

ABERGAVENNY TOWN COUNCIL

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28th January 2021

Rachel Lewis
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Dear Rachel

RESPONSE TO THE REVISED GROWTH & SPATIAL OPTIONS PAPER DECEMBER 2020

Thank you for the opportunity to comment on the above paper. Abergavenny Town Council has considered the contents of the revised Options Paper and offers the following comments. You will note that they do not differ significantly from the comments sent to you in August last year as the Town Council does not consider that MCC has significantly amended its proposals in light of the new evidence and implications for planning for a county post coronavirus.

We offer the following general observations on the paper:

- 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.

- 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. We consider the strategy for such ambitious housebuilding (most probably by the big housebuilders) to be contrary to climate change mitigation.

We offer more specific comments on the options set out in the paper:

- The Town Council does not consider that adequate consideration has been given to how declining population forecasts impact specifically on settlements in Monmouthshire which have higher proportions of older people than the Wales average. How has the situation of existing dwellings been factored into the modelling? In Abergavenny, some substantial dwellings capable of being split into multiple occupation could become available as the older generation passes away so this raises the question on whether there is the need for all the new homes that are being proposed. Isn't it more sustainable to look at existing housing stock as part of the solution rather than always looking at new build?
- The Town Council is opposed to higher growth strategies predicated on more houses equals more jobs. There is little evidence to suggest that the preferred growth strategy option 5 would deliver more affordable housing or improve the age structure of the population. The report offers little evidence other than an aspiration that the jobs can be created within the county. What is the track record to date of attracting significant new employment to Monmouthshire? 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.
- Growth Option 2 would represent a similar dwelling completion rate to that that has been achieved in recent years in contrast to the overly ambitious dwelling completion rates required for option 5. The Town Council does not agree with such unrealistic aspirations although we can appreciate why MCC is promoting such an option. We are of the opinion that 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 **and therefore Option 2 is our preferred growth option**. It may be appropriate at the first review of the replacement LDP to revisit growth options.
- 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.

- With regards spatial options. Option 2 suggests distributing growth in sustainable settlements which haven't yet been identified. 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 so the focus will again be on the main towns which in effect is option 1. Addressing this lack of small and medium housebuilders is outside the control and influence of MCC therefore the deliverability of this option and ultimately the plan is extremely 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) or in the north of the County is not supported in the replacement LDP for the arguments set out in your report.
- 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 3 Focus on M4 corridor**. The negative impacts are considered to be overstated as mitigation measures can be put in place eg "less of a focus on the main County Towns of Abergavenny, Chepstow and Monmouth, which would have a detrimental impact on the retail centres in these areas" can be addressed through other policies which encourage increased visitor spend, improving marketing and branding etc.

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

Yours sincerely



Jane Lee
Town Clerk