



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)
Title:	Mrs	
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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?

Although the Council has declared a Climate Emergency, the assumptions in its key issues seem to be very much 'business as usual'. The plan needs to take on board the challenges that are arising from extreme weather events, as well as a need for rapid carbon reduction, and the challenges of stemming biodiversity loss in the county.

The Council's economic development ambition is challenging but we have concerns that it is aspirational rather than deliverable. The development plan should be a key enabler to deliver the economic development ambition with explicit policies rather than an underlying assertion that it will be delivered on the back of the growth policies proposed in the RLDP.

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?

The strategy relies on the dated belief that the more growth you achieve the more you achieve your objectives. The necessary consumption of resources to achieve that growth is no longer considered sustainable, and even if the belief is accepted, success would rely on all the elements being in place at the same time. In this case that means the concurrence of extra housing (market and affordable), the extra jobs, and the extra infrastructure, without all of these being present the county's settlements may be less sustainable and resilient than they are now. A strategy that relies primarily on maintaining a rate of housebuilding that is more than twice the rate of the past fifteen years in the belief that a 'matching' number of jobs will materialise in the right places is especially risky at a time when the economic, environmental, and social future is extremely uncertain.

The number of houses planned to be built is far more than is required for the needs of the existing population. The past performance of the Council is lamentable in ensuring that developer-led housing addresses the housing affordability crisis. There is a significant risk that housebuilding on the scale proposed will change the character of our town, reduce its attractiveness, and overstretch its infrastructure in terms of traffic and drainage infrastructure and community infrastructure with detriment to quality of life and sustainability objectives.

Although we acknowledge that this isn't in scope, we would prefer to see a commitment to Council housebuilding for affordable rent and shared ownership as the primary development route for new homes, and not more developer-led and car dominated estates on the edges of our towns, outside the price reach of most people who work locally, and out of easy walking reach of the town centre. The focus on '20-minute neighbourhoods' is welcome. Given the topography of Abergavenny, some of the candidate sites proposed would fail this test, being beyond 20 minutes easy walk to shops, for instance.

There is no detail as to how the RLDP proposes to deliver the 7215 jobs referred to, particularly if they are to be jobs which are sustainable, green, skilled and well paid. We would like to see specific policies encouraging (and allocating sites for)

High tech industries and bioscience

Creative industries including film

Encouragement of horticulture and local food networks

Live and work homes

The Town Council supports the Welsh Government Town Centre First policy and would advocate that any additional retail should first and foremost be located in the town centre rather than out of town retail development. This will ensure the long-term sustainability of the town centre of Abergavenny.

There is a contradiction between the assumption that more people will work from home and require local services, which are found in the towns and not in the villages. We would welcome strategic growth in larger villages, which could increase the services on offer such as retail and public transport and sustain existing services such as shops, schools and public houses. This would be preferable to edge of town development in the main towns in Monmouthshire and in the case of Abergavenny would ease pressure on the current and planned infrastructure which is already at capacity.

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?

Policy S1 in effect restates the council's preference for Growth Option 5 in the consultation earlier this year. We objected to that preference and continue to do so. There is little evidence to suggest that the preferred growth strategy option 5 would deliver more affordable housing, improve the age structure of the population, and guarantee the employment required to sustain this level of growth.

We do not agree with the council's opinion that this level of growth is in general conformity with Future Wales 2040. On a pro rata basis FW2040 says that SE Wales will need about 50,000 extra homes by 2033. It is not clear whether that figure relates to a period starting in 2018 or whether it includes a flexibility allowance, but MCC's Preferred Strategy would mean that 16-18% of the regional need would be in a county that has about 6% of the region's population and is characterised as rural. This level of growth is in contradiction to the rural area designation, and for Abergavenny (inc Llanfoist) specifically, where the highest percentage of residential growth in the county is being proposed at 23% of all growth equating to 1,893 homes.

We note that the 7,215 jobs are expected to be spread widely between sectors including construction, retailing, tourism, professional etc services and health and social work, rather than manufacturing, and agree that is likely, though not on such a scale. We also suggest that many of these jobs will be low paid and will exacerbate the current difficulties faced by young people in becoming homeowners given that Monmouthshire has an average house price significantly above the Welsh average.

We believe that the demographic problem of the missing generation (20 – 40-year-olds) is outside the influence and control of MCC. In common with most towns and rural areas in the UK, Monmouthshire sees half its young people go away to cities and large towns for their university education. This residential pattern of higher education is a peculiarly British phenomenon but not one MCC can change. Most graduates choose to stay on, attracted by the better job prospects and more progressive social attitudes they find there, which outweigh the housing problems. The non-graduates of the missing generation remain in this area but rent or buy in neighbouring authority areas where prices are lower. It is hard to see how private developers could build houses of any quality in Monmouthshire at a price to compete with these.

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?

The RLDP has not addressed how the proposed development will be phosphate neutral which could render the LDP undeliverable and question its soundness. We note that the greater part of the protected catchment areas of the rivers Wye & Usk fall within the county of Monmouthshire. We also note with interest that the BBNPA has suspended work on the RLDP for 12 months subject to receiving greater clarity on the impact of the phosphate issue on RLDP proposals.

Previously, Abergavenny Town Council has promoted growth in the south of the county, and we still hold the view that there should be a shift of a substantial proportion of the growth proposed in the north towards the south of the county and close to the Newport and Torfaen boundaries bringing it into the area of economic focus of the Cardiff Capital Region.

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.

Abergavenny and Llanfoist

In the context of our continuing opposition to Policy S1 growth, we continue to see no need for substantial new allocations of housing land in the Abergavenny area – certainly not on the scale implied in Strategic Growth Areas. Completions 2018-2021, commitments and rollover, small sites and windfalls could provide about a thousand homes, an increase of around 10% on the present stock, but we acknowledge that some may not materialise and that the need for affordable homes may justify one or more small new sites where 50% or more affordable provision will contribute to that need. Some candidate sites outside the Strategic Growth Areas might then be acceptable to us.

Growth Area A: We support the proposal by Abergavenny & District Civic Society and others for a green wedge in the north of the county between the development area and the National Park boundary. This area has been protected for decades and is justified in the interests of the setting of the National Park on landscape grounds. Growth Area A is less suitable for housing than the other growth areas proposed due to the topography. Active travel is difficult given the steepness of the hills and this area is furthest from the bus and train station making increased car use inevitable.

Growth Area B: Proposed for mixed development, this 65ha site is larger than the needs of Abergavenny by 2033 under any strategy. Development here breaches the long-standing A465/railway barrier to the town's growth. At some time in the future the needs of Abergavenny may justify housing east of A465 and an employment site, or sites, could be sympathetically considered now. Whether a substantial housing allocation is needed in this replacement plan depends greatly on the final growth strategy. There will be significant infrastructure costs in developing the area east of the A465.

Growth Area C: Llanfoist has absorbed a significant level of development in recent years and future growth is not supported. The existing growth has put significant pressure on associated services and infrastructure in Abergavenny as there has not been commensurate growth in community infrastructure in Llanfoist, so residents seek services such as dentists, doctors, community activity etc in Abergavenny.

**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?

S3 Sustainable Placemaking and High Quality design

We welcome an overarching Placemaking and Design policy but feel the wording should be stronger and we would prefer 'development must' to 'should'. The policy requires stronger and clearer definitions on what is required by high quality design.

While we welcome Policy S18 and commend MCC for its recognition of the importance of Green Infrastructure, it is disappointing not to see a comparable strategic policy for maintaining, protecting and enhancing the built fabric of the county, especially the heritage features. The overarching Policy S3 refers to both GI and the built environment, but only the former is supported by a further strategic policy.

S4 Climate Change

The serious issue of climate change should be a cross cutting theme throughout the RLDP rather than a specific strategic policy. This requirement to make a positive contribution is currently vague and unquantifiable. We would welcome specific measures and objectives to achieve a positive contribution to development that is carbon and phosphate neutral.

S5 Infrastructure Provision

We would like to see that the following "*Where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought*" is only agreed to in exceptional circumstances. Improvements to infrastructure are required with development. To this end we would ask that the policy is strengthened around on-site provision.

S6 Delivery of homes

The policy itself seems to add nothing to S1, to which we have already objected, though the subsequent text does contain some extra information

S7 Affordable homes

The target of 50% affordable housing on commercially developed sites is welcome, but Monmouthshire has a poor record of securing such a high proportion of affordable housing in its negotiations with national housebuilders. We note that Cardiff City Council is one of the latest to determine to build council homes (at least 2000) and urge MCC to follow suit.

The policy and its explanation are also not now specific about the types of tenure to be achieved. Past development has proved that building unnecessary market housing to achieve affordable housing has failed under the present LDP. We believe it will be extremely difficult for this proposed policy to achieve the 50% affordable housing.

The RLDP could promote self-building and we are disappointed that this policy makes no reference to the role of self-build housing in tackling affordable housing.

S8 Strategic Development Sites – no comment

S9 Gypsy Travellers – no comment

S10 Sustainable Transport

Improved sustainable transport is critical given the levels of growth being proposed. Sustainable transport should be one of the key pillars of the plan if climate change is to be addressed rather than a strategic policy. Should there be a hierarchy of policies of which sustainable transport would be a top priority? We note that the LDP tests of soundness require support of Wellbeing goals and National Planning Policy which promote increases in sustainable transport to improve air quality and health and would question whether this policy is sufficiently robust.

S11 Retail and Commercial Centres Hierarchy

We welcome the opportunity to review the development of Abergavenny town centre with the long-term view of ensuring the continued vibrancy and vitality of the town centre. The Town Council will welcome close liaison with MCC Planning on the preparation of a Place Plan at the appropriate time.

S12 Community and Recreation Facilities

The policy does not acknowledge the importance of allotments and community food growing and leisure gardening sites. Abergavenny has an under provision of allotment and growing space based on Monmouthshire's own guidance. Sites should be identified in addition to the Llanfoist site to meet demand.

We welcome the commitment that no site currently used for leisure and recreation purposes will be allowed to be built on. The King Henry VIII school site will be a key test of how leisure and recreational facilities for all ages can be provided without loss of amenity.

S13 Employment Sites provision

It is a particular concern that employment sites, especially in mixed use developments, will be released for other uses, including unnecessary housing, if not taken up within a few years. Therefore, the policy should seek to safeguard sites. This situation referred to above occurred in Llanfoist. The development of employment sites needs to go hand in hand with economic development activity to promote and encourage small and medium enterprises to occupy employment sites. Mill St industrial site and Station Enterprise Park are two good examples of successful employment sites occupied by small to medium enterprises.

S14 Rural Enterprise – no comment

S15 Visitor Economy

The visitor economy is of vital importance to the prosperity of Abergavenny. We would welcome allocations which bring more visitors to the town (while discouraging the conversion of residential properties to holiday lets) and an increase in facilities for camping and hostel-type accommodation. The appearance of the town from the A40 also needs improvement through consideration of aesthetic considerations of new developments as they appear to visitors.

S16 Sustainable Waste Management – no comment

S17 Minerals – no comment

S18 Green Infrastructure Landscape and Nature Conservation

We suggest that the policy itself should indicate that a net benefit for biodiversity will normally be required. We are aware of a GI strategy for Monmouthshire but to date there has been very little discussion with the Town Council on the strategy itself and implementation which continues to be disappointing. The Town Council would want protection from further development in the Gavenny corridor.

We have stated previously that there should be explicit allocations of areas for protection and landscape and nature conservation should be one of justifications for protection. Overall, we would welcome additional street tree planting, safeguarding of green spaces in the town and the creation of new wildlife corridors.

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?

Generally, yes although we consider that Policy SD2 could be strengthened at a time of Climate Emergency.

Any other Comments

Do you have any other comments on the Preferred Strategy?

The Appraisal does not address the basic question of whether accelerated growth is sustainable in the context of the Climate Emergency and Government zero-carbon targets, or even achievable. It also fails to consider the magnification of risk associated with this growth if the interdependent elements do not coincide

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 observations

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 observations

Initial Integrated Sustainability Appraisal

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

No observations

Habitat Regulations Assessment

Do you have any comments on the Habitats Regulations Assessment?

No observations

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.