



Monmouthshire County Council Replacement Local Development Plan (2018-2033) Preferred Strategy Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **05 July 2021 to 31 August 2021**. All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub / library via the request and collect service,¹ or you can photocopy this form.

PART 1: Contact details

Your/ your Client's details		Agent's details* (if relevant)
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*Note if agent's details are included, all correspondence will be sent to the agent and not to the persons/organisations given in Part 1.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: <http://monmouthshire.planning-register.co.uk/>

Office Use Only

Representor Number

Submission Type (email/web/letter etc)

¹ <https://www.monmouthshire.gov.uk/community-hubs-and-libraries/>

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 us to understand the issues you raise.

Key Issues, Vision and Objectives: (Paras 3.1-4.3 / Pgs 30-43)

Do you have any comments on the key Issues, Vision and Objectives?

We broadly support the key issues, vision and objectives.

We welcome the recognition of the possible long term social and economic impacts of the COVID-19 pandemic crisis, and suggest that this will need to be taken into account in all future proposals and decisions, especially those based on pre-2019 assumptions.

We consider that the climate change emergency has not sufficiently been taken into account, and that there needs to be a greater emphasis on an approach that minimises the need to travel, protects finite environmental resources such as BMV agricultural land, and ensures that both coastal and floodplain areas at increased risk of flooding are not developed.

Preferred Strategy – Sustainable and Resilient Communities Strategy (Paras 4.4-4.9 / Pgs 44-47)

Do you have any comments on the Sustainable and Resilient Communities Strategy?

We remain opposed to the high level of housing and economic growth proposed, for the reasons set out in our earlier submission (January 2021).

We do not accept the council's opinion (in the Growth and Spatial Options consultation report) that "Growth Option 5... provides a level of growth that would best address the County's key issues/challenges and meet the RLDP objectives...". The level proposed exceeds the Welsh Government's most recent projections; allocates a high proportion of the regional requirement to what is essentially a rural area; allows for a rate of housing development in the county almost double that which has been achieved in recent years; and would require substantial development on the area's BMV agricultural land and other areas of importance in the rural landscape. The ISA (para.6.9) states that: "Given the limited brownfield resource in the County, development is likely to be primarily delivered on greenfield land, with residual negative effects likely. The significance of this effect will increase as the level of growth increases.."

Much is made of the fact that, according to the outdated 2011 census, Monmouthshire has an ageing population with declining numbers of working age. These figures are based on a retirement age of 65 - already an outdated assumption - and takes no account of the fact that many will continue to work for many years. The assertion that an older population 'reduces the number of people using and financially supporting businesses and services' is an inaccurate generalisation, given the high proportion of higher-educated and professional retired people in the county and the importance of the "grey pound". The 'ageing population' argument should not be used to underpin the need for more jobs and more housing.

The Preferred Strategy aligns the creation of 7215 jobs with the higher growth population projection which leads to the allocation of 7605 new houses. The assumption is that new housing provision of itself creates new jobs, and a further assumption is made that these jobs will be within the county because there will be an increase in home working which will decrease commuting. However, home working will allow people to live in Monmouthshire and work for employers who may be anywhere in the world. With additional housing, more people from outside the county may well be attracted to live in Monmouthshire, but this will not add to the number of jobs that could be filled by local residents.

We are concerned that the strategy has not been adequately assessed in terms of its deliverability, taking into account the likelihood of resources being found to provide the investment in infrastructure necessary to enable the level of growth proposed in a way that meets sustainability objectives. Whether or not the aims and objectives can be achieved will be dependent on decisions beyond the remits of the county council and the planning system more widely, including decisions by the UK and Wales governments, by neighbouring authorities including those in England, and service providers such as health boards.

The RLDP needs to take a cautious and precautionary approach, taking into account the increasing uncertainties over future infrastructure provision, and the acknowledged fact that a higher level of growth will have a detrimental effect on the area's environment. Greater weight should be placed on achieving the Council's avowed environmental objectives.

Strategic Policies S1 – Strategic Sustainable and Resilient Growth (Paras 4.10-4.27 / Pgs 47-54)

Do you have any comments on Strategic Policy S1 – Strategic Sustainable and Resilient Growth?

As stated above, we remain opposed to the high level of housing and economic growth proposed, for the reasons set out in our earlier submission (January 2021).

We do not accept the council's opinion (in the Growth and Spatial Options consultation report) that "Growth Option 5... provides a level of growth that would best address the County's key issues/challenges and meet the RLDP objectives...". The level proposed exceeds the Welsh Government's most recent projections; allocates a high proportion of the regional requirement to what is essentially a rural area; allows for a rate of housing development in the county almost double that which has been achieved in recent years; and would require substantial development on the area's BMV agricultural land and other areas of importance in the rural landscape.

We are concerned that the strategy has not been adequately assessed in terms of its deliverability, taking into account the likelihood of resources being found to provide the investment in infrastructure necessary to enable the level of growth proposed in a way that meets sustainability objectives. Whether or not the aims and objectives can be achieved will be dependent on decisions beyond the remits of the county council and the planning system more widely, including decisions by the UK and Wales governments, by neighbouring authorities including those in England, and service providers such as health boards. The RLDP needs to take a cautious and precautionary approach, taking into account the increasing uncertainties over future infrastructure provision.

We are particularly concerned about the inadequate consideration given, especially in the ISA (para 9.25 onwards), to the importance of addressing Chepstow's issues in the context of not only Monmouthshire but also the Forest of Dean. In particular, road traffic from the southern part of the Forest of Dean to the motorway system inevitably passes through the central part of Chepstow, with seriously detrimental impacts on the town's environment and economy. Cross-boundary discussions with the Forest of Dean and Gloucestershire authorities need to be improved, so that a genuinely strategic approach and new initiatives can be taken towards the environmental and infrastructure issues affecting Chepstow.

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.28-4.46 / Pgs55-65)

Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?

In principle, we broadly accept that development should be spread across the county's most sustainable settlements. These include Chepstow, as a town where investment in facilities and infrastructure is urgently necessary, and the economic viability of the town as a whole (including both the town centre and Bulwark) needs to be maintained and developed.

It is generally accepted – and certainly the view of local residents - that Chepstow is under great pressure, in terms of its transport and other infrastructure, as a result of recent, current and proposed (or likely) development in adjoining areas of England such as Tutshill/Sedbury, Beachley, and Lydney, as well as that within Wales. Further development at Chepstow, given the uncertainties over likely infrastructure provision, will exacerbate these problems.

A very cautious approach towards the approval of new greenfield sites for development around Chepstow, and elsewhere, is required. Development in the area must take account of cumulative infrastructure requirements, and decisions in neighbouring areas. We are concerned that all three potential strategic growth options adjoining Chepstow – D, E and F – would have a damaging effect on agricultural land, landscape, and (in the case of E and F) on the need to keep open green wedges between Chepstow, Pwllmeyric and Mathern. We do not accept that development on these sites is necessary. Even if the high housing requirements suggested are agreed, changes in the functioning of town centres following the pandemic may mean that more windfall housing sites within the county's towns will emerge.

The ISA states (6.31) that: “all Options would result in increased vehicular use within Chepstow AQMA, and the permanent loss of BMV agricultural land /greenfield land.” It also states (ISA p.174) that “it is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects”, and recognises that development could worsen air quality issues in and around the town (p.175). Greater weight should therefore be placed on the environmental impact of development at Chepstow.

The relationship between the RLDP strategy and the Future Wales 2040 proposals for green belt west of Chepstow is unclear and needs to be resolved. We support the need to maintain green wedges between the settlements. We note that both Pwllmeyric and Mathern (and other nearby villages including St Arvans, Devauden and Shirenewton) are shown as Main Rural Settlements, which will also be expected to accommodate development.

We are concerned about the distribution of the Main Rural Settlements – in particular, the fact that several villages are shown within the Wye Valley AONB, where development could affect the protected landscape. There are large areas in the central and northern parts of the county where no (or fewer) settlements are shown at the same level, but where landscape protection requirements are less strong.

**Strategic Growth Areas (Please State which Strategic Growth Area you are commenting on)
(Paras 5.45-5.55 / Pgs 88-95)**

Do you have any comments on the potential Strategic Growth Areas? If you would like to suggest site specific allocations, please submit these as part of the Second Call for Candidate Sites process which is running alongside this consultation.

As already stated, we remain opposed to the high level of housing and economic growth proposed, for the reasons set out in our earlier submission (January 2021). We consider that a very cautious approach towards the approval of new greenfield sites for development around Chepstow, and elsewhere, is required.

Development in the area must take account of cumulative future infrastructure requirements, and decisions in neighbouring areas. Chepstow is under great pressure, in terms of its transport and other infrastructure, as a result of recent, current, proposed and likely future development in adjoining areas of the Forest of Dean, in England, such as Tutshill/Sedbury, Beachley, and Lydney, as well as that within Wales. Further development at Chepstow, given the uncertainties over likely infrastructure provision, will exacerbate these problems.

We therefore consider that development of areas D, E and F is not necessary to meet the housing requirements over the plan period. Given the scale of current development within the town, particularly at the former Dendix and former Fairfield Mabey sites, where the implications on infrastructure are not yet clear, a moratorium needs to be placed on further development adjoining the town.

The development of areas D and E would have detrimental effects on landscape and BMV land, but are less poorly located than area F in relation to the town centre. Area E should be considered in two distinct parts – to the west, and east, of St Lawrence Lane – because of significant differences in the landscape value of the two parts and their contribution to maintaining a green wedge west of the town.

The development of strategic area F is strongly opposed. The area is distant from the town centre, and would be unlikely to contribute to any improvements there. Housing in the area would attract outbound commuters, contributing excessively to road traffic. As well as the landscape importance of the historic park and garden, the area should be noted as being of national significance as a gateway to Wales as a whole.

Area F, and at least the western part of area E, should be protected from future development by being maintained as part of the green wedge separating Chepstow from Pwllmeyric and Mathern.

**Strategic Policies S3 – S18 (Please State which Strategic Policy you are commenting on)
(Paras 5.4-5.146 / Pgs 67-132)**

Do you have any comments on the Strategic policies?

We are concerned over whether policy S5 adequately takes into account the cumulative effect of successive developments on the requirement for infrastructure provision. We note that “an Infrastructure Plan will be prepared to accompany the Deposit RLDP, which will identify the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.” We consider that the successful development of this in parallel with the RLDP, and its effective implementation, is of fundamental importance to the future wellbeing of Chepstow.

With regard to policy S8, our concerns about potential development at and immediately west of Chepstow have been set out above. We consider that development of these areas is not necessary to meet the housing requirements over the plan period. A moratorium needs to be placed on further development adjoining Chepstow.

The development of areas D and E would have detrimental effects on landscape and BMV agricultural land, but are less poorly located than area F in relation to the town centre. Area E should be considered in two distinct parts – to the west, and east, of St Lawrence Lane – because of significant differences in the landscape value of the two parts and their contribution to maintaining a green wedge west of the town. Development of the areas would increase the already pressing requirement for improvements to the High Beech (Larkfield) roundabout.

The development of strategic area F is strongly opposed. The area is distant from the town centre but close to the motorway junction, and would be unlikely to contribute to any improvements or investment in the town centre. Housing in the area would attract outbound commuters, contributing excessively to road traffic. As well as the landscape importance of the historic park and garden, the area should be noted as being of national significance as a gateway to Wales as a whole.

We strongly support measures to enhance the economic viability and vibrancy of Chepstow town centre, as mentioned in policy S11. In determining the future of the town centre it will be essential to recognise that traditional high street functions are changing, following the pandemic and through longer-term trends, such as online shopping, while the historic centre remains vital as a social and service hub as well as for its historic interest and value to tourism. New opportunities for affordable housing may emerge through the conversion, to acceptable standards, of commercial properties to residential use.

We acknowledge the mentions of Bulwark and Thornwell centres in policy S11. Particularly at Bulwark, active measures need to be taken to improve the economic viability and attractiveness of this important neighbourhood centre.

We regret that the opportunity is not taken in the document to emphasise the importance of community-driven place plans, such as the Future Chepstow initiative led by Chepstow Town Council, in developing local policies to help deliver high quality places that will benefit local residents, tourists and investors. The emerging place plan for Chepstow should be used as an input to the overall RLDP strategy for the town, rather than being a subservient consideration.

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on)

Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

It is essential that there be full consultation on proposals to revise policy LC6 on green wedges, taking into account potential green belt policy emerging through Future Wales 2040. The green gaps to the west of Chepstow, separating the town from the villages of Pwllmeyric and Mathern (and separating those two villages) are essential to the setting of the town, to the setting of the AONB, and as a national gateway to Wales – as well as having intrinsic importance as BMV agricultural land and as historic parks and gardens. An integrated approach needs to be taken to Chepstow and its surroundings as a whole, and in particular to the town and its relationship to the areas immediately to the west.

Any other Comments

Do you have any other comments on the Preferred Strategy?

No comment

Welsh Language

We would like to know your views on the effects that the proposals would have on 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?

No comment

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

No comment

Initial Integrated Sustainability Appraisal

Do you have any comments on the Initial Integrated Sustainability Appraisal Report?

Our comments are broadly incorporated into earlier comments.

It is difficult to understand how the ISA can adequately assess and reach conclusions on preferred options when so many of the impacts are classified as 'uncertain'. At what point do these become certain, quantifiable and measurable, and what level of rebalancing of the various factors listed will then be required?

The selected growth and future development options are inevitably biased towards economic and housing factors since most of the uncertainties relate to environmental, ecological, landscape and even climate change issues. Para 6.9, for example, says there is no evidence to conclude that high levels of growth would result in significant biodiversity/geodiversity, the landscape and historic environment. As we know, absence of evidence is not evidence of absence.

In May 2019 Monmouthshire County Council declared a climate emergency. Most of the appraisal of the growth options seems to relate to flooding. It is unclear how a proper climate change assessment can be carried out in the absence of detailed traffic and transport assessments.

We are particularly concerned about the inadequate regard placed in the ISA (para 9.25 onwards), to the importance of addressing Chepstow's issues in the context of not only Monmouthshire but also the Forest of Dean. In particular, road traffic from the southern part of the Forest of Dean to the motorway system inevitably passes through the central part of Chepstow, with seriously detrimental impacts on the town's environment and economy. Cross-boundary discussions with the Forest of Dean and Gloucestershire authorities need to be improved, so that a genuinely strategic approach and new initiatives can be taken towards the environmental and infrastructure issues affecting Chepstow.

There seems to be a numerical error in paras 5.10-12, as the figures for the changing numbers of options considered – from 8 originally, to 4 now - do not appear to match up.

Habitat Regulations Assessment

Do you have any comments on the Habitats Regulations Assessment?

No comment

Please note that due to the Covid-19 pandemic the Planning Policy Team are all working from home. Therefore, to assist with the efficient processing of responses we would encourage you to submit your comments via email to: planningpolicy@monmouthshire.gov.uk. If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 31 August 2021**.

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

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

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. ✓

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. ✓