**MONMOUTHSHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN 2018-2033 (DEPOSIT PLAN) – A Civic Society Response?**

**The County Council is now consulting on the Replacement Local Development Plan (the Deposit Plan) [**[**Monmouthshire Replacement Local Development Plan (RLDP) Consultation 2024  - Monmouthshire**](https://www.monmouthshire.gov.uk/rldp-consultation-2024/)**]. They will consider representations (to be made by 16 December) and submit the plan for independent examination by an Inspector who will decide what changes are needed before it is adopted. THIS IS PROBABLY OUR LAST CHANCE TO INFLUENCE A PLAN THAT WILL SHAPE THE DEVELOPMENT OF THE COUNTY AND ABERGAVENNY UNTIL 2033.**

**Background**

In 2020 the previous Council consulted on a preferred strategy to provide for 8,322 extra homes across the county 2018-2033 (averaging 550 pa) plus 4,695 extra jobs. Consultation was halted by Covid and in mid-2021 there was consultation on an updated 2020 preferred strategy – now 8,366 homes and 7,215 jobs. The Society regretted that little change had been made to the planned scale of growth despite significant changes in the context, including a draft Welsh Government Future Wales national strategy. An extensive Society response objected strongly due to conflict with Future Wales, fears of increased commuting to jobs outside the county by car and unrealistic local economic growth ambitions. We suggested an average annual housebuilding rate of about 300. Welsh Government made similar representations, suggesting that about 4,700 extra homes would be sufficient.

In late 2022 a new County Council consulted on a preferred strategy for 5,940 extra homes (396 pa) and 6,240 extra jobs. The Society welcomed the reduction of the housing target but would have preferred it to be about 5,250 (350 pa) and restated its concerns about the unrealistically high job creation target. This time the Welsh Government accepted the proposed housing growth, especially the provision for affordable housing (also welcomed by the Society). In October 2023 the Council agreed a strategy with an amended figure of 6,210 homes to provide extra flexibility in case some sites do not proceed as hoped. Our criticism that the Council never considered all representations before making its decision led to a May 2024 meeting with the Deputy Leader, but it was made clear that no significant change was likely as the strategy had been endorsed by Welsh Government. A response to 2023 representations would accompany the Deposit Plan, which it has (see below).

The Society has provisionally accepted that 500 new homes should be provided on the East Abergavenny site and that new sites for 100 be allocated elsewhere having regard to our representations for green wedges on the National Park boundary and in the Gavenny valley.

**The Deposit Plan**

The plan continues to provide for 6,210 extra homes (5,400 plus a 15% flexibility allowance that is arguably not sufficiently supported by evidence); up to 2,000 will be affordable. As there are currently approximately 4,080 homes already in the housing landbank (built since 2018 or permissible under the present Plan), land will be allocated for up to 2,130 new homes, including up to 1,065 new affordable homes. The plan will ‘support job growth of up to 6,240 additional jobs over the Plan period.’

Abergavenny and Llanfoist’s landbank totals 762 homes (537 built since 2018 plus 225 committed or estimated to be permissible within the present LDP) to which new sites for 600 will be added (500 at East Abergavenny).

**Despite our representations last year against the countywide housing growth provision, your Executive Committee now suggests that we do not object to the Deposit Plan housing figures.** Our reasons are:

(a) the housing provision is much lower than that in the 2021 Preferred Strategy and the Welsh Government has accepted the present Council’s compromise between those of the previous Council and the initial response of the Government;

(b) with a UK national target of over 300,000 new homes a year, it might be considered somewhat mean to pursue an objection to, at the most, a countywide average of 60 more per year than our objective of 350, especially having regard to c) below;

(c) on past evidence and considering economic uncertainties we doubt that the housing requirement will actually be achieved by 2033; nearly 4,000 homes would have to be completed in nine years, an average of 440 pa, a rate achieved only in four years this century. About 800 of these could be at Abergavenny/Llanfoist.

(d) a high proportion is intended to be social housing for those already living (and possibly working) in the county, though there is a risk that the proportion of affordable housing will not be achieved;

(e) our fears of extra unsustainable commuting by car to work out of the county may be mitigated by working from home, the growth of EV car use, job creation close to the county boundary (e.g. at Mamhilad) and public transport improvements close to new housing, as at East Abergavenny; and:

(f) we are broadly content with proposals for the Abergavenny area, which is the Society’s primary concern.

**Nevertheless, we need to continue our criticism of MCC’s ambition that up to 6,240 extra jobs will be created. This would mean an unprecedented extra 700 or so per annum between now and 2033. We believe that 3-4,000 are needed, and even this would be challenging. However, we do not object to the accompanying land use policies and proposals (apart from a severe disappointment at the very small land allocation for business use at Abergavenny – see below) and a representation will relate to the wording of paragraphs rather than policies.**

**The Initial Consultation Report**

This long report summarises the many representations received early in 2023 on the Preferred Strategy and the Council’s responses to these. The report could occasionally be criticised for inadequate summaries and responses, but matters of importance can now best be pursued via the forthcoming consultation and examination process, referring back to this report if necessary. **Nevertheless, it is our view the representations and responses to them should have been considered before the Preferred Strategy was endorsed by the Council in October 2023.**

**In More Detail**

As the Society proposed, a **Green Wedge** has been defined for protection from development on the National Park boundary west and south-west of Abergavenny/Llanfoist. However, the only proposed housing land allocation apart from East Abergavenny is a 6.17 ha site for **100 houses at Penlanlas Farm**, with access from Old Hereford Road. This proposal intrudes into the Green Wedge and extends building up to the 145m contour in an area where development is now below the 125m contour. For this reason and others, including noise from the electricity substation, **we plan to object to the Penlanlas Farm development.** When doing so we must recognise that other land for 100 homes is likely to be allocated, possibly including sites at Llanfoist where the Society has called for a period of restraint following many years of continuous housebuilding.

The Society’s proposal of a protective Green Wedge in the **Gavenny valley** is not included in the plan, but it is outside the Settlement Boundary, there are other protective designations in parts of the area and it does not satisfy Government policy guidance.

Less than two extra hectares are allocated for business use at Abergavenny/Llanfoist (at Nantgavenny Lane and within East Abergavenny. The countywide provision is 48 ha. **This low level of local provision will be the subject of a strong representation.** It is essential that the town can offer sites and/or premises for new and expanding businesses; other towns have such opportunities.

The **East Abergavenny** mixed-use site for 500 homes (50% affordable) is now 35.9 ha, the Monmouthshire Housing Association candidate site plus part of the Coldbrook Estate candidate site close to the station. An Indicative Masterplan needs critical study; connectivity with the rest of the town has been left with the developer to resolve to the satisfaction of the LPA, and development extends to the 120m contour, 10m higher than our preference. The Council’s Deputy Leader has implied that trunk road traffic will be slowed and light controlled pedestrian/cyclist crossings provided.

**While the layout of land uses can to some extent be decided after RLDP adoption, the Society has stressed that the very early provision of safe and easy active travel crossing(s) of A465 and the railway are a prerequisite for our approval of the RLDP.** **Leaving this and other important matters unresolved in the Deposit Plan is unsatisfactory and is contrary to Welsh Government guidance; the final Adopted Plan must be sound, well-planned, viable and deliverable.** At present the plan includes almost no costings. We are conscious that satisfactory crossing of the trunk road and railway is likely to be very costly and we will be suggesting that a commitment to a larger longer-term development may be a way of achieving viability. It would seem that the independent Inspector now has to address such deficiencies.

**Other Policies etc**

Subject to further study and the views of our members, the Deposit Plan policies for matters such as Placemaking and Design Quality, Climate Change and Net Zero Carbon Homes are considerable improvements on present policy, and will be broadly supported, while others are substantially unchanged.

A large amount of supporting documentation will also need to be checked for content that may need representations, but these are unlikely to be of substantial significance.

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