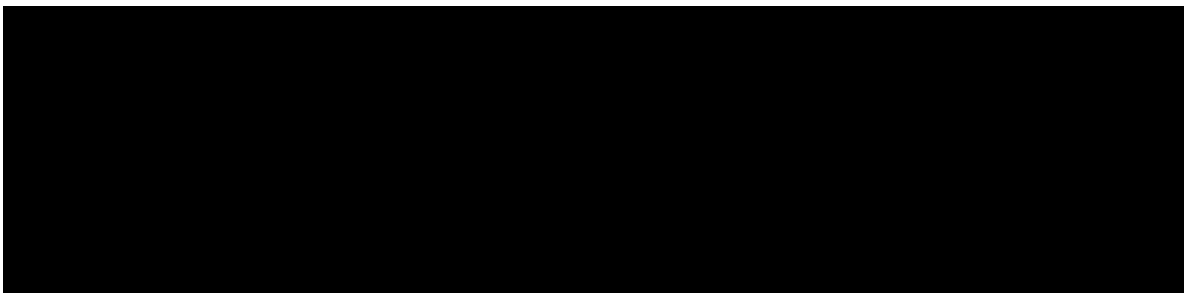
Yes

No

## Part 5: Welsh Language

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

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



**3740**

**Mrs Helen Carey**

## View results

Respondent

367

Anonymous

13:23

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

The town cannot cope with current population in terms of dentists, doctors and schools. Are more dentists, doctors and school places to be made available with the additional increase in population? The proposed site is on the side of one of Abergavenny landmark mountains that brings tourists in to the town. It will ruin the rurality of that area. The a465 trunk road that will effectively run through a housing estate. I appreciate the need for additional social housing but surely brown land can be found to redevelop

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

Support

Objection

13. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

See previous answer

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

14. Would you like to comment on this question \*

Yes

No

15. Is your representation in support or objection? \*

Support

Objection

16. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

See previous answer

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

19. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

See previous answer

**Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

20. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

21. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

22. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the infrastructure policies? (Policies S6, & IN1)**

23. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

24. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

26. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

27. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)**

28. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

29. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)**

30. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)**

31. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

32. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

33. Would you like to comment on this question \*

Yes

No

## Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

34. Do you consider that the Plan is sound? \*

Yes

No

35. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

36. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

Relocate to a different site that is not part of our local heritage.

## Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

37. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

Yes

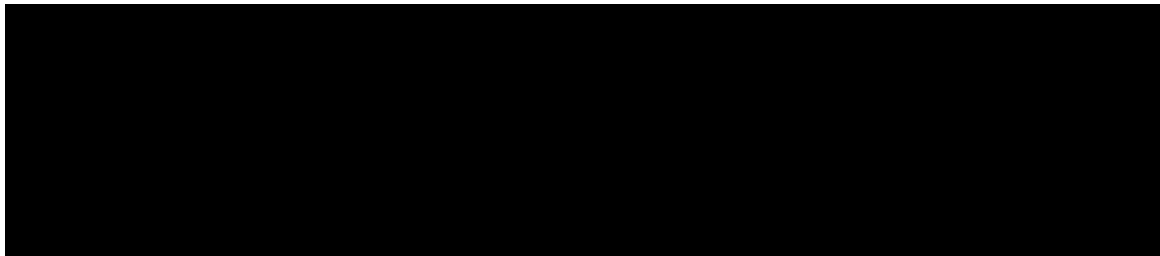
No

## Part 5: Welsh Language

38. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Abergavenny is not a Welsh speaking town in general this will make no difference to that

39. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



**3741**

**Miss Helen Moody**

## View results

Respondent

391

Anonymous

08:03

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

The roads cannot cope with current traffic. It is chaos every morning and evening. No doctors appointments ever available. Dentists only private no NHS. Schools and nurseries already full. Pollution in Chepstow is some of the worst in wales and this will only add

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

11. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

12. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

13. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

14. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

15. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

16. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the infrastructure policies? (Policies S6, & IN1)**

17. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

18. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**

19. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

20. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

21. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)**

22. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

23. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)**

24. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

26. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

28. Do you consider that the Plan is sound? \*

Yes

No

29. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

30. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

#### Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

31. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

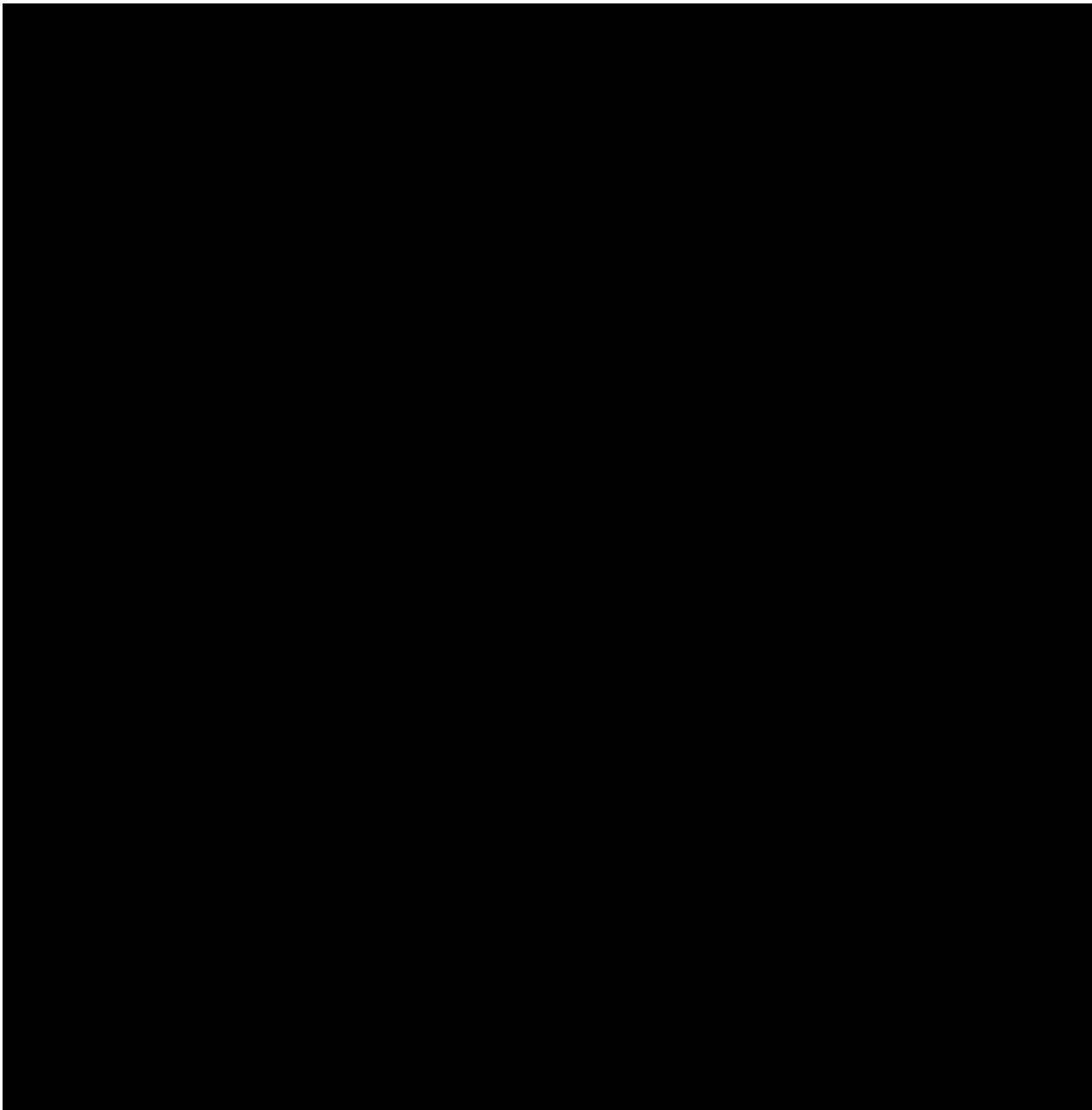
Yes

No

#### Part 5: Welsh Language

32. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

33. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



**3742**

**Mrs Janet Turner**

## View results

Respondent

278

Anonymous

08:12

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number

7. Email \*

## Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I am opposed to Portskewett being allotted such a vast development plan after already having more than a fair share of house building in the last few years. There is already a mixture of housing types and would argue that a survey of only 6 winter months to achieve the average house price as stated is not long enough for a true reflection.

I am totally baffled by what seems a nonsensical decision to construct so many extra buildings in Portskewett with resultant damage to a great source of local income and discouraging visitors to the area and nearby area which is within the Gwent Levels an SSSI and one of Monmouthshire's best.

The title of this proposal needs to be renamed to reflect exactly where it is. It is Portskewett and sits completely within the council ward of Portskewett. Having the lead name as Land to the East of Caldicot is wrong and whether intentional or not, it does confuse people.

1. The David Broome Event Centre is a great asset generating income and visitors into the area. It's a nationally or even internationally renowned equestrian centre providing local employment opportunities as well as bringing visitors who spend money locally. Sometimes unseen by way of buying services such as veterinary consultations for visiting accompanying dogs etc.

2. Being situated very close to Nedern Brook the area is already prone to flooding every winter. More houses being built will surely increase flooding and means unsuitable for homes. Nedern Brook completely floods Caldicot Castle grounds and is next to David Broome's. Nedern Brook floods every winter providing a flood meadow habitat supporting wintering bird species and was designated an SSSI in 1988.

3. On the opposite side of Crick Road there are areas of ancient woodland. These are defined as irreplaceable habitat. A valuable natural asset important for wildlife which include rare and threatened species.

4. Caldicot Castle will become less attractive for visitors - another loss of local income.

5. The Neolithic burial site of Heston Brake is only a short distance away.

6. I suspect your commuting statistics are also very out of date. I do not think the ONS 2021 annual population survey would now be accurate. Very importantly the roads are not suitable to take all the extra traffic. Crick Road is unclassified, very narrow, twisty and bendy and already has problematic junctions at each end. One with the A40 the other with the B4245. The B4245 is already a troublesome road with bends and dips. The extra traffic and especially multiple junctions will make it even more dangerous.

7. Having a very large development in between Chepstow and Caldicot will mean even more traffic will head into Chepstow as closer to the connecting main road M40 to go onto join the M4 and M5 after using the M48 Severn Bridge. As Chepstow, another Monmouthshire gem, is already gridlocked, why does it make sense to add to the problem? Surely a large development should be placed on the other side of Caldicot and nearer to the M4 junction. The M48 Severn Bridge is often closed in inclement weather and only the M4 Prince of Wales Bridge is open.

8. Although suitable employment opportunities are welcome they should only be of the type which keeps traffic to a minimum, at best just those employees who have to drive there. It should not involve larger vehicles or multiple deliveries.

9. The current infrastructure is not sufficient to support the current population. It is often difficult to get a GP appointment, Pharmacies are working to breaking point and it's impossible to get an NHS dentist.

The proposed Portskewett development is a very ill-advised one so please reconsider!

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

11. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

12. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

13. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

14. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

15. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

16. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the infrastructure policies? (Policies S6, & IN1)**

17. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

18. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**

19. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

20. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

21. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)**

22. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

23. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)**

24. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

26. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

27. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

28. Do you consider that the Plan is sound? \*

Yes

No

29. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

30. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

There should be "unknown" or "not now" selections on all the previous questions

## Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

31. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

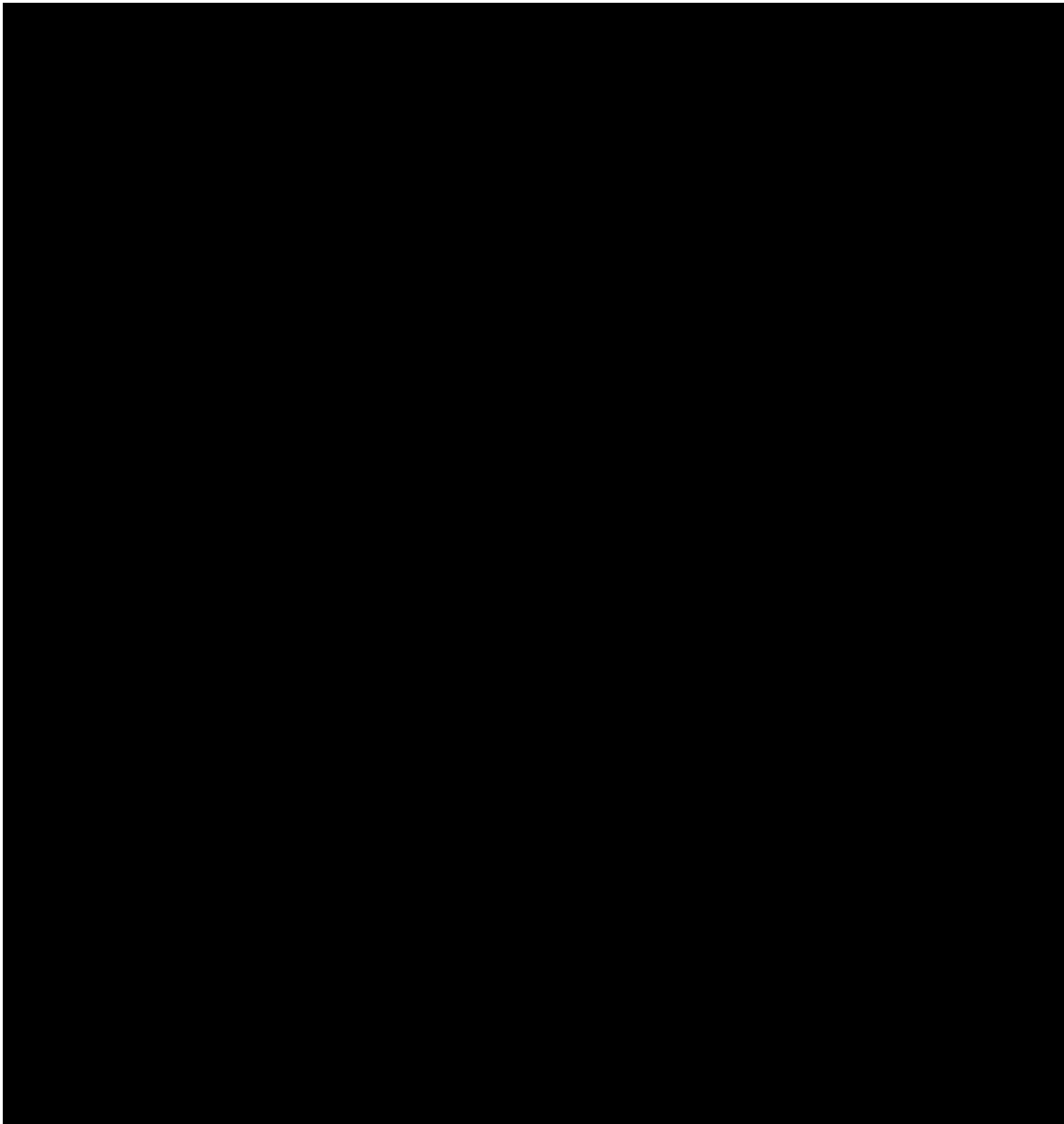
Yes

No

## Part 5: Welsh Language

32. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

33. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



g  
m



**3743**

**Mrs Jennifer Richards**

## View results

Respondent

466

Anonymous

06:59

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

9. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

10. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

11. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the design and sustainable place-making policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

12. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

13. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)**

14. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the infrastructure policies? (Policies S6, & IN1)**

15. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies?  
(Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

16. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the residential site allocations?  
(Policies S8, HA1 – HA18)**

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

19. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

There is already far too much of a traffic build up on and around Highbeech roundabout at all times of the day but especially around peak/rush hour times. Building more residential properties in this area would further contribute to the already high volume of traffic with associated delays, inconvenience and pollution. There needs to be a massive change to the existing road structure/plan if any of these houses are built although the real 'change' I would like to see to this Plan would be that it is dropped in its entirety.

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

20. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

21. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies?  
(Policies S12, T1 & T2)**

22. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies?  
(Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

23. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres  
policies? (Policies S14, RC1, RC2, RC3 & RC4)**

24. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

26. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

27. Would you like to comment on this question \*

Yes

No

## Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

28. Do you consider that the Plan is sound? \*

Yes

No

29. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

30. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

ANY increase in the volume of traffic using Highbeech roundabout will cause further problems to an already dreadful situation.

## Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

31. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

Yes

No

## Part 5: Welsh Language

32. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

33. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



**3744**

**Mrs Jennifer Schofield**

## View results

Respondent

95

Anonymous

07:25

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

### Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I object to the Drewen Farm access via kingswood gate estate

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

11. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

12. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

13. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

14. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

15. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

16. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the infrastructure polices? (Policies S6, & IN1)**

17. Would you like to comment on this question \*

Yes

No

18. Is your representation in support or objection? \*

Support

Objection

19. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

Improving local infrastructure is a necessary requirement before building

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

20. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**

21. Would you like to comment on this question \*

Yes

No

22. Is your representation in support or objection? \*

Support

Objection

23. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I object to Drewen farm current proposal. Access should be via the industrial estate by naff naff. Water run off needs to be fixed, current electricity issues with power cuts need to be fixed

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

24. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)**

26. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

27. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)**

28. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)**

29. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

30. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

31. Would you like to comment on this question \*

Yes

No

### Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

32. Do you consider that the Plan is sound? \*

Yes

No

33. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

34. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

There has been insufficient assessment of options related to access to Drewen farm

### Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

35. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

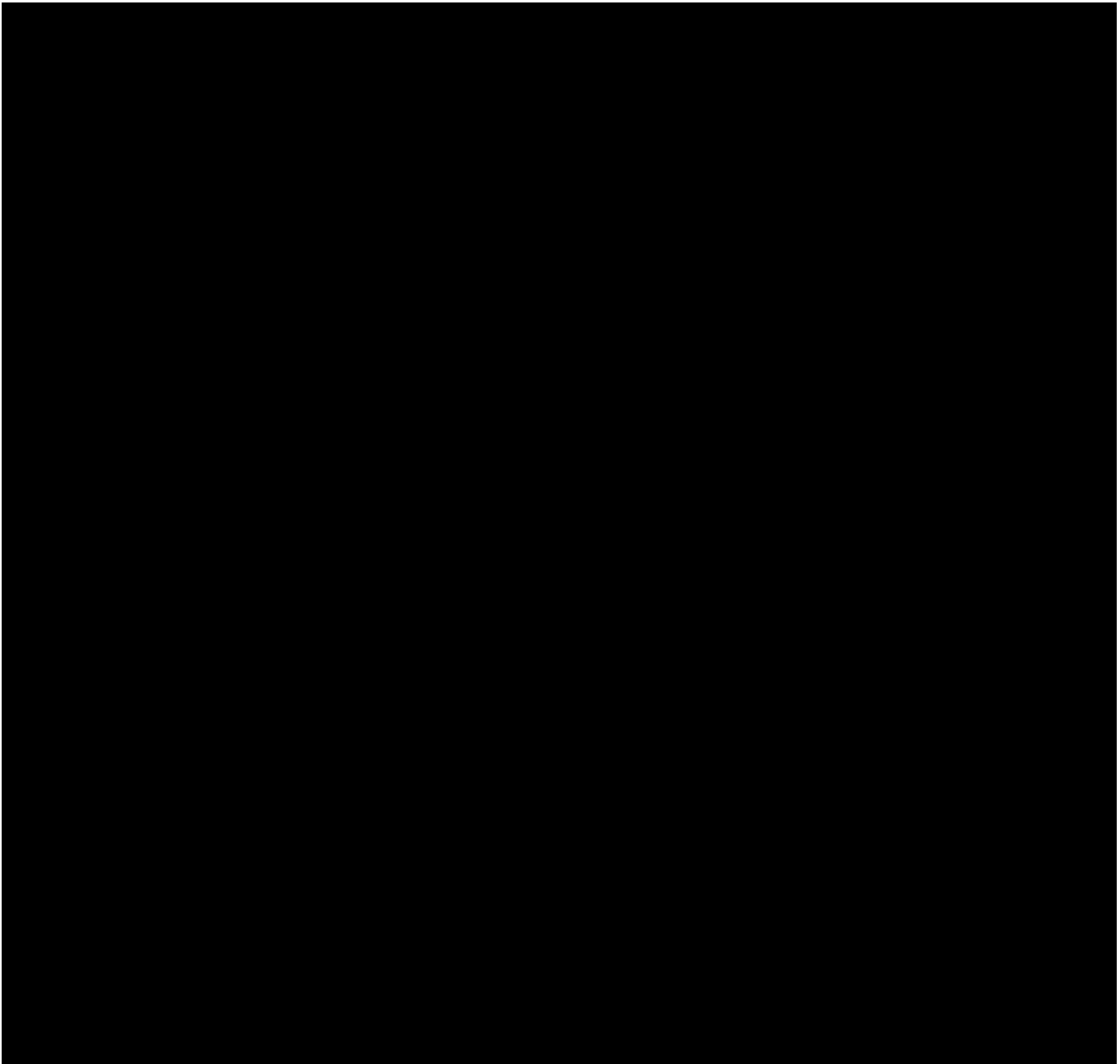
Yes

No

## Part 5: Welsh Language

36. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

37. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



**3745**

**Mrs Jenny Carpenter**

## View results

Respondent

321

Anonymous

167:54

Time to complete

### Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title \*

2. Name \*

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address \*

6. Telephone number \*

7. Email \*

## Part 2: Your Representation

**Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?**

8. Would you like to comment on this question \*

Yes

No

9. Is your representation in support or objection? \*

Support

Objection

10. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

The issues and challenges appear to have covered relevant points but I cannot see how and where these are all being addressed in your policy.

**Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**

11. Would you like to comment on this question \*

Yes

No

12. Is your representation in support or objection? \*

- Support
- Objection

13. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I don't believe Monmouthshire has the ability to deliver at pace! Surely that is up to the developers and the speed and competence of the Planning department. Restrictions net zero and percentage of affordable homes will mean developments are on. Knife edge of affordability.

**Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**

14. Would you like to comment on this question \*

- Yes
- No

15. Is your representation in support or objection? \*

- Support
- Objection

16. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

The main development sites appear to be in relevant places but the smaller settlement sites simply seem to be adding small developments to all other villages and towns whether they are appropriate or not just to fulfill the proposals.

**Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**

17. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)**

18. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)**

19. Would you like to comment on this question \*

Yes

No

20. Is your representation in support or objection? \*

Support

Objection

21. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I don't object to the policies but believe that these will add construction costs that will ultimately increase property costs when Monmouthshire already has a high average property cost.

**Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)**

22. Would you like to comment on this question \*

Yes

No

23. Is your representation in support or objection? \*

Support

Objection

24. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

These are vitally important policies when the proposals are to build on green belt land.

**Do you have any comments on the infrastructure policies? (Policies S6, & IN1)**

25. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)**

26. Would you like to comment on this question \*

Yes

No

27. Is your representation in support or objection? \*

Support

Objection

28. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

I am objecting to the insistence that for all new developments 50% of the site must be allocated to affordable housing and whilst net zero carbon would be desirable if written in the plan and proves to be unsustainable in the timeframe is there a provision to alter this.

I consider this requirement to be detrimental to the need for a considerable number of houses to be build to accommodate the needs of local communities. Such restrictions will devalue the land for the owners and make development unsustainable for the developers. As such we may well end up in a situation where, even though the land is included in the RLDP it will not actually be released for development.

Whilst I understand the need for affordable housing there is also a need for smaller private housing but making restrictions such as the 50% rule I believe that the other 50% will need to be higher end property to make the site profitable.

This has already been seen with the planning permission already approved in Little Mill where the affordable housing became the S106 contribution thus no help was available to promote the local community and whilst this site was only 30% affordable the remaining properties are all 4 bedroom detached. What about those who are able to save a deposit and wish to get on the private property ladder. They are unlikely to start with a 4 bedroom detached. There is a need for smaller starter homes in the private sector. Your policy will rely on house movements creating a chain which can easily fall down and in any case moving house has become very expensive for all those involved.

I acknowledge that the private homes should be of a mixed type but when there are only 20 homes allocated for the site and 10 are to be affordable there is very little mix left.

I would understand the 50% rule for the larger sites in the County where they can be allocated throughout the whole site, not just in a small pocket but this requirement is certainly not appropriate for the smaller sites.

I believe 30% affordable to be an acceptable mix with net zero certainly desirable but not essential. There should be no provision for the affordable homes to be part of any 106 agreements and this should be made clear with inclusion in the plan.

**Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**

29. Would you like to comment on this question \*

Yes

No

30. Is your representation in support or objection? \*

Support

Objection

31. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

The reasons for the allocation of rural sites is not recorded and this would be helpful to ascertain why one site has taken preference over others. Smaller sites should not be restricted by the same policies as the larger sites. Again too many restrictions May result in the land not being released due to affordability.

I believe 30% affordable to be an acceptable mix with net zero certainly desirable but not essential for the smaller sites. This would allow some smaller private homes to be accommodated within plans which would assist the younger population to get a foot on the housing ladder and rebalance the aging demography. There should be no provision for the affordable homes to be part of any 106 agreements and this should be made clear with inclusion in the plan.

**Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)**

32. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the employment site allocations? (Policies EA1 & EA2)**

33. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)**

34. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)**

35. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)**

36. Would you like to comment on this question \*

Yes

No

**Do you have any comments on the community infrastructure and open space policies? (Policies S15, CI1, CI2, CI3 & CI4)**

37. Would you like to comment on this question \*

Yes

No

38. Is your representation in support or objection? \*

Support

Objection

39. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

Community infrastructure is lacking in most rural areas. This plan mentioned retention and safeguarding of existing infrastructure but no provision for enhancement.

**Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)**

40. Would you like to comment on this question \*

Yes

No

**Do you have any other comments to make on the Deposit RLDP and/or supporting documents?**

41. Would you like to comment on this question \*

Yes

No

42. Is your representation in support or objection? \*

Support

Objection

43. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed.

\*

This consultation document has been very difficult to navigate. It would be helpful to see the whole document before needing to complete sections. For those of us unfamiliar with the policy numbers it has take a lot of time to refer back to the full deposit plan as the policy numbers were not recorded in the summary document.

### Part 3: Tests of Soundness

Please refer to the notes at the for further

guidance: <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf>

44. Do you consider that the Plan is sound? \*

Yes

No

45. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? \*

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?

Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?

Fails Test 3: Will the Plan deliver (is it likely to be effective)?

46. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): \*

Where are the tests of soundness? The end of the form is submit!

The plan may give the opportunity to deliver but it cannot be delivered by MCC alone. I truly hope these exacting policies do not make delivery unaffordable for the developers.

## Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

47. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

Yes

No

## Part 5: Welsh Language

48. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I cannot see this having any effect on the use of Welsh language

49. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

No thoughts on this.

