

Monmouthshire County Council LDP Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

We note that a SELF-ASSESSMENT based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix A of the preferred Strategy doc; LDP Manual 6.5.1)

P1 - Prepared in accordance with the Delivery Agreement including the CIS

<u>Comments</u>	<u>Suggested Actions</u>
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (Appendix A).	----

P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)

<u>Comments</u>	<u>Suggested Actions</u>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has been subject to SA/SEA: supporting documentation (Baker Associates) '<i>Initial Sustainability Appraisal (incorporating Strategic Environmental Assessment) Report</i> (May 2009), and a non-technical summary and <i>SA Scoping Report April 2008</i>; The Initial SA Report is subject of current consultation. <p>Habitats Appropriate Assessment (HRA): We note that:</p> <ul style="list-style-type: none"> - there are a number of Natura 2000 sites designated for their habitats and species which will need to be considered; - that HRA is being carried out throughout the production of the plan, and reported separately but parallel to this SA process; - that the Preferred Strategy will be screened against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultees. 	<p>It is vital that the authority is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations, has had regard to European Protected Species and that the deposit plan has had regard to the findings.</p>

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C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key relevant plans, policies and strategies:</p> <p>National: <i>WAG Sustainable Development Scheme (2004)</i> WSP People, Places, Futures'04 & '08Update (SE Wales Area – The Capital Network), PPW, MPPW, MIPPS, Circulars, TANs.</p> <p>Regional: Regional Housing Apportionment, SEW Regional Waste Plan (2004 and review Sept 2008), South Wales Regional Aggregates Technical Statement (Oct 2008), Regional Transport Plan (Dec 2008), Severn Estuary Strategy (2001).</p> <p>Local: Monmouthshire's Community Strategy 'Our Country, Our Future' 2008-2012 (Aug 2004) Health, Social Care and Well-being Strategy 2008-2011 (2008), Children and Young People's Plan 2008-2011, Local Housing Strategy for Monmouthshire 2007-2012, Local Biodiversity Action Plan 2005, Fresh Directions – Monmouthshire Economic Development Strategy and Action Plan 2004-2008, Wye Valley AONB Management Plan 2004-2009</p> <p>The Initial Sustainability Appraisal Report contains a review of the relevant plans, programmes and strategies (in its section 3)</p> <p>Relationships:</p> <p>Chapter 2 'Policy Framework' contains a section on 'regional collaboration and linkages with other local authorities' and provides details on the regional working that the authority is involved in. Reference is made to both neighbouring local planning authorities within South Wales and English Border authorities. The plans of the neighbouring authorities have been explained and their implications for significant cross border issues. The Brecon Beacons National Park's Preferred Strategy is noted in Monmouthshire's document as having significant cross border issues, as Abergavenny is a key settlement for the south eastern part of the National Park. The potential of proposals in Forest of Dean's Core Strategy are also noted.</p> <p>There is a need to consider not just neighbouring authorities' development plan strategies, but also the relationship between Monmouthshire and Newport, Cardiff and Bristol as this could impact on employment and commuting patterns. The proximity to these large urban areas could have an impact on the role and function of the authority and influence the strategy.</p>	<p>Demonstrate clearly how contextual strategies have collectively influenced the LDP strategy. This includes emerging strategies of key neighbouring LPAs.</p> <p>Consider the impact of not just neighbouring authorities' development plan strategies, but also those of Cardiff, Newport and Bristol and how these will impact the future role and function of the authority.</p>

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C2 It has regard to national policy.

Comments	Suggested Actions
<p>LDP Wales (and PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p>Review, refine or supplement the strategy and deposit plan proposals to implement national policy where appropriate.</p> <p>The deposit plan should have a clear statement on the application of national policy; it should also incorporate a form of notation that makes clear when national policy will apply.</p> <p><i>See comments under soundness tests CE1 & CE2</i></p>

C3 It has regard to the Wales Spatial Plan

Comments	Suggested Actions
<p>The LDP strategy is considered to be broadly in line with the Wales Spatial Plan.</p> <p>It recognises that two of the sub areas in the South East Wales Spatial Plan area are relevant to Monmouthshire – the connections corridor and the City Coastal zone. The Preferred Strategy should provide a framework to enable the two key settlements of Abergavenny and Chepstow to fulfil their strategic functions over the plan period.</p> <p>The authority wrongly assumes that the National Park area of Monmouth is not included in the south east Spatial Plan area.</p>	<p>----</p>

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C4 - Has regard to the relevant community strategy/ies.	
Comments	Suggested Actions
Page 10 identifies the Community Strategy, the corporate plan and other local plans and strategies which have a close relationship to the LDP. The self-assessment soundness test says that the LDP Preferred Strategy has been prepared in the context of the Community Strategy.	----
<p>CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities</p> <p>&</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</p>	
Comments	Suggested Actions
The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at chapters 4 to 6.	----
<p>25 key issues are identified. Following an overview of the profile of Monmouthshire in Chapter 3 which outlines the geographical context and reviews the environmental, social and economic characteristics of the area the key issues are identified in chapter 4. The key issues are identified under 5 headings 1) Building Sustainable Communities; 2) Promoting a Sustainable Economy; 3) Valuing our Environment; 4) Achieving Sustainable Accessibility; and 5) Respecting Distinctiveness. These headings were identified as part of the SA/SEA Scoping Report. Most issues summarised on pages 26 and 27 succinctly capture relevant land use issues that can be addressed by an LDP but a small number are descriptive without identifying a need for action.</p> <p>Chapter 6 description of the county's main towns (pages 40 – 45) would be more appropriately located within the discussion about key issues. The three distinct areas described at the top of page 41 appear to have distinct issues of their own that could have influenced the vision, objectives and preferred strategy, and made option</p>	Issues – Review the issues to ensure it is clear what action is required by the LDP, and consequently the monitoring framework, and also to identify the key issues of particular priority for the plan.

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selection clearer, avoiding a hybrid approach – see below comment on spatial options.	
The LDP vision (chapter 4) is supplemented by three areas of land use actions. These are essential to make the vision locally distinct with a spatial dimension and relevant to land use planning and therefore it should be made clear that they form an integral part of the vision.	Vision – Consider whether the vision needs redrafting to emphasise the locally distinct and land use elements.
15 LDP objectives are identified (Chapter 4, page 30). The Objectives are grouped around the main themes of the Wales Spatial Plan, which were also used to group the main key issues. There are clear links to the identified issues. They are distinct from the SA objectives (Initial SA Report page 25). Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered.	Consider developing into SMART objectives to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.
<p>Preferred strategy from strategic options: 3 potential growth options and 4 potential spatial options were considered (chapter 5) by the authority and during public consultation.</p> <p>The three growth options considered are;</p> <ol style="list-style-type: none"> 1) 'Environmental Capacity' option, 250 dwellings per annum. The term environmental capacity does not appear to be based on an environmental assessment of the capacity of the area, and the use of the term is confusing. Greater clarity about the range, priority and weighting of environmental 'constraints' in an assessment will be required. 2) 'Regional Collaboration' option, 350 dwellings per annum. Further explanation of how the regional apportionment figure was determined and how it relates to Monmouthshire should be supplied. 3) 'Market Led Growth' option 475 dwellings per annum. The environmental cost of pursuing this option should be examined. <p>It would have been beneficial if greater linkages could be made between the different options of housing growth and how they relate to the delivery of the issues identified within the County. Consideration could be given to the anticipated job growth over the plan period, delivery of infrastructure, commuting levels and connections, affordable housing delivery and environmental constraints.</p> <p>The Preferred Growth Option is option 2 the 'regional collaboration option of 350 dwellings per annum. This growth level was agreed as part of a regional apportionment exercise carried out by the 11 local authorities in the South East Wales Strategic Planning Group. The plan considers this level of growth to be achievable without too much harm to the environment and character of the County, and without prejudicing the regeneration ambitions of</p>	<p>Ensure preferred growth option is clear and supported by robust evidence showing how the regional apportionment figure was reached linked to the issues specific to your authority.</p> <p>Ensure that the preferred growth option can be delivered, is flexible to adapt to</p>

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<p>the neighbouring valley authorities. How this level of growth relates to the issues, the implication of which appears to be a low growth level, and the rationale behind this decision is unclear.</p> <p>The new projections show Monmouthshire having a greater need. The Assembly Government recently published its 2006-based household projections by local authority area (with data for National Parks identified separately). The household projections for Monmouthshire over the plan period 2006-2021 project an increase of 7,600 households. The preferred growth option would therefore result in a difference of 2,350 homes over the plan period that has not been clearly explained.</p>	<p>changing economic circumstances and is thoroughly evidenced. Deviations from the 2006 projections will need to be articulated along with the rationale for the apportionment. Clear evidence addressing linkages to the issues and any implications arising should also be presented.</p>
<p>The four considered spatial options which are:</p> <ul style="list-style-type: none"> A. Focus development within or adjoining the three main towns of Abergavenny, Chepstow and Monmouth where there is the best access to jobs, services and public transport. B. Focus development of the 'Severnside' area around the M4 corridor in an attempt to harness its strategic location to promote growth and achieve a 'critical mass' to boost public transport, employment, services and community facilities. C. Distribute development proportionately across rural and urban areas to meet housing needs evenly throughout the County, although focusing in rural areas on those small towns and main villages where there is a basic level of services and facilities. D. Focus development on sites and settlements where opportunities exist for large scale mixed development to enable new residential to be accompanied by an associated increase in employment opportunities. <p>The results of the written consultation on the spatial options indicated a preference for option C which is to distribute development proportionately across rural and urban areas to meet housing needs evenly throughout the County.</p> <p>The Preferred Spatial Option is a hybrid of the four considered options. The Preferred Strategy will aim to spread development around the County, while focus development on the locations that provide the best opportunities for sustainable development. An emphasis on three main towns of Abergavenny, Chepstow and Monmouth. Development opportunities at settlements in the Severnside region in the M4 corridor. Also provide development in the County's most rural areas.</p> <p>It is questionable whether it is possible to have a hybrid option and how sustainable this will be. The split of development between the urban and rural areas is not defined and therefore it is difficult to assess how the</p>	<p>Ensure that the selection of a preferred spatial option is clearly and firmly founded on robust evidence, and that the role of stakeholders in developing it is appropriate; and that it is clear in how it will achieve the plans objectives.</p> <p>Ensure that the spatial strategy is</p>

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<p>strategy will contribute to sustainable development within the County. It is not clear what the environmental and infrastructure constraints are for the main towns of Abergavenny, Chepstow and Monmouth. It is also unclear how development will be spread in the rural areas and how the growth will impact upon rural services and facilities, commuting and employment.</p> <p>The Proposed Settlement Hierarchy is not always clear. Magor/Undy is classified as a secondary settlement in chapter 6 (introduction) on page 40, but Policy S1 (page 46) has elevated Magor/Undy to the main settlements. Is Magor/Undy correctly justified as being a main settlement? The settlement hierarchy and its impact on the spatial strategy should be clear.</p>	<p>suitably supported by the SA.</p>
<p>Evidence – robust and credible: Background Studies / Evidence Base are referenced –</p> <ul style="list-style-type: none"> Urban housing potential study (July 2008) Employment sites and premises review (August 2008) Housing background paper (October 2008) Function and hierarchy of settlements study (October 2008) Open space study (December 2008) Strategic transport study (February 2009) Biodiversity assessment of potential candidate sites (February 2009) Strategic flood consequences assessment Stage 1 (March 2009) Landscape sensitivity and capacity study - Interim Report (May 2009) <p>Initial Sustainability Appraisal Report May 09</p> <p>We note that a number of studies in the evidence base are not yet completed or have not been made available with the PS documentation. We would draw attention in particular to being clear about:</p> <ul style="list-style-type: none"> - any regional apportionment of housing - that the viability and delivery of affordable housing provision is demonstrated - the landscape and environmental capacity of the area - the location of best and most versatile agricultural land quality - the location of sites vulnerable to flooding - minerals - waste - that the issue of infrastructure constraints and required solutions is fully detailed. 	<p>Ensure appropriate robust and credible evidence is available and its influence in developing and supporting the strategy is clear in the Deposit plan, including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy. It is important that there are suitable clearly referenced background papers to accompany the deposit plan.</p>

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<p>Clarification of how the site assessment process (through the candidate site methodology) will work is provided (appendix F). The methodology indicates assessment of all candidate sites of potential strategic significance. Strategic sites which accord with the Preferred Strategy and non strategic sites which merit further consideration will be assessed against the SA/SEA.</p>	<p>----</p>
<p>SPG - Reference is made (page 70) to intended preparation of SPG. Information on the SPG programme should be provided in the Deposit plan.</p>	<p>Information on the SPG programme should be provided in the deposit plan.</p>
<p>Agricultural land The plan does not show that the national policy towards the conservation of best and most versatile agricultural land (BMV, PPW para 2.8.1) has been taken into account in allocation of sites for development. In appendix G: assessment of potential strategic candidate sites – consideration is given to the loss of agricultural land in the schedule of assessment criteria, but no consideration has been given to the quality of the agricultural land. As the sites are currently assessed, only the site’s greenfield condition is taken into account.</p> <p>Four out of the five strategic housing sites are on Greenfield land. These sites are listed below with the agricultural land quality information that is currently available: Deri Road, Abergavenny – desk exercise indicating potential for BMV Crick Road, Portskewett – detailed survey grades 1 and 2 (BMV) Wonastow Road, Monmouth – no field information, but detailed survey on adjoining land grade 2 (BMV) Rockfield Farm, Undy – pre-revision reconnaissance survey grades 2 and 3a (BMV)</p> <p>The majority of Strategic Employment Sites in policy S7 need is taken up by existing sites or on previously developed land. However, the loss of BMV may be an issue if the Wonastow Road, Monmouth site is allocated for mixed use development - field studies need to be undertaken.</p>	<p>Ensure the deposit plan assess the agricultural land quality of development sites and directs development away from best and most versatile agricultural land. A clear assessment methodology, including the weighting of all factors, would aid understanding of how such sites have been considered and why certain issues have taken precedence. This also needs to reflect national planning policy.</p>
<p>Gypsies & Travellers Consideration and provision is required in accordance with WAG Circular 30/20007 and MIPPS 01/2006; including being based upon an Accommodation Needs Assessment of Gypsies Travellers (sections 225 and 226 of the Housing Act 2004). There is no reference made to the needs of Gypsy / Travellers.</p>	<p>Undertake an accommodation needs assessment of Gypsy and travellers within the County. Ensure appropriate site(s) are identified in the deposit plan (both permanent and transit) along with an appropriate criteria based policy.</p>

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<p>Employment (pages 58 & policy S7 & S8)</p> <p>It is noted that the Employment Land and Premises Review (Aug 2008) found that sufficient land was available to meet the County's needs until 2021. However, it identified an imbalance in the type and location of employment land genuinely available. It is unclear whether existing allocations have been reviewed to address this imbalance nor indeed whether the imbalance is significant in the context of existing commuting patterns and proposed location of housing growth.</p> <p>The first paragraph on page 58 of the Employment Land Review identified Abergavenny as 'having reasonable amounts of land', whilst Chepstow seemed to have a limited supply. The third paragraph under the heading (page 58) seems to contradict this by suggesting Abergavenny 'is short of land and premises' – the shortage is reaffirmed in the fifth paragraph. Conversely, there seems to be little coverage of Chepstow's limited supply of sites.</p> <p>With regard to the third bullet under the 2004-2008 Economic Development Strategy and Action Plan section on page 13, it makes reference to supporting business to start up. If this is still an aspect of the emerging economic strategy, it could be better reflected in terms of the range of site sizes discussed in the Promoting a Sustainable Economy section of the preferred strategy, starting on page 58.</p>	<p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.
<p>Historic Environment</p> <p>Page 19 states there are approximately 185 Scheduled Ancient Monuments. Cadw has informed us that there are currently 196 Scheduled Ancient Monuments in Monmouthshire.</p> <p>The Preferred Strategy has adequately identified an objective and policies to protect, enhance and manage the built environment.</p>	<p>To amend for deposit plan.</p>
<p>Housing</p> <p>Housing / affordable housing requirement - The Preferred Strategy requires 5,250 new dwellings to be built over the 15 year plan period (2006-2021), covering both market and affordable homes. The housing requirement of 5,250 dwellings is based on the South East Wales Regional Housing Apportionment figure and will continue past trends of growth and will limit the impact of development on the environment. Further evidence is required to support this chosen figure, as it is not clear how the apportionment figure relates to Monmouthshire and how the figure was determined. (PMP-MN)</p> <p>There is a concern that the housing provision number may be insufficient in relation to the evidence. Greater clarity on growth levels, issues and evidence is required.</p>	<p>The deposit LDP should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced in accordance with national policy; - include a robust affordable housing target; - provide threshold(s) to deliver affordable housing and clarify the reasons for them with suitable viability studies;

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<p>An affordable housing target of 1,300 affordable homes during the period 2011-2021 has been established in Policy S4 (page 55). To meet this need, the proportion of affordable dwellings on new sites would need to be 35%.</p> <p>It is encouraging that the plan is trying to meet the affordable housing need identified in the Local Housing Market Assessment. The Policy states that the provision will be met by a requirement on sites of 5 dwellings or more in the Main and Secondary Settlements for 35% of the total number of dwellings to be affordable. A requirement on development sites of 3 or more dwellings in the main villages for 80% of dwellings to be affordable. A requirement on unallocated windfall sites with a capacity for 2 dwellings that 50% be affordable.</p> <p>The affordable housing target needs to be supported by sufficient evidence and viability testing to show that the requirements are realistic and deliverable, especially during the economic downturn.</p> <p>The chosen growth option assumes an annual build rate of 250 dwellings per annum from 2006-2011 over the UDP period and 400 dwellings per annum from 2011 to 2021. There are no phasing proposals relating to the Preferred Growth Option. The authority should consider a phasing policy to ensure that development is spread throughout the Plan period and avoids the cherry-picking of easy to develop sites. It would also add a degree of flexibility to the plan and provides developers and infrastructure providers with sufficient certainty to make future investment decisions.</p>	<p>- clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.</p> <p>Consider whether a review of the growth options is required, to take account of the Welsh Assembly Government's 2006 based household projections.</p> <p>Consider whether to develop a phasing policy to ensure a spread of development throughout the plan period.</p>
<p>Landscape and biodiversity</p> <p>The LDP should be consistent with the Biodiversity Duty placed on all public bodies by the Natural Environment and Rural Communities Act 2006. Increasing biodiversity and improving habitat management is recognised within the LDP as an issue of significance. Loss of and threats to certain species and habitats is an acknowledged issue within the LDP.</p> <p>An objective of the LDP is to preserve, protect, manage and enhance the biodiversity and landscape of the county. The Preferred Strategy has been informed by a Landscape Capacity and Sensitivity Study of land around the County's main settlements. Further phases of the study will inform the detailed allocations for inclusion in the Deposit Plan. The county landscape assessment based on LANDMAP has been undertaken by Monmouthshire County Council.</p> <p>It would be useful to draw out the spatial implications of the LANDMAP assessment and the Landscape Capacity and Sensitivity Study in developing landscape-related policies in the deposit plan, and in the assessment of candidate sites. Introduction of any landscape designations in the deposit plan will need to be suitably evidenced.</p>	<p>Greater articulation of the significance of 'landscape capacity', what it actually means and implications for the plan will be required</p>

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<p>Minerals (policy S14)</p> <p>There is no minerals evidence presented at this stage, e.g. evidence of landbanks including dormant sites/permissions and landbank figures, possible prohibition orders, current operations/production levels and expected future contribution (outlined in the RTS), mineral resources potential for secondary or recycled aggregates, inactive sites, proposals for restoration, and the mineral reserves that should be safeguarded.</p> <p>The Deposit Plan should have regard to the evidence outlined in the RTS for South Wales. The Council should contribute to the regional demand for a continuous supply of minerals and present evidence of joint-working. It is noted that a joint study is being undertaken with former Gwent local authorities to identify aggregate resources that will require safeguarding in the Deposit Plan.</p> <p>The Deposit LDP should ensure;</p> <ul style="list-style-type: none"> • a landbank for aggregates is maintained and safeguarded • existing and potential wharves are safeguarded • sand and gravel reserves are safeguarded • limestone reserves are safeguarded • efficient use of materials is considered <p>Mineral safeguarding and mineral allocations for working will need to be shown on the proposals map.</p>	<p>The deposit plan should:</p> <ul style="list-style-type: none"> - adequately safeguard mineral resources in line with national policy and consistently across boundaries with neighbouring LPAs; - adequately provide for the contribution to aggregates production over the plan period identified in the RTS; - include Buffer Zone and dormant site requirements; - clarification on serving prohibition orders would be of assistance; - be supported by background evidence;
<p>Renewable Energy</p> <p>National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource, renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs.</p> <p>There is reference in Policy S10 Sustainable Development, that all new developments must promote sustainable resource use (including energy efficiency...renewable energy production...), and Policy S12 Climate Change that all new development proposals must promote the use of renewable energy resources including on-site generation. The monitoring framework in Chapter 9 states that it will set a target for the number of new developments that incorporate onsite renewable energy generation.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>
<p>Retail Hierarchy (pages 24 & policy S5)</p> <p>The plan identifies 4 main retail centres, 3 local centres and smaller neighbourhood centres. Complementary uses such as tourism are considered in conjunction with retail to sustain Monmouthshire's historic towns.</p>	<p>The deposit plan and its evidence base should be suitably robust and clear</p>

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<p>Sustainable Development (policy S10) The policy could be re-worded to “Protect, maintain, enhance and positively manage the quality of the natural, historic and built environment”.</p>	Amend for deposit plan.
<p>Waste (policy S13)</p> <p>It is noted that the authority is undertaking a study to identify a network of waste facilities in Monmouth including potential for in-building and landfill waste facilities and will inform detailed policies in Deposit.</p> <p>LDPs should identify sites for local and regional waste facilities or areas where such facilities may be suitable in line with PPW (12.5.4), and having regard to the requirements identified in the Regional Waste Plan.</p> <p>Policies and proposals should be based on evidence, including;</p> <ul style="list-style-type: none"> - why the sites have been chosen for the location of suitable waste facilities; and - the ability of the sites to accommodate site waste management facilities required to meet regional and local needs (e.g. suitability and availability). <p>Sites allocated for waste management in the LDP should be identified on the proposal map.</p> <p>Policies proposing any major new development should incorporate adequate and effective waste management facilities.</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - be supported by background evidence; - identify sites for local and regional waste facilities.
<p>Water and flooding</p> <p>Flooding is identified as a key issue for Monmouthshire (pg 19 & 28). The Strategic Flood Consequences assessment undertaken by consultants Scott Wilson. Their initial assessment of flood sources within the Monmouthshire indicates that flooding is mainly tidal and fluvial. However, to a lesser extent a flood risk from overland flow exists within the study area, and flood risk from groundwater is considered minimal. There are localised sewer flooding issues within the area due to limited sewer capacity.</p> <p>Some of the Strategic Housing Sites identified in Policy S3 have potential flooding issues and these need to be assessed in line with the TAN 15 strategy of directing development away from the floodplain. It is important that Deposit plan allocations and policies are in line with the TAN 15 and that sites in zones B and C are assessed in line with the requirements of TAN 15 to draw out any implications of this for the deposit LDP.</p>	Ensure that flooding issues are addressed in the deposit plan.

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<p>Water infrastructure</p> <p>Whilst the strategy does not highlight sewerage infrastructure as a potentially problematic issue, the Strategic Flood Consequences Assessment states there are localised sewer flooding issues within the County due to limited sewer capacity. National planning policy states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. If the provision of water/sewerage infrastructure is required, the measures needed and where, how and when they could be secured should be identified in the deposit plan. It would be useful to consider: current capacity, implications of public investment programmes, co-ordination of any improvement works, the need for phasing, and any other relevant delivery issues. Although it is unnecessary to reiterate national policy, the local implications of how infrastructure capacity and provision impact on the preferred strategy and its delivery should be clearly outlined.</p> <p>Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.</p>	<p>Ensure that sewerage infrastructure implications for the plan's strategy and allocations are suitably addressed in the deposit plan.</p>
<p>Welsh Language</p> <p>PPW paragraph 2.10.2 states that local planning authorities should consider whether they have communities where the Welsh language is part of the social fabric. It is not evident if any consideration has been given to the Welsh language.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>

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CE 3 There are clear mechanisms for implementation and monitoring	
Comments	Suggested Actions
<p>Implementation and Delivery</p> <p>The deliverability of the preferred option has not really been addressed in the Preferred Strategy. When developing the deposit plan more consideration should be given to this matter, including timescales for implementation, and impacts on the delivery of affordable housing should be fully explored. There is an indication that flooding issues, sewerage infrastructure, agricultural land quality and other constraints are significant issues, and it is not entirely clear that these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan.</p> <p>It would be beneficial if a background paper could be produced to demonstrate how the plan's proposals can be delivered over the plan period. If proposals are reliant on infrastructure this should be evidenced on how it will be delivered and by whom. There will be consequential phasing implications to consider.</p> <p>A monitoring framework is at chapter 9 which sets out indicators and targets as a basis for assessing the effectiveness of the strategic policies. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. A developed framework should consider plan objectives, strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WAG core indicators are included. <i>(as stated at monitoring and implementation & deliverability at Test CE1/2 above.)</i></p>	<p>Ensure that the key elements of the strategy can be delivered, and that proposed timescales for this delivery are provided. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Produce a background paper on infrastructure and deliverability.</p> <p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies, and that WAG core indicators are included. (and see LDP Manual paragraph 9.5)</p>
CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
<p>There needs to be some flexibility in terms of housing land requirements as a response to the current economic climate. Given the current economic climate, consider whether the current commitments and windfalls are likely to come forward as expected (see also phasing comment at Test CE1 / CE2). The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan. Consideration should be given to allocating further new sites to add a degree of flexibility.</p>	<p>Ensure the strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>