



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 **5th December 2022 to 30th January 2023**. 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 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.

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

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 us to understand the issues you raise.

Key Issues, Vision and Objectives (Paras 3.1 - 4.3 / Pages 10- 24)

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

The stated objectives are aspirational and are welcomed. We are not convinced by the evidence provided, that they are fully achievable within the existing statutory planning regulations and functions.

It is disappointing to see that Climate Crisis is relegated to objective 17 and we would like this to have been the principal objective overarching the RLDP.

Objective 9 seeks to manage the demographic issues within the County by providing opportunities of housing and employment for young people, the supporting evidence is not robust and remains largely aspirational.

Objective 10 refers only to affordable housing without reference to meeting net zero carbon for all new developments. Clearer definition of how “net zero carbon ready” is to be made achievable would be welcomed.

The emphasis on residential development with insufficient employment land allocation is of deep concern.

The reduction in the number of houses to be built and the consequent lowering of employment targets are broadly welcomed. The overall strategy remains ambitious and may still be unacceptable to Welsh Government in regard to the Strategic Development Plan Future Wales 2040.

Preferred Strategy (Paras 4.4- 4.8 / Pages 25-27)

Do you have any comments on the Preferred Strategy?

In August 2021 we strongly opposed the levels of housebuilding growth proposed in the first Preferred Strategy, especially as we saw little evidence that the number of new jobs would be provided in the county would be high enough to prevent increased unsustainable commuting. The second Preferred Strategy is the outcome of discussions with Welsh Government, though not necessarily endorsed by the government. We are pleased that the council has found reasons to accept a compromise that in housing growth terms appears to be approximately halfway between the 2021 position of the two main parties. We remain unconvinced about aspects of the strategy and unable to give it unqualified support. A risk remains that the extra housing (market and affordable), the zero carbon objectives, the extra jobs, and the extra infrastructure will not be in place in parallel and therefore that the county’s settlements will be less sustainable and resilient than they are now. We also need to be convinced that the laudable aim of securing a much higher proportion of affordable housing can be delivered, and therefore fear an unnecessary provision of market housing. We also continue to doubt whether the strategy will significantly improve the county’s demography as much as hoped.

Strategic Policies S1 – Growth Strategy (Paras 4.9- 4.26 / Pages 27-32)

Do you have any comments on Strategic Policy S1 – Growth Strategy

There are significant reasons for concern with the ability of the RLDP to meet the aspirational targets for growth. We have entered a period of global uncertainty, there is negligible economic growth, a climate crisis, a cost-of-living crisis, all of which provide barriers and constraints to achieving the objectives of the preferred strategy.

There is a lack of robust evidence that Monmouthshire has realistic prospects of attracting 6,240 additional jobs to accompany the proposed extra housing. The risk remains that without the provision to both attract and provide adequate opportunities for SMEs to find premises fit for purpose, the existing level of commuting out of the County will not diminish and more likely increase.

We note that the level of growth is not in conformity with Future Wales 2040 and the level of growth proposed is twice the amount for a County which has only 6% of the population of the SDP region.

The problems of phosphate pollution have severely curtailed any development within the Wye Valley and enabled the Council to modify its original strategy. There is uncertainty surrounding the timescale of resolving the phosphate constraints which will have impacts on the allocation of candidate sites around permitted settlements.

The assertion that the preferred strategy will be able to rebalance the demographic of the County is not supported with compelling evidence that is achievable.

We fully endorse the proposal to create 50% affordable homes, how will this be delivered? There remains the risk that market housing will dominate the provision in the proposed settlement allocations.

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.27 - 4.35 / Pages 33 - 40)

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

In the absence of more information on the suitability and viability of candidate sites and the capacity for the settlements infrastructure to absorb growth consistent with “sustainable and resilient” objective means that any strategy for spatial distribution is, at this stage, speculative.

The balance between the creation of housing and employment opportunities is crucial and the scale of any development needs to demonstrate sustainability and improve resilience.

We note that the strategy proposes a 24% share of the total allocation for Abergavenny/Llanfoist. We question the proposed time scale for addressing the issues of phosphate treatment for the area and the impact it will have on delaying the delivery of the RLDP.

Previously we had recommended that a higher level of development was achievable in the south of the County around the M4 corridor, we remain of that view.

Strategic Policy S7 – Preferred Strategic Site Allocations
(Please State which Preferred Strategic Site Allocation you are commenting on)
(Paras 5.32 - 5.36 / Pages 56- 59)

Do you have any comments on the Preferred Strategic Site Allocations?

We endorse the provision CSP001 CSP002, CSP003 and CSP004 to maintain an effective green wedge between the urban boundary and the BBNP boundary.

We endorse CS0266, CS0286 as candidate sites for employment. These small sites are insufficient to support the additional employment that will be required to viably accommodate an increase in residential allocation.

CS0213 East Abergavenny. We accept the potential to provide a mixed development on this site of up to 700 homes. Approval would only be forthcoming with guarantees that the considerable infrastructure challenges were fully scoped and costed and deliverable. We accept that this would be a phased development and therefore require its own strategic development plan to ensure that it does not become an isolated housing estate, especially if 50% affordable housing is achieved.

Other Strategic Policies (Please State which Strategic Policy you are commenting on)
(Paras 5.1-5.123 / Pages 41-98)

Do you have any comments on the Strategic policies?

We remain disappointed in the lack of inclusion of the LDP for the provision of Green Belt/Green Wedges to effectively manage urban form and preserve and enhance biodiversity.

There is no cross reference to the MCC Green Infrastructure Plan which has established a network of urban green and blue corridors within Abergavenny and in particular the valley of the River Gavenny.

S3 Whilst we welcome the proposals for place making and the prominence given to Green Infrastructure in design considerations, it is disappointing that there is no commitment for future development to build to net zero carbon to meet the declared climate crisis objectives.

S4 This policy appears to define carbon net zero by relying heavily on reducing CO2 emissions and a reliance on renewable energy. There is little reference to building design or recommendations for low energy solutions to facilitate the reduction in emission for

residential developments.

S6 We welcome the commitment to provide up to 1850 affordable homes by 2033. In the context of East Abergavenny we reiterate our concerns expressed in our comments on the proposed candidate site.

S10 We welcome this policy, Abergavenny Town Council is keen to work with the County Council on all issues concerning town centre planning, Placemaking under the Transforming Towns programme and eventually Place plans to deliver SPG to the LDP.

S11 Allocation for land for allotments and community growing projects would be welcomed by Abergavenny Town Council.

S12 We support this policy but are concerned at the low concentration of employment candidate sites for the Abergavenny/Llanfoist area. We reiterate our concerns that increased residential development must take place in parallel with the development of economic and employment growth and the provision of sustainable infrastructure.

S14 We understand the importance of tourism to the economy of Abergavenny and the wider hinterland. We support this policy and look forward to developing our Placemaking plans in partnership with the County Council.

S17 We fully endorse this policy. It is disappointing that there is no mention of creating green belt/green wedges when allocating candidate sites. Inclusion of this policy would strengthen the achievability of this proposed strategy.

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on) (Appendix 7 Pages 136-147)

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

We are largely in agreement with the existing LDP policies and make the following observations:

RET1 and **RET2** policies need to be consistent with Placemaking Strategies proposed under **S10**

LC6 should be fully adopted and incorporated in the RLDP to meet **S17** policy.

SD1 and **SD2** needs greater commitment to deliver this policy in the RLDP to meet **S17** policy.

MV4 relates to leisure cycling and should cover all aspects of Active Travel.

Any other Comments

Do you have any other comments on the Preferred Strategy?

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?

Abergavenny Town Council supports the development of affordable housing sites to encourage younger demographics benefiting from Welsh Education by attending the local Welsh Primary School to stay in the area. This helps to protect and enhance the Welsh Speaking demographic to remain and grow in Abergavenny.

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 (separate document)

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

We are broadly in agreement with the contents of the report.
We would welcome greater emphasis on promoting net zero carbon targets for any new development. Promotion of schemes to encourage energy self-sufficiency through the wider provision of renewable sources would make a significant contribution to a sustainable future.

Habitats Regulations Assessment (separate document)

Do you have any comments on the Habitats Regulations Assessment?

No comment.

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 30th January 2023**.

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.