



**Monmouthshire County Council**  
**Replacement Local Development Plan (2018-2033)**  
**Growth and Spatial Options Paper**  
**Representation Form**

Monmouthshire County Council is undertaking a non-statutory consultation on the Growth and Spatial Options Paper for the Replacement Local Development Plan (RLDP). This Paper sets out growth and spatial options for the RLDP, together with the implications of each option and the extent to which they will achieve the RLDP objectives. It identifies what is currently the Council's preferred growth and spatial options that are considered to best address the County's key issues/challenges and meet the RLDP objectives. The current preference will be reviewed in the light of consultation responses.

The Growth and Spatial Options Paper is available for public consultation from **Monday 4<sup>th</sup> January 2021 to Monday 1<sup>st</sup> February 2021**. All comments made should be restricted to the content of the Growth and Spatial Options Paper. Please use this form to respond to the consultation using additional sheets as necessary.

The Growth and Spatial Options Paper, together with an Easy Read version, are available to view on the Council's website. Full details of the consultation documents and events can be found via the Council's website at: <https://www.monmouthshire.gov.uk/planning-policy/planning-policy-current-consultations/> Further copies of the form can be obtained via the same link.

**PART 1:     Contact details**

Your/ your Client's details		Agent's details <i>(if relevant)</i>
Title:	Mr	
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Job title: <i>(where relevant)</i>	Secretary	
Organisation: <i>(where relevant)</i>	The Chepstow Society	

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You should include all your comments on this form. Please submit them electronically using the following link: <https://www.monmouthshire.gov.uk/planning-policy/planning-policy-current-consultations/>

or email the form to [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk)

#### Office Use Only

Representor Number .....

Submission Type (email/web/letter etc) .....

## PART 2: Your Comments

**Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help the Authority to understand the issues you raise.**

### RLDP Growth Options:

**Growth Option 5 (Population-led Projection) is our preferred option. On the basis of the evidence provided, do you agree with our preferred growth option? Please explain why and provide your reasons.**

**No.** Option 5 has a number of substantial drawbacks and is unsupported by evidence. Option 2 which more closely follows Welsh Government predictions is more acceptable and realistic.

The preferred option 5 assumes that a greater population increase produces more local jobs and attracts inward investment, and of itself creates a diverse economy while promoting retail growth in revitalized town centres. No indication is given of how and why building more houses to attract a bigger population will lead to inward investment and revitalization of town centres - this is merely asserted as an unsubstantiated assumption. MCC seems to believe that if land is allocated for more employment and housing sites that there will be more jobs in Monmouthshire. Other than construction, there is little reason to think that other businesses will wish to relocate to the county.

The Welsh Government aspiration is for 30% of employed people to be working from home, but the pandemic may lead to this being much higher. Companies have discovered that home working can function well and many people are finding they quite like it. More people working from home, however, does not mean that they are employed by businesses in Monmouthshire. The businesses which allow and encourage home working could be located anywhere in the world and certainly easily elsewhere in the UK. This may well make Monmouthshire a more attractive place to migrate into, but that in migration does not necessarily lead to increased local employment nor necessarily to attractive and well supported town centres.

Increased in migration is assumed to consist of a large element of the 16-64 year age group who, it is assumed, will ensure creation of additional jobs. There can be no guarantee that those wishing to move into Monmouthshire will only be in this age group. Furthermore, the paper appears to see older people as a drain on society requiring special provision and support, although Table 2 in paragraph 2.11 notes that the economic activity rate in older age groups (+55) is expected to increase. It is hard to reconcile these conflicting assumptions, and there is no further reference in the document to the contribution to employment which may be expected from this older group of residents.

Retail has taken an severe battering during the pandemic. Small and large shops are closing all over the county. In Chepstow the High Street is a shadow of its former self, consisting now of a few multiples, charity shops, nail bars and chemists. The Welsh Government has been pushing people towards internet shopping – even those who never used this method before – by refusing to allow people to buy ‘non-essential items’, exacerbating a trend which may be extremely hard to reverse.

Paragraph 2.76 also asserts that the MCC preferred option will provide opportunities to sustain services and facilities, to secure infrastructure improvements and to secure green infrastructure. All of these come at significant cost over a period when recovery from the financial impacts from the pandemic may be difficult and uncertain. Increased council tax receipts from new properties will not

sustain such aspirations and should not underpin planning proposals.

In respect of infrastructure, Objective 14 is to ensure appropriate physical and digital infrastructure (including community and recreational facilities, sewage, water, transport, schools, healthcare and broadband) is in place or can be provided to accommodate new development'. There appears to be nothing in the document about making sure the same provision is made for existing settlements. The assumption appears to be that developers will foot the bill for new infrastructure of all kinds but it is unrealistic to expect that CIL/S106 can deal with all the additional infrastructure required to support new development, and of course it will not be able to update or provide new infrastructure where required by existing development.

Table 11 assessing Option 5 against RLDP objectives makes further questionable assumptions apart from the comments relating to Objectives 1 and 2 on economic growth and retail. The assessment of Objective 4 gives building in the flood plain the green light. Surely this is unacceptable, and why is this objective not linked to climate change which is likely to increase the probability of flooding. Assessment of Objective 8 asserts that new developments will be encouraged to support healthier life-styles. Land allocations and planning conditions are simply unable to achieve this.

**If you have a preference for a different option, please state which option and provide details of how your preferred option will address the issues/challenges Monmouthshire is facing and the RLDP and ISA objectives?**

#### **OPTION 2**

Growth of this order, around 260dpa, seems reasonable in present circumstances, though even this exceeds the higher variant projection. It is similar to the average of 269dpa over the past fifteen years, and we consider this to be a sustainable low-risk strategy at a time when the shape of the next decade is unprecedentedly uncertain. Should the county succeed in attracting substantial employment growth and investment in public transport etc, there are mechanisms for allocating extra housing land where it is needed and/or revising the LDP. The Plan must provide the proper opportunity to make a realistic balanced assessment of the prospects and needs of Monmouthshire in a regional context, perhaps benefiting from projections that take the 2021 Census into account.

Option 1 is likely to be unrealistic; Option 3 puts too much reliance on the questionable aim of adjusting the age structure and on unsubstantiated job creation within the county; Options 4 and 6 are unacceptable for similar reasons to Option 5.

Any strategy that relies on building substantially more market housing than is the projected need cannot be sustainable unless sure to be accompanied by local employment growth, preferably in the green economy. Building excessive market housing in order to meet affordable housing needs should not be the method of dealing with that challenge, nor in the hope of improving the local demography or of raising council tax revenue.

#### **RLDP Spatial Options:**

**Spatial Option 2 (Distribute Growth Proportionately across the County's most Sustainable Settlements) is our preferred option. On the basis of the evidence provided, do you agree with our preferred spatial option? Please explain why and provide your reasons.**

Options 1 and 2 appear to be very similar in terms of their implications for Chepstow and adjoining areas. The broad approaches are supported. However, the implications of the higher level of growth proposed under Growth Option 5 need to be fully addressed, because of the concerns that substantial development at Chepstow, without the necessary improvements to infrastructure, would

have a damaging impact on the town's environment and quality of life.

Options 3 and 4 are not supported.

**If you have a preference for a different option, please state which option and provide details of how your preferred option address the issues/challenges Monmouthshire is facing and the RLDP and ISA objectives?**

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