

## FULL COUNCIL 14<sup>TH</sup> JULY 2021

### RLDP PREFERRED STRATEGY

#### 1. PURPOSE OF THIS REPORT

- 1.1 To receive details of the RLDP Preferred Strategy consultation and approve the setting up of a working group.

#### 2. BACKGROUND

- 2.1 MCC has reached the Preferred Strategy stage of the RLDP process which is the first statutory consultation stage in the Plan preparation process. The Preferred Strategy provides the strategic direction for the development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) over the Plan period 2018 to 2033 and identifies how much growth is needed and where this growth will broadly be located. It represents the completion of a period of Pre-Deposit Plan preparation and engagement, the outcome of which has had a clear influence over the selection of the Preferred Strategy. The Preferred Strategy can be viewed by clicking on this [link](#)
- 2.2 The overall aim of the Preferred Strategy is to:
- Identify key issues, challenges and opportunities for the County
  - Develop a Vision and set of Objectives for the RLDP that respond to the key issues, challenges and opportunities
  - Set out the preferred level of growth (housing and employment) and broad spatial distribution of this growth
  - Set out the Strategic Policies that will deliver/implement the Strategy
- 2.3 What is NOT included in the Preferred Strategy?
- Site allocation, designations and defined settlement boundaries – these will be identified in the Deposit Plan.
  - Detailed Development Management policies – these will be included in the Deposit Plan.
  - A detailed evaluation of candidate sites. The Preferred Strategy is accompanied by a background paper that identifies those candidate sites that broadly accord with the Strategy. In accordance with our Delivery Agreement, a second call for candidate sites will take place alongside consultation on the Preferred Strategy. A detailed assessment of all candidate sites will be published alongside the Deposit RLDP.
- 2.4 In January 2021, the Town Council responded to the Growth & Spatial Options consultation which can be found in Appendix 1. The Growth & Spatial Options work informed the Preferred Strategy.
- #### 3. DETAIL OF THE PREFERRED STRATEGY
- 3.1 The Preferred Strategy is subject to statutory consultation with a closing date of 31<sup>st</sup> August 2021.

### 3.2 The Preferred Strategy will:

- **Make provision for a total of 8,366 homes to deliver a housing requirement of 7,605 homes** (The Preferred Strategy states *“It is recognised that in order to create sustainable and resilient communities we must seek to achieve a more balanced age structure and enable those people who are currently unable to afford to buy or rent a home to remain in the County. The Preferred Growth Strategy assists in addressing these key demographic and affordability challenges.”*)
- **Provide the planning policy framework to enable the provision of 7,215 additional jobs** (The Preferred Strategy states *“the RLDP is underpinned by a level of growth that seeks to address the issues currently impacting on economic growth such as a shrinking working age population and high levels of out commuting”*)
- **Address economic growth and resilience within the County through the provision of a sufficient range and choice of employment land** (The Preferred Strategy states *“sustainable economic growth that will help reduce levels of commuting and promote self-contained communities, ensuring the environmental and economic sustainability of our communities. This will be achieved by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council’s Economic Growth and Ambition Statement, Investment Prospectus 52 Monmouthshire Replacement Local Development Plan Preferred Strategy June 2021 and climate emergency declaration, maximising opportunities from Cardiff Capital Region City Deal, targeting growth in key economic sectors and providing appropriate employment land in the right locations”*)
- **Distribute growth proportionately across the County’s most sustainable settlements** (The Preferred Strategy states *“Spatial Option 2 - Distribute Growth Proportionately across the County’s most Sustainable Settlements – remains the Council’s preferred Spatial Option.”*)

3.2 For Abergavenny (inc Llanfoist), this means the highest %age of residential growth in the county at 23% of all growth equating to 1,893 homes. Although with existing permissions that haven’t built out this reduces to 1,324. Proposed areas for settlement expansion are Land north of Abergavenny, Land to the east of the A465 and Land between the B4246 (Page 89 and Page 161-163)

3.3 A comprehensive set of strategic policies are included in the RLDP on design, infrastructure, homes, community & recreation facilities etc together with evidence to support the proposed policies.

## 4. TOWN COUNCIL RESPONSE

4.1 Many of the comments offered at the Growth & Spatial Options consultation still apply and are set out again for consideration:

- 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 policies

and evidence set out Preferred Strategy do allay concerns that adequate associated services and infrastructure will be forthcoming.

- 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.
- The Town Council is opposed to higher growth strategies predicated on more houses equals more jobs. The Town Council considers the proposed job figures to be unrealistic.
- 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

4.2 Councillors are requested to offer additional comments on the strategic policies, particularly on those related to climate change. Previously the Town Council has commented that “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”, therefore there should be a comment on whether the strategic policies meet the challenge.

## **5. RECOMMENDATIONS**

5.1 It is recommended that a working group, chaired by Cllr Konieczny, Chair of the Environment Committee is set up to prepare the Town Council’s response. (The response is to be agreed with the Mayor as there is no Council meeting scheduled in August)

## APPENDIX 1

### 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

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

**Jane Lee**  
**Town Clerk**

