

ABERGAVENNY TOWN COUNCIL

TOWN MAYOR

CLLR TONY KONIECZNY



TOWN CLERK

JANE LEE
TOWN HALL
CROSS STREET
ABERGAVENNY
NP7 5HD
Telephone: (01873) 735820

2nd August 2019

Rachel Lewis
Planning Policy Team
Monmouthshire County Council
County Hall
Usk

Dear Rachel

RESPONSE TO THE GROWTH & SPATIAL OPTIONS PAPER JUNE 2019

Thank you for the opportunity to comment on the above paper. Abergavenny Town Council has considered the contents of the Options Paper and these comments have been informed by discussions at Abergavenny Town Council Planning Committee on 17th July and through attendance at the presentation by Mark Hand, Head of Planning, Housing & Place-Shaping on Thursday 1st August.

Going forward, the Town Council would be willing to facilitate further workshops with a wider invitation to other interested organisations and individuals. We hope that representatives from MCC Planning Policy will be able to continue to engage as the Town Council and other organisations would like the opportunity to add to the debate on the LDP policies around zero carbon, self-build, section 106 and encouraging small & medium building companies.

We offer the following general observations:

- The conclusions reached in the 'traffic light' tables are very subjective and almost meaningless at this juncture in the plan development. We would question how an option that is likely to result in development in areas which have floodplains can be coloured coded green (helps to achieve the objective) on the basis that developments can be located away from areas at risk? Without being site specific this is a very broad assumption and should at the very least be colour coded amber. Equally how can an assessment of impact on infrastructure result in the statement 'Appropriate infrastructure could be provided to accommodate any new development', when in reality developers argue for years over the detail in section 106 agreements trying to increase site abnormalities and produce evidence that the site would not be viable if the figure for such associated development such as infrastructure is fixed at too high a level. Again, such

broad assumptions add little to the analysis at this time other than to evidence that MCC is considering the Wellbeing of Future Generations Act.

- We understand that there is limited progress with a Strategic Development Plan for South East Wales. This is disappointing as it would be advantageous for many of the issues regarding the level of growth and spatial options to be considering constraints and opportunities in neighbouring authorities rather than be constrained by the boundaries of Monmouthshire. We pose the question whether it would be feasible to consider neighbouring authorities taking some of the growth during the preparation of this LDP?
- If public authorities are serious about taking action to eliminate further human contribution to climate change, enormous efforts need to be made at every level. The LDP needs to set out the leadership MCC intends to show and the contribution it expects from its residents if the challenge is to be met. Climate policy should not be an add on.

We offer more specific comments on the options:

- The Town Council does not consider that adequate consideration has been given to how declining population forecasts impact specifically on settlements in Monmouthshire which has a higher proportion of older people than the Wales average? This scenario could result in more dwellings (some substantial and capable of being split into multiple occupation) becoming available as the older generation pass away so is there a need for all the new homes that are being forecast?
- The Town Council is opposed to higher growth strategies that justify many more new houses on the basis that they will encourage job growth, help to meet the need for more affordable housing or improve the age structure of the population. The report offers little evidence other than aspiration that the jobs can be created within the county. Pursuing these high growth strategies could be potentially damaging to the character of the county and detrimental to areas that should be protected. Once these areas have been developed, the character of the area changes dramatically.
- In terms of the protection of areas, there is little mention in the report about the impact of growth on areas that should be protected. The 'traffic light' tables consider heritage and environment impact but there is little reference in the body of the text. The need to protect areas should be a key driver in the spatial distribution of growth.
- Welsh Government is seeking to reduce the need to travel and to increase active travel journeys. Some options in the report aim to reduce the county's excess of out-commuting over in-commuting to the 2001 level, but they say nothing about reducing commuting within the county. Jobs must be brought nearer to homes or most homes must be near job opportunities (or served by high quality public transport to jobs). We believe most new housing should be in the south of the county where job creation prospects seem greatest and public transport will benefit from Metro and other investments.
- Option 3 and Option 4 of the spatial options include distributing growth in rural and secondary settlements. Unless more can be done to encourage and support small and medium size housebuilders to enter this sector, it is unlikely that small sites will be developed. Therefore the deliverability of these options and ultimately the plan is questionable.

- The town of Abergavenny which in this context includes Llanfoist and Mardy has experienced significant residential development in recent years. This has put significant pressure on associated services and infrastructure. The continuation of focusing growth in the main towns (ie Abergavenny, Monmouth and Chepstow) is not supported in the replacement LDP.
- Growth in North Monmouthshire area is limited due to parts of the area covered by the BBNPA whilst other areas are visually sensitive due to their proximity to the BBNPA boundary.
- For reasons above, the preferred spatial option is Option 5 Focus on M4 corridor.
- In terms of growth options, we would not support options 1 & 2 that would see Monmouthshire's communities decline.
- The report notes that Option 3 would represent a continuation of past dwelling completion dates and would not seek to address the demographic and economic challenges that MCC is seeking to address and doesn't take account of MCC's ambitions or aspirations. We can understand this viewpoint; however the evidence on higher growth rates given the current economic and environmental uncertainties is unconvincing. Pursuing higher growth rates to satisfy ideology that the area and council must be ambitious is considered a risky strategy with the current uncertainties. For this reason, the Town Council does not wish to see options promoting higher growth rates pursued at the current time. It may be appropriate at the first review of the replacement LDP to revisit growth options.

Please let me know if you require any further information on any of the points set out above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Lee', written in a cursive style.

Jane Lee
Town Clerk

